

// CED RESPONSE ON THE E-HEALTH ACTION PLAN

Contact details:

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Please indicate the sector:

Association:

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Please indicate the scope

EU

ASBL (not-for-profit Association)

Benefits of eHealth solutions

In your view, what are the main benefits you expect from the large scale deployment of eHealth solutions?

The main benefits that the CED would expect are the following:

- To make the exchange of information between healthcare providers more efficient and to reduce the time spent in communications;
- To increase patient safety as the healthcare provider would know much more about a patient;
- To reduce possible gaps in rural areas due to a potential lack of health professionals;

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- That patients could follow their own medical data more easily;
- To allow the collection and analysis of statistical health data.

However, these benefits should not in any way compromise patients' fundamental right to privacy and the confidentiality of their health information. Special security precautions must exist in order to prevent outside access to communications regarding doctor-patient relations during electronic transfer procedures or remote maintenance of the system. Patient data protection should be a priority.

The four objectives of the Action Plan

Taking into consideration the background described in the introduction and existing policy developments made since 2004, do you agree with the four objectives of the Action Plan (listed below)?

- Objective 1: Increase awareness of the benefits and opportunities of eHealth, and empower citizens, patients and healthcare professionals
- Objective 2: Address issues currently impeding eHealth interoperability
- Objective 3: Improve legal certainty for eHealth
- Objective 4: Support research and innovation in eHealth and development of a competitive European market.



COUNTRY	Objective 1	Objective 2	Objective 3	Objective 4
CED	Yes, I agree	Yes, I agree	Yes, I partially agree	Yes, I partially agree*

* CED comment	The support on research and innovation in e-health with public funding must be
to objective 4	carried out wisely. Long-term projects should be the aim. To achieve this, the EU
	should concentrate on a legal framework that provides incentives to quality e-health
	solutions that are indeed necessary, and that at the same time give private
	companies the required confidence to invest more in e-health applications. There
	would be no improvement for a competitive European Market if e-health solutions
	are used just for statistical purposes.

Main barriers

What do you consider to be the main barriers preventing the large scale deployment of eHealth solutions?

- a. Lack of large scale evidence for potential improvements to healthcare processes
- b. Budgetary constrains
- c. Lack of leadership (policy makers, local managers)
- d. Lack of users' (i.e. patients' and/or healthcare professionals') awareness
- e. Limited users' (i.e. patients' and/or healthcare professionals') skills in using ICT
- f. Health professionals' acceptance
- g. Inappropriate legal frameworks and lack of reimbursement schemes
- h. Lack of interoperability
- i. Inappropriate organization of the healthcare process
- j. Access to standards
- k. Lack of cross-sectoral coordination / integrated healthcare schemas
- I. Other (please specify)

COUNTRY	А	В	С	D	Е	F	G	Ι	_	٦	K	L
CED		Х					Х	X			X	

In your view, how should the European Commission contribute to addressing the barriers you selected above, and provide incentives to promote eHealth solutions?

- a. Propose legislation
- b. Facilitate cooperation between Member States and/or regions to address common challenges
- c. Support systematic evaluation of the benefits and costs, effectiveness/usefulness of eHealth solutions
- d. Provide guidance on planning, implementation, and change management processes
- e. Support deployment of eHealth services/solutions based on evidence
- f. Explore innovative financing, reimbursement and incentive schemes to promote innovation in eHealth
- g. Provide guidance for achieving EU wide interoperability, for example use of common standards, profiles, terminologies etc.
- h. Enhance awareness of benefits and opportunities of eHealth
- i. Improve ICT skills of users (citizens/patients/health professionals)
- j. Other (please specify)

COUNTRY	Α	В	С	D	Е	F	G	H	I	J
CED		Х	Х			Х	Х			

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Objective 1: Increase awareness of the benefits and opportunities of eHealth, and empower citizens, patients and healthcare professionals

In your view, what actions should the European Commission consider to improve awareness and empowerment of citizens and patients?



In your view, what actions should the European Commission consider to improve healthcare professionals' awareness and acceptance?

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In your view, in which of the areas listed below European cooperation is most important?

- a. ICT systems for clinical use (decision support systems, EHR, ePrescription, Radiology Information Systems etc.)
- b. ICT systems for non clinical use (administrative software, booking, statistic applications, professional education, etc.)
- c. Information systems for Public Health (patient registries, other data bases for public health, research etc.)
- d. ICT systems for patients / individuals (lifestyle, prevention, monitoring)
- e. Other (please specify)

COUNTRY	А	В	С	D	E
CED	X		X	X	

Objective 2: Address issues to achieve eHealth interoperability

In your view, in which of the areas listed below European cooperation is most important?

- a. Taking steps to achieve secure, unambiguous and portable electronic identification of EU citizens
- b. Taking steps to advance technical interoperability to facilitate de-fragmentation of the eHealth market
- c. Taking steps to advance semantic interoperability to lay the foundation for a European level infostructure, to facilitate the access to and the reuse of common semantic interoperability resources
- d. Taking steps to address legal barriers to interoperability
- e. Taking steps to address lack of financial resources through coordination, support actions, pilots, knowledge sharing, etc.
- f. Other (please specify)

COUNTRY	А	В	С	D	E	F
CED		Х	Х		Х	

A European Interoperability Framework could be developed to provide support to Member States and stakeholders to solve interoperability issues. In your view, in which of the areas listed below is European cooperation most important?

- a. the harmonised standards, profiles and technical specifications to be used to ensure cross border eHealth Interoperability
- b. the harmonised interoperability testing and conformance systems to be put in place
- c. the harmonised medical terminologies, ontology, classifications and codification systems that need to be used at EU level
- d. defining common interoperability use cases for cross-border healthcare
- e. defining measures to achieve convergence of national eHealth interoperability frameworks
- f. Other (please specify)

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COUNTRY	А	В	С	D	E	F
CED	Х		X		X	

Objective 3: Improve legal certainty for eHealth

In your view, how should the European Commission address legal issues related to eHealth?

- a. Encourage and support Member States in addressing relevant legal and organisational issues in a coordinated manner
- b. Propose a European legal framework to cover the rights of users of eHealth services in cross-border situations
- c. Encourage professional associations, scientific societies and civil society representatives to promote best practices through the development of guidelines and/or codes of conduct for eHealth
- d. Other (please specify)

COUNTRY	Α	В	С	D
CED	Х	X	Х	

In your view, which areas should the European Commission focus on?

- a. Liability
- b. Reimbursement
- c. Data protection
- d. Licensing and accreditation of professionals and healthcare providers
- e. Other (please specify)

COUNTRY	Α	В	С	D	Е
CED	X		Х	X	

CED Highly sensitive personal data is being processed while using e-health applications. For this reason it is of utmost importance that a very high degree of data protection throughout the EU is guaranteed. Any abuse should be considered a criminal offence. Only authorized health personnel should be allowed to process this data.

Objective 4: Support research and innovation in eHealth and development of a competitive European and global market

In your view, how should the European Commission support innovation?

- a. Provide strategic recommendations to Member States and stakeholders
- b. Provide funding for the scaling up of innovative eHealth solutions, for example by facilitation deployment of research results
- c. Provide more flexible financing mechanisms to support research and innovation
- d. Support collection, dissemination and analysis of information on innovative healthcare services
- e. Support user-driven research through use of appropriate financial instruments (for example use of CSO or similar instruments)
- f. Other (please specify)

COUNTRY	Α	В	С	D	E	F
CED	Х	Х		Х		

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In your view, in which of the areas listed below should the European Commission cooperate with international partners?

- a. Stimulate the international policy dialogue to facilitate the deployment of ehealth solutions.
- b. Taking steps to advance interoperability
- c. Support R&D to advance new innovative solutions (incl. Virtual Physiological Human, Personal Health Systems, ICT for Public Health)
- d. Promote benchmarking and evaluation projects in order to provide evidence to support deployment of ehealth solutions.
- e. Promote the use of EHR
- f. Promote deployment of telemedicine services
- g. Other (please specify)

COUNTRY	Α	В	С	D	E	F	G
CED	Х	Х					

CED	It would be necessary that the Commission clarifies who are the international partners for
comment	the purposes of this question.
