



**UNION EUROPÉENNE DES MÉDECINS SPÉCIALISTES
EUROPEAN UNION OF MEDICAL SPECIALISTS**

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UEMS CONTRIBUTION

to the Public Consultation on the eHealth Action Plan (eHAP)
2012-2020

CONTRIBUTION to eHealth Action Plan (eHAP)

EXECUTIVE SUMMARY

The UEMS is a non-governmental organisation representing national associations of medical specialists in the European Union and in associated countries. With a current membership of 38 countries and operating through 40+ Specialists Sections and European boards, the UEMS brings together approximately 1.4 million medical specialists in Europe. With the support of its membership, the UEMS is committed to the promotion of free movement of European medical specialists while ensuring the highest quality of medical care for European citizens.

The UEMS congratulates the European Commission for addressing the challenges faced by Member States and healthcare systems.

Particular attention should be paid to issues relating to:

- Quality and safety of e-Health solutions, used directly or indirectly, for the benefit of
- European citizens
- The necessary guarantees required with regard to the protection of personal data and confidentiality
- Ensuring that each e-Health solution developed meets the needs of both patients and
- health professionals..

While the UEMS is particularly pleased to see the importance of each of these issues acknowledged by the Commission, it is also concerned to ensure that all healthcare professionals, but particularly medical specialists, have proper facilities in which to improve the profession's ability to maintain high quality of care delivered to their patients when using ICT (Information & Communication Technologies).

The UEMS, as a non-governmental organisation aiming to promote the mobility of medical specialists in Europe while guaranteeing the highest level of healthcare standards across Europe, carefully examined this Consultation document and carried out an extensive consultation with its constituent bodies to elaborate this contribution..

The UEMS has therefore made a certain number of observations and recommendations in regard to the various issues raised in the European Commission's consultation. Additional issues having a direct or indirect impact on these matters have also been addressed. The UEMS will now seek adherence to these concerns among the healthcare community and is happy to offer its expert-knowledge to the Commission and other EU decision-makers in the fields identified as its core areas of interest and expertise.

CONTRIBUTION from the EUROPEAN UNION of MEDICAL SPECIALISTS to the PUBLIC CONSULTATION ON THE E-HEALTH ACTION PLAN (2012-2020)

INTRODUCTION

The UEMS is a non-governmental organisation representing the national associations of medical specialists in the European Union and in associated countries. With a current membership of 38 countries and operating through 40+ specialists Sections and European boards, the UEMS brings together around 1.4 million medical specialists in Europe. With the support of its membership, the UEMS is committed to the promotion of free movement of European medical specialists while ensuring the highest quality of medical care for European citizens.

The UEMS congratulates the European Commission for launching this public consultation as a first practical step towards the implementation of a European strategy for eHealth and welcomes this opportunity to contribute its views on an issue of key importance to its constituency. It also welcomes this document as a first step in defining innovations and areas of improvement in the framework of the Action Plan to come.

As a whole, the UEMS, as an organisation strongly committed to values such as the quality and the safety of healthcare treatment in Europe, commends the European Commission and EU Member States taking these issues as of the highest importance.

The UEMS is keen to contribute its professional expert-knowledge on the various issues raised in the Commission's document. In its Strategy Document¹, the UEMS precisely defined its fields of expertise and areas of interest and competence as the following:

- Postgraduate Training (PGT)
- Continuing Medical Education and Professional Development (CME-CPD)² - Quality Assurance (QA) in specialist practice

¹ See UEMS 2008/05: The UEMS Strategy

² *"The UEMS defines CPD as the educative means of updating, developing and enhancing how doctors apply the knowledge, skills and attitudes required in their working lives. The goal of CPD is to improve all aspects of a medical practitioner's performance in his/her work.*

"CPD therefore incorporates the concept of CME, which generally is taken to refer only to expanding the knowledge and skill base required by doctors. While the initial model of continuing education for practitioners focused on CME, an increasing recognition of the many components that contribute to good medical practice has led to CPD being accepted as the more appropriate concept.

*"There is a continuum from undergraduate medical education (UGE) through postgraduate training (PGT) to continuing professional development (CPD). CPD forms part of a personal program of lifelong learning that every doctor is engaged in from his/her first day at medical school until their retirement from practice."*Ref: Basel Declaration – UEMS Policy on CPD

<http://admin.uems.net/uploadedfiles/35.pdf>

However, for the purpose of this document, the terms "CME-CPD" will be used.

For the purpose of contributing to the current consultation, the UEMS has restricted its comments to this document. However, for a full coverage of all the issues raised, the reader is recommended to also consult the following UEMS policy papers:

- The UEMS Charter on Quality Assurance in Medical Specialist Practice¹
- The UEMS Declaration on Promoting Good Medical Care²
- The UEMS Budapest Declaration on Ensuring the Quality of Medical Care³
- The UEMS Bratislava Declaration on e-Medicine⁴
- The UEMS contribution to the green Paper on the European Workforce for Health⁵

The views presented in this paper are based on contributions from the UEMS constituent bodies, i.e. National Medical Associations and UEMS Specialist Sections & European Boards, as well as key elements from well-established UEMS policy.

List of respondents to our internal consultation:

National Member Associations

Austria
Denmark
Finland
Ireland
Italy
Poland
Portugal
Spain
The Netherlands

UEMS Specialist Sections

Allergology
Clinical Genetics Dermatology — Venerology
Ophtalmology
Nuclear Medicine
Surgery

¹ For the full document, see <http://admin.uems.net/uploadedfiles/175.pdf>

² For the full document, see <http://admin.uems.net/uploadedfiles/772.pdf>

³ For the full document, see <http://admin.uems.net/uploadedfiles/875.pdf>

⁴ For the full document, see <http://admin.uems.net/uploadedfiles/893.pdf>

⁵ For the full document, see <http://admin.uems.net/uploadedfiles/1280.pdf>

Benefits of e-Health Solutions

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

In general terms, e-Health holds the expectation to strike a balance between the generalised shortage of healthcare workforce to ensure safe and quality care in all European countries and the sustainability of national budgets for health.

New Information and Communication Technologies (ICT) are hopefully expected to offer the potential to increase the quality of care while reducing the costs. The UEMS is well aware of these possibilities but stresses the importance of bearing in mind the specificities of medical care which aims at first to provide patients with appropriate personal cure or treatment for their disease. Therefore, in developing ICT for health, strong collaboration between IT companies developing tools in this field and health professionals is essential to ensure a proper, timely and effective treatment of patients. Delivering healthcare is not merely providing a service to the consumer. Healthcare professionals (a.o. medical specialists) must remain closely involved in the conception of new tools which directly impact on their daily practice as they represent major senior actors in Healthcare systems.

The UEMS strongly believes that while patients' awareness and involvement in monitoring their own health can be highly beneficial to ensure compliance for effective treatment, health professionals are the key players in delivering that care. Therefore the UEMS expects that the large-scale deployment of e-Health will be limited to the following aspects:

- Improving efficiency and advancing medical practice in the delivery of healthcare
- Improving and facilitating access to validated healthcare information
- Speeding transfer of information, between patient and doctor, between doctor and doctor, between healthcare professionals in general both within and between hospitals and also between hospitals and primary care/community services
- Providing high quality tools for decision-makers and to monitor the quality of care provided
- Supporting the cooperation between healthcare professionals
- Granting better access to evidence-based healthcare pathways for health planners, health professionals
- Supporting and developing enhanced quality of medical education and training
- Facilitating access to quality training standards including tools for knowledge and skills renewal and improvement (e.g. e-CME and e-CPD)

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 e-Health, and empower citizens, patients and healthcare professionals.

Yes I agree	75,00%
Yes I partially agree	18,75%
No I don't agree	6,25%
I don't know	0,00%

e-Health offers many possibilities for patients and health professionals, also for governments or health insurers.... Still, any e-Health solution should clearly demonstrate the added value for these users with regard to the quality of care, compatibility with the needs of health professionals and above all the liability of such tools with regard to confidentiality and security.

Greater awareness, by raising the benefits and opportunities of e-Health, will pave the way to consolidated trust in IT tools developed in the field of Health.

However, e-Health services are in essence different from traditional, face-to-face medical services. Patients have to be informed of “benefits, opportunities but also limitations” of e-Health. The quality of information provided to them should be seriously considered. Indeed, at present considerable information is made available but without any guarantee as to its validity.

Once again, health professionals do play major role in interpreting and providing unbiased information to their patients. Health Professionals Associations such as the UEMS must be involved in the quality management process at European level aiming at providing European citizens with high quality, non biased information.

Objective 2: Address issues currently impeding e-Health interoperability

Yes I agree	75,00%
Yes I partially agree	18,75%
No I don't agree	6,25%
I don't know	0,00%

The issue of interoperability is a major issue when dealing with e-Health. Still, prior to addressing this issue, Member States, European Institutions and stakeholders should focus on ensuring operability of existing systems.

Whilst a European approach is clearly needed in order to address this issue, the UEMS strongly recommend that e-Health deployment be also further deployed at National level as it appears that presently many pilot projects are undertaken at local level or regional level without clear coordination at national level.

The UEMS supports the idea that the deployment of e-Health solutions should be developed taking into consideration the issue of interoperability. In this respect, the UEMS encourages the European commission and the Member States to support the development of European standards in this field. This is likely to contribute to building the needed trust in e-Health.

Objective 3: Improve legal certainty for e-Health (compulsory)

Yes I agree	62,50%
Yes I partially agree	25,00%
No I don't agree	0,00%
I don't know	6,25%

According to UEMS members, legal aspects of e-Health services are of major concerns. The UEMS strongly supports the proposal to address this issue and is ready to provide the European Commission with its constituency's views and expectations.

Legal certainty involves many aspects which are of great importance for the medical profession's daily practice. The scope of this issue is very wide and encompasses among others the following issues:

- Legal issues of online consultation (Patient to Doctor, Doctor to Doctor);
- Access to Patients Records;
- Legal obligations to inform patients using e-Health services (consent);
- Medical confidentiality and Data Protection;
- Clinical Responsibility for quality of healthcare services provided;
- Liability for e-Health services and products;
- Issues of jurisdiction and medico-legal responsibility

The UEMS believes that "certainty" is not an appropriate term here, as e-Health services are inherently less certain than traditional medical services. "Defined level of legal certainty for e-Health" would seem to be a more realistic objective.

Objective 4: support research and innovation in e-Health and development of a competitive European market (compulsory)

Yes I agree	43,75%
Yes I partially agree	43,75%
No I don't agree	0,00%
I don't know	12,50%

e-Health deployment and development at the European level is obviously to be supported through funding on research and innovation. The UEMS though insists that support be provided for e-Health solutions which meet users' requirements and needs. Whilst Industry-led solutions will contribute to the increase of available solutions on the market, they will not meet the necessary functional targets and in doing so will only contribute to the feeling of scepticism and separation on this issue. Too much focus on the technology itself without enough consideration of the main aim of any e-Health solutions (improving the quality of care for patients) will contribute to increase the gap between the available IT tools and the needs of users.

Supporting research and innovation is therefore important but particular attention should be paid to which type of research and innovation is funded in order to ensure that the financial incentive provided is not misled by industry-focused solutions.

e-Health tools should also be carefully implemented and controlled in order to continuously match to users' requirements. Health Technology Assessment is obviously a key element to be considered alongside the deployment of e-Health solutions.

What do you consider to be the main barriers preventing the large scale deployment of e-Health solutions? (please choose maximum 5)

<i>Budgetary constrains</i>	87,50%
<i>Inappropriate legal frameworks and lack of reimbursement schemes</i>	75,00%
<i>lack of leadership (policy-makers, local managers)</i>	56,25%
<i>Lack of large scale evidence for potential improvements for healthcare processes</i>	43,75%
<i>Lack of cross-sectoral coordination / integrated healthcare schemas</i>	43,75%
<i>Limited users (i.e. patients' and/or health professionals') skills in using ICT</i>	43,75%
<i>Lack of interoperability</i>	43,75%
<i>Healthcare professionals' acceptance</i>	37,50%
<i>Inappropriate organisation of healthcare process</i>	31,25%
<i>Lack of users' (i.e. patients' and/or health professionals') awareness</i>	18,75%
<i>Access to standards</i>	12,50%
<i>Other, please specify</i> -> <i>Fears of easier breach in patient confidentiality</i>	12,50%

Comments (optional)

Nearly 90% of the respondents to our internal consultation believe that budgetary constrains is the main obstacle to the large scale deployment of e-Health solutions. Member States tend to limit the increase, if not reduce, health budgets thus increasing the financial pressure on healthcare providers.

e-Health is expected to strike the balance between lack of financial and human resources and the sustainability of healthcare systems. However, health professionals have to face lack of resources while they are ethically bound to ensuring the highest quality and safety of care to patients. The UEMS therefore encourages Member States and European institutions to give health professionals the appropriate resources needed to provide patients with the standards of care requested by these same authorities.

Nearly 2/3rd of the respondents believe that the existing legal framework is inappropriate to ensure satisfactory quality and safety of care provided to patients. Current legislations have not a clear position on the legal consequences of using e-Health solutions in terms of responsibility or reimbursement. The UEMS considers that clearer legal frameworks at national level will contribute to ensuring the large-scale deployment of e-Health solutions.

e-Health services are mainly “pushed” by healthcare politicians and administrators as a substitute for face-to-face services which have limited supply and limited duration due to economical, organizational and manpower constraints. Though the use of e-Health solutions and telemedicine services imply a shift in work patterns in the organisation of care, the reduction of costs induced by the introduction of ICT must not to be achieved to the detriment of the quality of care.

As a result the UEMS also supports the need for evidence-based e-Health solutions which must demonstrate real added value both for the health professional and the patient.

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

<i>Support systematic evaluation of benefits and costs, effectiveness/usefulness of eHealth solutions</i>	68,75%
<i>Support deployment of eHealth services/solutions based on evidence</i>	62,50%
<i>Facilitate cooperation between Member States and/or regions to address common challenges</i>	62,50%
<i>Enhance awareness of benefits and opportunities of eHealth</i>	56,25%
<i>Explore innovative financing, reimbursement and incentive schemes to promote innovation in eHealth</i>	56,25%
<i>Provide guidance for achieving EU wide interoperability, e.g. use of common standards, profiles, terminologies etc.</i>	50,00%
<i>Propose legislation</i>	43,75%
<i>Improve ICT skills of users (citizens/patients/health professionals)</i>	31,25%
<i>Provide guidance on planning, implementation, and change management processes</i>	25,00%
<i>Other (please specify)</i>	0,00%

Comments (optional)

The various incentives proposed by the Commission are all important. As already mentioned, the UEMS advocates for the deployment of evidence-based e-Health solutions to ensure efficient and effective implementation by users and above all health professionals and patients. The UEMS advises the Commission to promote e-Health solutions that are user-centred since the main aim of any e-Health solution is to contribute or support the treatment of an illness or specific disease.

The Commission’s primary role in delivering any e-Health initiatives throughout Member States should obviously be as a coordinator. As coordinator, such aspects of support, enabling communications between Member States and providing the best framework to deliver such innovations should be comprehensive to ensure harmonised delivery and operation in each Member State. Also, there is an issue of cost in some Member States being able to afford to establish, support and maintain e-Health systems. While one benefit of e-Health is to increase efficiency, resourcing the implementation and maintenance of such systems could significantly increase costs to Member States without such structures in place at present.

Objective 1: Increase awareness of the benefits and opportunities of e-Health, 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? (Optional)**

The UEMS considers as a rule for health professionals that any e-Health solutions provided must be supported by the necessary degree of evidence. The European Commission should address this approach together with health professionals and make sure that nothing is done against this essential component of healthcare system. It should also encourage and promote the provision of validated information on e-Health solutions available on the market. The overflow of information and its origin must be carefully monitored.

Information should be validated, easily available and understandable by all citizens. Health professionals, governments and insurance have an important role to play in delivering adequate information to patients and citizens.

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

The UEMS strongly supports the fact that only evidence-based solutions need to be implemented on a larger scale. As a result, IT tools in the field of Health should be developed from the conception phase up to the market place in tight collaboration with professional organisations and/or independent medical doctors. It is therefore essential to involve health professionals in the creation of e-Health solutions which matches the needs of their daily practise of providing personalised care to patients.

The UEMS invites IT developers to collaborate with practising physicians in order to meet the needs of the profession. Private companies in this field have to consider that health professionals are key player in all healthcare systems and cannot bypass them. IT developers and health professionals have the same declared goal: to improve the quality of care delivered to patients. As a result, involving independent medical doctors from the beginning of the process up to the market place through open processes is an essential milestone toward successful implementation of e-Health solutions.

Investment in e-Health requires the necessary political will and financial resources from national governments. Healthcare professionals rely on decision-makers to properly support the implementation of e-Health solutions not only with financial means but also through technical and human resources.

Medical Specialists and healthcare professionals in general do welcome e-Health solutions as long as they fit their needs and expectations. e-Health solutions should therefore be user-focused, secure, fast and if possible small. As one of our respondents wrote: "Better spend money on healing people instead of sponsoring the IT-Major Corporations".

A better legal framework would also contribute significantly to enhancing trust from health

professionals in e-Health solutions. The lack of clarity with regard to the legal consequences, the responsibilities and the reimbursement issues are additional hindrances to adoption of e-Health solutions in their daily practise.

In your view, in which of the areas listed below European cooperation is most important? (Please choose maximum 3 options.)

<i>ICT systems for clinical use (decision support systems, EHR, e-Prescription, Radiology Information Systems etc.)</i>	81,82%
<i>Information systems for Public Health (patient registries, other data bases for Public Health, research etc.)</i>	81,82%
<i>ICT systems for patients/individuals (lifestyle, prevention, monitoring)</i>	54,55%
<i>ICT systems for non clinical use (administrative software, booking, statistic applications, professional education etc.)</i>	45,45%
<i>Other (please specify)</i>	0,00%

Comments (optional)

More than 80% of the respondents feel that the European cooperation in the field of e-Health should focus on ICT systems for clinical use and on information systems for public health.

The sharing of data among health professionals, provided security and safety measures are implemented, is essential to ensure and improve the quality of care as it facilitates the exchange of good practises and the decision process. Medical doctors primary need e-Health solutions that enables them to provide a better quality of personal care to their patients by facilitating the available information on the patient or on treatments available.

Objective 2: Address issues to achieve e-Health interoperability

The Commission Recommendation on cross-border interoperability of electronic record systems and a number of studies like 'Interoperable e-Health is worth it' or 'Semantic Interoperability' have analysed specific areas of e-Health interoperability.

Most recently, in 2010, the Calliope Thematic Network published a report called 'EU e-Health Interoperability Roadmap' in which the Network makes several recommendations to promote e-Health interoperability in Europe.

In your view, in which of the areas listed below European cooperation is the most important? (Please choose maximum 3 options)

<i>Taking steps to address legal barriers to interoperability</i>	87,50%
<i>Taking steps to address lack of financial resources - through coordination, support actions, pilots, knowledge sharing, etc.</i>	62,50%

<i>Taking steps to achieve secure, unambiguous and portable electronic identification of EU citizens</i>	50,00%
<i>Taking steps to advance semantic interoperability to lay the foundation for a European level info-structure, to facilitate the access to and the reuse of common semantic interoperability resource</i>	43,75%
<i>Taking steps to advance technical interoperability to facilitate de-fragmentation of the eHealth market</i>	37,50%
<i>Other (please specify)</i>	0,00%

Comments (optional)

87.50 % of the respondents feel that the main area in which the European cooperation should focus is legal barriers to interoperability. The UEMS stresses the importance of legal clarity in the implementation of e-Health on a larger scale. (See comment on page 3)

Semantic Interoperability should also be addressed with careful scrutiny, also in the framework of Trans Atlantic Cooperation, as it not only involves data-interchange between systems, across borders or with market defragmentation but also with exchange of information and knowledge for research which is now *de facto* international.

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? (Please choose maximum 3 options)

<i>the harmonised standards, profiles and technical specifications to be used to ensure cross border eHealth interoperability</i>	81,25%
<i>the harmonised terminologies, ontology, classifications and codification systems that need to be used at EU level</i>	75,00%
<i>defining common interoperability use cases for cross-border healthcare</i>	62,50%
<i>defining measures to achieve convergence of national eHealth interoperability frameworks</i>	43,75%
<i>the harmonised interoperability testing and conformance systems to be put in place</i>	6,25%
<i>Other (please specify)</i>	
<i>> Modelling Info-structure platforms and services, Terminology translations, Ontology</i>	6,25%

Working of common standards is very important to ensure a full deployment of e-Health solutions. In this regards a close collaboration between IT companies and health professionals is needed. The UEMS strongly recommends that guidelines and common standards for e-Health solutions be further developed at the European level.

Objective 3: Improve legal certainty for e-Health

**In your view, how should the European Commission address legal issues related to e-Health?
(Please choose maximum 3 options)**

<i>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 services</i>	93,75%
<i>Encourage and support Member States in addressing relevant legal and organizational issues in a coordinated manner</i>	62,50%
<i>Propose a European legal framework to cover the rights of users of eHealth services in cross-border situations</i>	56,25%

Comments (optional)

The UEMS encourages the European Commission to define a legal framework for teleservices and clearly set the rules applying to e-Health services and their link with "traditional" healthcare services.

Bearing in mind the legal consequences for providers of "traditional" healthcare, the European Commission is strongly invited to address the issue of legal responsibility of e-Health providers with regard both to patients and health professionals. Legal responsibility of IT providers of e-Health solutions is to be clearly defined especially the link between health professional, patient and IT provider. The liability of both products and providers should be addressed since they impact health and can potentially endanger patients' health.

The UEMS advocates that necessary guarantees are maintained while using e-Health services with regard to the quality and safety of care provided to patients.

In the framework of the elaboration of the Directive on Patients rights in cross-border care, the UEMS supported several amendments and notably proposed one amendment aiming at addressing the issue of the use of e-Health solutions¹. The UEMS expressed its concerns "*about the potential misuse of information and communication technologies in healthcare, with associated potential risks to patients. Therefore, the UEMS insists on the same level of guarantee, in terms of quality and safety, being applied to these services as compared to "standard" medical acts.*"

The UEMS proposed the following amendments which was not included in the final compromise due to failure of Member States to agree on this issue.

¹ UEMS proposed amendments on the draft report on the proposal for a directive of the European Parliament and of the Council on the application of patients' rights in cross-border healthcare (COM(2008)0414 — C6-0257/2008 –2008/0142(COD))

The Member States shall ensure that the use of e-Health and other telemedicine services:

(a) adhere to the same professional medical quality and safety standards as those in use for non-electronic healthcare provision.

(b) offer adequate protection to patients, notably through the introduction of appropriate regulatory requirements for practitioners similar to those in use for non-electronic healthcare provision.

In your view, which areas should the European Commission focus on? (Please choose maximum 3 options)

<i>Data protection</i>	68,75%
<i>Licensing and accreditation of professionals and healthcare providers</i>	62,50%
<i>Liability</i>	50,00%
<i>Reimbursement</i>	43,75%

Comments

According to UEMS Members, the issue of data protection and licensing of professionals and healthcare providers are the two main areas on which the Commission should focus.

The deployment of e-Health solutions increases the personal data available with a collateral risk that this personal data is misused either by inappropriate entities or for the wrong purposes. With sensitive information being used by health services in general and e-Health services in particular, specific attention should be paid to ensure that the necessary level of protection is guaranteed to personal data.

Patients and health professionals will only rely on e-Health services if enough safety and security in managing personal data is provided.

Whilst patients believe that only a few senior clinicians would have access to their personal medical data, the reality, in some countries, is that virtually any unqualified employee in the healthcare system can have access with the real risk of "breach of confidentiality"

The multiplication of e-Health services increases dependence of users on IT thus making any technical default potentially more harmful to the healthcare services delivered. Should shortage of energy occur, the hospital highly relying on IT would be prevented from providing basic care to patients benefitting from acute treatment or in Emergency services. As a result, the UEMS stresses the importance to have reliable products available on the market as well as protocols ensuring an emergency plan in case of default of the technical device or solution.

Objective 4: Support research and innovation in e-Health and development of a competitive European and global market

In your view, how should the European Commission support innovation? (Please choose maximum 3 options)

<i>Support collection, dissemination and analysis of information on innovative healthcare services</i>	62,50%
<i>Provide funding for the scaling up of innovative e-Health solutions, for example by facilitation deployment of research results</i>	56,25%
<i>Provide strategic recommendations to Member States and stakeholders</i>	50,00%
<i>Provide more flexible financing mechanisms to support research and innovation</i>	43,75%
<i>Support user-driven research through use of appropriate financial instruments (for example use of CSO or similar instruments)</i>	31,25%

Comments

Providing a supportive environment to bring up e-Health initiatives and to provide Member States with the services of collection, dissemination and analysis of information on innovative healthcare services will go a long way in assisting the Member States in adopting technologies for the use across Europe.

In your view, in which of the areas listed below should the European Commission cooperate with international partners? (Please choose maximum 3 options)

<i>Stimulate the international policy dialogue to facilitate the deployment of eHealth solutions</i>	56,25%
<i>Taking steps to advance interoperability</i>	56,25%
<i>Promote deployment of telemedicine services</i>	50,00%
<i>Promote the use of EHR</i>	43,75%
<i>Promote benchmarking and evaluation projects in order to provide evidence to support deployment of eHealth solutions</i>	37,50%
<i>Support R&D to advance new innovative solutions (incl. Virtual Physiological Human, Personal Health Systems, ICT for Public Health)</i>	18,75%
<i>Other (please specify)</i> ->Certification of EHR systems	6,25%

Additional comments

The UEMS willingly supports the European Commission in its endeavours to address the issue of ICT for health and to foster collaboration between Member States to improve the delivery of care across Europe. The UEMS welcomes the eHealth Action Plan that the Commission intends to elaborate further to this consultation.

As the UEMS has already stated in its contribution to the Health care workforce (see annex II), the challenges that European healthcare systems are facing today must be addressed. Albeit e-Health solutions can help achieve this goal, some important milestones have to be set in order to benefit fully from the potential offered by ICT in Health.

"The UEMS welcomes the introduction of new technologies where they have a proven benefit for both patients and professionals. It also generally considers that ICT should only be implemented under the condition that it supports and benefits medical work and is adjusted to the needs of patients and health professionals, and that patients and healthcare professionals must be the main beneficiaries of any type of e-health or telemedicine applications.

The UEMS also calls for further clarity to the following issues:

- Involvement from stakeholders, and healthcare professionals in particular, in all stages of the development of ICT tools for health should be an essential basic requirement.*
- The real added value of ICT tools in health should be continuously demonstrated. The UEMS further believes that suitable training of doctors and other health professionals is also vital in the process of implementation of these technologies.*
- European and national regulatory frameworks should be revised and adapted to genuinely deal with the use of these new technologies both at national and cross-border levels and bring legal certainty.*
- The use of e-Health and telemedicine services should adhere to the same professional medical quality and safety standards as those in use for non-electronic healthcare provision, and offer adequate protection to patients."*

Time is an essential aspect in the large scale deployment of e- Health. Using ICT in daily medical practice requires time for health professionals to learn and adapt themselves to the introduction of this new e-Health solution. IT providers must realise that health professionals' time is essentially dedicated to treating patients. e-Health solutions should therefore be considering this important element.

Referring to its Bratislava Declaration on e-Medicine (see annex I), the UEMS strongly support the idea that quality and safety of all e-Health solutions should be guaranteed in order to provide the same quality of care to patients as "traditional" healthcare. For this purpose, legal clarity with regard to the consequences of the use of e-Health solutions should be further improved.

As a matter of principle, the UEMS favours the use of ICT in delivering high quality and safety of care. Still, a sensitive use of any e-Health solution as well as adapted IT solutions will certainly enable ICT to play the role it is expected to: improve the quality of care for the benefit of patients.

***** END *****

ANNEX I

BRATISLAVA DECLARATION ON E-MEDICINE

(UEMS 2009/07)

Adopted 13.10.2007

The UEMS Council notes that e-Medicine has entered the everyday practice of medical informatics, and the healthcare of patients in the European Union and many other countries throughout the World.

The UEMS recognises that e-Medicine has the potential for significant improvements in the quality of patient care, and for the manner in which doctors are able to provide that care. The UEMS believes that these quality issues must have priority over the emphasis on potential cost-efficiencies that have been advocated by other stakeholders.

The UEMS Council believes that the electronic creation, recording, transfer and storage of medical data is useful and inevitable, and will support further progress in the availability of medical and public information, will contribute to higher standards in medical qualification and specialisation, and the promotion of improvements in the wellbeing and healthcare of persons.

However, the UEMS Council is concerned that the misuse of e-Medicine could damage persons, communities and countries through recognised risks to the security of data, confidentiality, medical ethics, and the law. The principles of a patient's privacy and confidentiality must be respected, and only patients have the right voluntarily to decide to have their data held in storage.

Acting on these concerns regarding the electronic creation, recording, transfer and storage of medical information in the European Union, the UEMS Council commits itself to making efforts, using UEMS registration and validation procedures, to implement, promote, develop and control:

- respect for the security and privacy of persons, and the rights and laws governing these
- respect for medical ethical principles,
- the validity of electronic health information, and
- the quality of electronic medical education and training

ANNEX II

UEMS CONTRIBUTION TO THE EC GREEN PAPER ON EU WORKFORCE FOR HEALTH

(UEMS 2009/07 — p.20-21)

Adopted 10.04.2009

NEW TECHNOLOGIES TO SUPPORT DOCTORS IN DELIVERING BETTER HEALTHCARE

The UEMS welcomes the introduction of new technologies where they have a proven benefit for both patients and professionals. Increased use of telemedicine and e-Health has the potential to transform healthcare provision yet also entail possible problems regarding patient safety and confidentiality.

As a whole, the UEMS looks forward to the forthcoming European Commission guidelines and framework on both telemedicine and e-Health which should ensure that these concerns are resolved satisfactorily. The UEMS generally considers that:

- ICT should only be implemented under the condition that it supports and benefits medical work and is adjusted to the needs of patients and health professionals.
- Patients and healthcare professionals must be the main beneficiaries of any type of e-health or telemedicine applications. As a consequence, the European Commission and national governments must ensure that the implementation of new technology in health care is not driven by market forces and the economic interest of the ICT industry.

The development and deployment of new technologies have been dealt with in other EC documents such as the EC Communication on Telemedicine¹. The UEMS welcomed these as they addressed particular aspects in relation to this issue and was particularly pleased by the good and transparent collaborative approach followed by the Commission in elaborating these documents. As it trusts that this is likely to bring the highest level of efficiency and adherence, the UEMS supports the Commission to continue with this kind of approach in all current and future initiatives.

However, the UEMS calls on the European Commission and the Member States to bring further clarity on some of these items:

- Involvement from stakeholders, and healthcare professionals in particular, in all stages of the development of ICT tools for health should be systematic in order to develop applications which are fully for purpose in the medical or clinical field.
- The real added value of ICT tools in health should be continuously demonstrated in order to build up adherence and trust from professionals.

The UEMS therefore calls on European and national authorities to ensure diffusion of transparent and reliable information towards patients and healthcare professionals to expose the opportunities and limitations in the use of ICT technologies in healthcare.

Suitable training of doctors and other health professionals is also vital in the process of implementation of these technologies in order to make the best use of new technology.

- European and national regulatory frameworks should be revised and adapted to genuinely deal with the use of these new technologies both at national and cross-border levels and bring

legal certainty namely as regards the professional responsibility in the use of such technologies.

The UEMS supports the European Commission's intent to address this issue and calls on the Member States to provide its support and effectively collaborate in order to achieve the necessary legal security for healthcare professionals across Europe.

- The use of e-Health and telemedicine services:

-> adhere to the same professional medical quality and safety standards as those in use for non-electronic healthcare provision.

-> offer adequate protection to patients, notably through the introduction of appropriate regulatory requirements for practitioners identical to those in use for non-electronic healthcare provision.

The UEMS formulated proposals to incorporate these concerns into the draft directive on patient's rights in cross-border healthcare². The UEMS is encouraged that these proposed amendments were endorsed by the European Parliament's committee on health and looks forward to their formal adoption by the EP later this month.

NEW TECHNOLOGIES TO SUPPORT DOCTORS IN DELIVERING BETTER HEALTHCARE

CONCLUSION

The UEMS welcomes the introduction of new technologies where they have a proven benefit for both patients and professionals. It also generally considers that ICT should only be implemented under the condition that it supports and benefits medical work and is adjusted to the needs of patients and health professionals, and that patients and healthcare professionals must be the main beneficiaries of any type of e-health or telemedicine applications.

The UEMS also calls for further clarity to the following issues:

- **Involvement from stakeholders, and healthcare professionals in particular, in all stages of the development of ICT tools for health should be systematic.**
- **The real added value of ICT tools in health should be continuously demonstrated. The UEMS further believes that suitable training of doctors and other health professionals is also vital in the process of implementation of these technologies.**
- **European and national regulatory frameworks should be revised and adapted to genuinely deal with the use of these new technologies both at national and cross-border levels and bring legal certainty.**
- **The use of e-Health and telemedicine services should adhere to the same professional medical quality and safety standards as those in use for non-electronic healthcare provision, and offer adequate protection to patients.**

ANNEX III

ADDITIONAL COMMENTS RECEIVED

“The cost benefit ratio of large scale eHealth solution is all in all disastrous according to many international studies. Small local solutions do have a higher potential for getting a positive influence on the health care system.”

Viewpoint to increase Healthcare professionals’ acceptance and awareness:

- *Try to show benefits*
- *Make eHealth systems faster!*
- *The health care professionals want to spend more time with the patient instead of the Computer Terminal.*
- *Make systems simpler!*
- *Better spend money on healing people instead of sponsoring of the IT-Major Corporations*
- *Make systems smaller!*
- *Small steps policy!*

“eHealth solutions can serve Health (and wellness) by improving the efficiency and effectiveness of healthcare processes, the equity and accessibility of healthcare, and the quality and safety of health services. If properly implemented they can even help enhance security and privacy protection.”

“The health authorities and policy makers are the ones who are the less aware of the benefits: action should continue to be taken at that level”

“The EC should involve more health professionals in its initiatives: they are the real domain experts; they best know the needs; they can help model and formalise information and knowledge in medicine and healthcare. To obtain credibility and authority such endeavours should be conducted with the help of recognised (professional and scientific) organisations”

“Before speaking of interoperability, let’s improve operability”

“Efficiency and advancing medical practice to improve the delivery of healthcare – while these benefits are unquestionable, they can only be considered a benefit when patient safety can be assured, along with employment of suitable mechanisms for patient confidentiality, common standards, quality controls and cost effectiveness. Without these, any benefits will be lost.”

“Working with European Medical Associations, National Governments and National Medical Associations in developing these protocols and support aspects of eHealth initiatives will allow greater exposure to the benefits of these measures and to ensure their support of such programs.”

“Increasing awareness among healthcare professionals about the benefits and opportunities eHealth could offer will only pay off, if the preconditions for sensible use of eHealth are also considered”

“The objective 1 lacks an important caveat: eHealth services are different from traditional, face-to-face medical services and the patients have to be informed of “benefits, opportunities and limitations” of eHealth”

“The more time is lost the more systems will grow apart!”

“Healthcare professionals are dependent from their NHS. If each NHS in Europe is not convinced, or obliged, to implement a system of e-health, any action by the professionals will be not useful. It is unwise to think to use patients and professionals to exert a bottom-up push on Governments in this regard. E-health means expense and Governments can be convinced only by a European Directive, oiled by European coverage of a part of the expenses and some benefits”