ADHA TRIAL OF CONSULTATIVE PROCESS TO RECOMMEND APPROPRIATE TECHNICAL STANDARDS FOR TELEHEALTH CONSULTATIONS

STAGE 2 CONSULTATION DOCUMENT
February 2021

INTRODUCTION AND BACKGROUND

Thank you once again for the feedback on the Stage 1 Consultation documents distributed late November 2020.

We have continued to receive feedback post Christmas and engaged in further discussion with a number of stakeholders. There have also been some new participants joining the discussions, so a restatement of the purpose and scope of the project is appropriate.

Background to the Project

Before summarising the outcomes of these January discussions, it is worthwhile reiterating the background to the project:

- the Project is part of Australian Digital Health Agency's work on development of approaches to improved orchestration of standards governance in Australia
- the Commonwealth Department of Health has welcomed and supports the project
- it builds on the Australian Institute of Digital Health's consultations last year on a digital health standards selection process
- it is intended as a trial of a *process*, to both learn lessons on the process and to produce a product – recommendations on what technical standards might be appropriate for telehealth
- telehealth was chosen as the project scope as it is topical due to Covid-19, and many players were raising the issues of standards, both technical and clinical
- the project's product will inform and provide guidance, principally to governments, but also industry and other stakeholders for their further consideration
- feedback on Stage 1 of the consultations identified 9 key themes. Together with the outcome of the January discussions, these themes informed the development of this Stage 2 consultation document
- the high level worldwide Environmental Scan undertaken by PWC confirmed interest in appropriate standards frameworks for telehealth and broader virtual health care and the need for a spectrum of technical standards, clinical standards, policies and guidelines
- the scan confirmed strong support for technical standards on security, interoperability and privacy protection
- a number of countries and health systems are now developing specifications and requirements for virtual health care[1]

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[1] As just one example, see the Ontario Health Virtual Visits Solution Requirements Version 1.1.1 released in November 2020 and available at www.otn.ca/verification

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- Stage 1 of the consultations also confirmed the need for flexibility, promoting innovation and avoiding creating barriers to the growth and development of virtual health in Australia.

The nine key themes from the Stage 1 Consultation in November/December 2020

As emailed to stakeholders on 17 December 2020, the Stage 1 consultations for the Project identified nine key themes:

- **Language is important** – the word "standard" means different things to different people. Need to distinguish requirements from features and capabilities that may be useful for some consultations, but not mandated for all. Also, a need to distinguish technical standards from clinical standards, policies and guidelines.

- **Avoiding duplication and using generic digital standards wherever possible** – need to avoid creating separate additional standards for telehealth and/or duplicating accepted standards. Cybersecurity standards are now well developed and applicable across a wide variety of settings. Similarly, privacy and technical standards for video and audio quality.

- **Supporting consumer experience** – strong support for ensuring a person centred approach rather than a provider centric approach and for facilitating meeting the varying needs and expectations of consumers and their family and carers. Features and capabilities should enable broader interactions, sharing of information and greater health literacy.

- **Supporting broad range of health professionals and health services** – telehealth is not only general practice, it is actively used by hospitals, allied health professionals (including dentists and pharmacists), community service providers and other specialists. Standards need to facilitate and support wide adoption across care settings and health professionals.

- **Future proofing and flexibility** – standards need to support innovation while maintaining quality and safety. Telehealth sits within a wider digital health and virtual care landscape. There is an increasing need for standards to facilitate integration with remote monitoring, personal care, healthy lifestyle apps, other devices and information sources. Standards need to evolve. Adoption and conformance need realistic timelines for vendors, providers and other players.

- **Integration and interoperability** – there is a need to facilitate integration of telehealth with clinical and business workflows so that it is a seamless and easy way of working for clinicians and their use of practice management, clinical information and EMR/EHR systems.

- **Supporting multiparty telehealth consultations** – telehealth is not just a 1:1 interaction. Standards need to support involving more than one clinician, multidisciplinary team reviews and enabling participation by patient, their carer/family and/or support persons such as an interpreter.

- **Need for complementary clinical standards across digital health** – there are a growing number of clinical guidelines, principles and policies. Drawing these together into Australian Digital Health Clinical Standards, addressing safety, quality, clinical effectiveness, consumer experience, clinical governance and provider satisfaction would be a favourable way forward.

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- **Creating and maintaining a national standards governance framework for digital health** – covering development, maintenance and conformance, aligned to international best practice.

Outcomes from January discussions

While debate on the elements, scope and pace of recommending standards for telehealth continued, there is strong agreement and support for embedding telehealth in the Australian digital health landscape as a stepping stone to broader use of virtual care. This requires establishing a firm foundation for safe, secure, easy to use and clinically relevant telehealth across primary care, allied health, ambulatory specialist care, hospitals, community services, residential aged care, home care and self care.

Participants agree clinical and technical standards, guidelines and policies are necessary and important, but also want these to be enablers, encouraging innovation and ensuring that as many consumers across Australia, irrespective of location, cultural and linguistic background, social situation and health status, are able to access to safe, secure, interoperable and easy to use quality telehealth without creating "digital divides".

There was much comment of technical standards development being a balancing process – ensuring safe, quality telehealth while avoiding unreasonable imposts on software and system providers and those procuring product offerings.

They agree that interoperability remains a challenge in Australian digital health. For telehealth this interoperability includes progress on systems integration, technical integration with other digital health tools (such as remote monitoring and digital diagnostic devices) and data interoperability. Telehealth needs to be interoperable with practice management systems, hospital EHR/EMRs, online booking systems, e prescribing, e referrals and other clinical software and systems.

Participants agreed that the objective is to create an environment for both providers and consumers where it is as easy to provide a telehealth consultation and associated clinical record, care and treatment as it is face to face. There is strong support for incentivising use of video over audio wherever feasible.

Participants agree that it is important to maintain a focus on the desirable "future state", encouraging the development of enhanced features and capabilities, adopted and adapted over time as appropriate to the needs and sophistication of the participants (both providers and consumers), the clinical situation and the evidence on outcomes, quality, cost effectiveness and participant satisfaction.

What does the Stage 2 Consultation Document propose?

Against this background, the Stage 2 Consultation Document proposes:

1. An **initial focus for recommended technical IT telehealth standards** on:
   - Security
   - Privacy compliance
   - Interoperability

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- Integration
- Audit trail

2. Development and ongoing maintenance of a **future focus set of desirable capabilities and features** with appropriate technical IT standards being sourced and/or developed.

   Emerging from developments and commentaries both in Australia and overseas, these capabilities and features might include one or more of the range of functionalities listed in the attached Stage 2 Consultation Paper.

3. As evident from the consultation discussions, there is support for development of comprehensive clinical standards, building on the variety of clinical guidelines and policies developed by clinical groups, professional associations and health services. While clinical standards are not within the Project Scope, the Stage 2 Consultation Paper seeks comment on whether a recommendation arising from the Project should be that jurisdictions commission the Australian Commission on Safety and Quality in Health Care to develop comprehensive **Australian Telehealth Clinical Standards** in 2021/22 in consultation with consumers, providers, professional colleges and associations and industry. These standards can then be periodically reviewed, updated and expanded over time into comprehensive Australian Virtual Care Clinical Standards.

4. Support for an **ongoing program to strengthen consumer engagement**, literacy, skills and use of telehealth.

5. A proposal to the Australian Privacy Commissioner to develop **guidance on compliance with the Australian Privacy Principles when using telehealth**.

Attached is our Stage 2 Consultation Paper for your review, feedback and comments. It comprises of **two documents**:

1. An **ADHA Telehealth Standards Feedback form**
2. An **updated ADHA Technical Standards to Categories Mapping** document grouped into:
   - Foundation Categories – with recommended IT standards listed for consideration and comment
   - Requirements for Future Standardisation – recommended IT standards which need to be sourced and/or developed in the medium term for these requirements
   - A list of **potential desirable features and capabilities** – while no IT standards are proposed as part of the Project, comments on the list are welcomed.

Your response is requested by **Friday 26 February**. This will enable the Project Report (including lessons learned from the process of consultation undertaken) to be completed during March.

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