Study on Digital Health implementation in the EU

Presentation of Digital Health benchmark results

Mai 12th, 2022

The better the question. The better the answer. The better the world works.



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Executive summary

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Context



The French Presidency of the Council of the EU wishes to promote an ambitious agenda on Europe-wide Digital Health issues



Ethics is a prerequisite for building and implementing a strategy



European initiatives in the field of ethics in Digital Health must be leveraged

Main objectives of the study

A comprehensive overview of Digital Health in Europe, with a focus on ethics, to highlight best practices through 3 levers:



State of play on regulatory issues through an in-depth analysis of existing documentation and grey literature

... to better identify the scope of existing regulatory texts, their cross-references, and to provide recommendations



Assessment of countries around 5 guiding principles and 4 ethical dimensions, highlighting findings, best practices and key trends

... to perform an exhaustive analysis of quantitative and qualitative feedback by topic and by country



Feedback collection from EU countries on implemented initiatives and identification of priority areas for improvement at the EU level

...to identify strategic issues which require to establish targets and relevant actions must be carried out at the EU level

Context and methodology

Desk research covering 29 countries

Study's scope

Desk research and EY network feedback

The development of Digital Health has been studied in 29 European countries - the 27 Member States, Scotland and Norway – to provide a comprehensive overview in Europe.





National representatives consultation

National Digital Health representatives from 15 countries have been interviewed to build a first overview of current practices regarding ethics in Digital Health.



Consultation with delegates from 15 countries



5 guiding principles and 4 ethical dimensions





Context and methodology First approach to identify regulatory areas





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Context and methodology Approach to the in-depth regulatory analysis

Revision of the regulatory scope

Overview of the theme involved within the scope of analyzed documents. Distinguishing between analysis reports, good practices, and compulsory requirements

In-depth analysis of the different documents

Comprehensive analysis of the documents and identification of the theme discussed (i.e. with regards to the classification) Analysis of the overlaps between the documents according to each theme In-depth analysis of the themes to highlight sub-themes in order to detail the analysis. Cross-analysis of documents discussing multiple themes.



Defined themes

idențified



Regulatory documents

Added 3 themes following the detailed analysis Added of the documents to clarify their categorization

Added of 6 documents in the scope of analysis



Thematic overlaps

Intersecting references of documents dealing with the same key themes



Summary



Context and methodology



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State of play of Digital Health in Europe

Study's scope



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State of play of Digital Health in Europe Detailed country profile: Belgium (1/4)



Summary of the Digital Health roadmap

Accelerate the accessibility of Digital Health solutions - for patients and healthcare professionals by supporting Digital Health innovation and entrepreneurship

Implement a national Digital Health platform - created for patients and healthcare professionals, funded with €80M by the Ministry of Health and the Health and Disability Insurance system

Finalized projects Ongoing or planned projects

Promote health data sharing - by expanding the use of electronic health records and the interoperability of infrastructure

Key indicators

Patient health record	
E-prescription service	\checkmark
Patient identification system	
Interoperability framework	
Is it enforceable?	×
Security framework	
Is it enforceable?	
Individuals' access to their health data	
HP's access management	
National infrastructure for data collection	
Regulation on secondary use of data	×
Regulation for telemedicine reimbursement	×
 Assessment mechanisms 	



Belgium





Focus on ethics in Digital Health

Base Digital Health on humanistic values

- There are national representatives and frameworks for the security of health information systems – but there is no national database
- There are health expert groups within the Data Protection Authority

- Enable individuals to manage their
 Digital Health use and data
 - There are dedicated tools for the collection of individuals' consent for the use of their health data in the context of care (but not in the context of research)
- The Digital Health Platform includes in its governance a User Consultation Committee which assists the Management Committee by proposing initiatives or security measures to implement
- Initiative about the creation of personal safes through "Solid" technology, where the storage is controlled by individuals and not by healthcare providers

 Make Digital Health inclusive and accessible to all

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- Planned "Empowering individuals" project which aims at ensuring that every individual can understand and use their own data, with two lines of work: Digital Health literacy and specific offices for people impacted by the digital divide (e.g., in post offices)
- Since 2018, Belgian public websites must comply with an established framework for digital accessibility according to the European directive 2016/2102
- Dedicated communication towards individuals on Digital Health and their rights

Implement ecoresponsible Digital Health

 No specific project regarding the environmental impact of Digital Health



State of play of Digital Health in Europe Detailed country profile: Belgium (3/4)



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Strengthen Digital Health Governance



Actors / stakeholders of the ecosystem involved in the construction of the Digital Health strategy (professionals, software publishers e.g. *Agoria*, patients associations, etc.)

Strengthen Digital Health security and interoperability

- National interoperability framework deployed in 50% of healthcare organizations
- Draft regulation on progress regarding secondary use of data however, a *Healthdata.be* platform is already implemented to facilitate and standardise the registration of data for secondary use (research context)

Accelerate the deployment of core Digital Health services

Mobile health application assessment and reimbursement system published in May 2021. There is a website listing reliable mobile health applications and their level of trust: *mhealthbelgium.be*



There is a governance body between institutions and private software publishers (example of *mHealth Belgium* vs *Agoria*)



Public-private collaboration still needs to be improved as highlighted by the disparity of software implementation in hospitals (only 50% of hospitals)



No post-control mechanisms to ensure the enforceability of national reference systems



Data portability is only addressed at a regional level



No authorisation or regulation of telemedicine - however, there is an evaluation system. *Note: Teleconsultations could only be reimbursed during the Covid crisis.*



State of play of Digital Health in Europe Detailed country profile: Belgium (4/4)

about 80% use rate





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Deploy Digital Health platforms at national level



Patient identification with the electronic ID card (100% of the population); identification and authentication service for healthcare professionals (80% use rate)

"MaSanté" (Digital Health.fgov.be), national portal where individuals can

institutions and supported by digital tools deployed at a regional level -

access their health data, including information saved and shared by

healthcare providers, the health insurance fund, or other federal

Support innovation and promote buy-in from all stakeholders

No initial training in innovation and Digital Health for healthcare professionals - however, specialisations are possible (master's degree, double degree, etc.)



Existence of regional services dedicated to document management (80% effective use rate) and secure messaging (10% effective use rate) for patients



e-prescription service (Recip-e), mandatory since 2020 and used by 50% of healthcare infrastructures

e-signatures used in 35% of all health documents



Digital Health Box to collect individuals initiatives about health innovation



Spotlight on the enforceability of national reference systems

The Digital Health platform is used to validate the compliance of Digital Health services with the national architecture standards



State of play of Digital Health in Europe Guiding principles: key findings and main trends (1/5)

Digital Health governance is taking shape through legislation

and dedicated organizations, but individuals are not yet fully

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involved



have defined a national Digital <u>Health stra</u>tegy include users representatives in their governance



Strategies and governance bodies are mainly focusing on the **deployment of core national services.**

2/3 of the countries have a dedicated agency in charge of implementing Digital Health projects.



Some EU countries have set up **committees including health professionals and/or patient representatives**, and providing practical advices on the use and/or assessments of Digital Health solutions.



National digital health strategies focus on developing portals and solutions to **put patient empowerment first**





have a strategic roadmap setting national Digital Health targets propose tools to strengthen individuals' participation in the health decisions which impact them



Countries head towards the creation of a **patient-centered** health system.

In some countries, an **electronic health card** allows the patient to decide which medical data they want to store.



State of play of Digital Health in Europe Guiding principles: key findings and main trends (2/5)

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have created an interoperability framework (based on SNOMED-<u>CT, HL7 FHI</u>R or IHE profiles) have developed a Digital Health security framework, 56% of which have made it mandatory



The interoperability frameworks deployment extent is quite heterogeneous and only 45% of countries have made all or some of them mandatory.



Most countries also **rely on European projects to implement their frameworks** in a consistent European way – especially for the NCPeH project. Desk research covering 29 countries



Strengthen Digital Health security and interoperability

Although regulations have been published, projects and organizations allowing the secondary use of data are not yet implemented





provide dedicated regulation on secondary use of health data

have a national infrastructure to collect and host data for secondary uses



Less than half of the countries already provide a national structure dedicated to hosting and managing health data.

In some of these countries, a **national agency is responsible for processing data requests** and issuing data permits.



State of play of Digital Health in Europe Guiding principles: key findings and main trends (3/5)

Countries are engaged in providing **national public services to support** secured, structured **data exchanges**





rolled out a nationwide Digital Health secured messaging service rolled out a national healthcare provider identification service



E-prescription is mostly deployed in European countries and even mandatory in 5 EU countries.



Secured individuals health messaging services are not welldeveloped in Europe. However, mobile applications have been implemented and offer numerous services to individuals.



Some countries have built a decentralized health system, in which some services could be **deployed in heterogeneous** ways between the regions.



National Digital Health roadmap prioritize the deployment of **national portals to improve data sharing**





deployed a national Digital Health portal allowing <u>individuals</u> to access their data rolled out a national platform dedicated to secondary use of health data



Implementation of a National Patient Record is a priority for most countries. However, disparities still appear regarding the maturity of these projects



Many countries have implemented **Digital Health platforms**, widely used and providing a large range of services and health data (*e*-prescription, pharmaceutical databases, patient data repositories, patient records, teleconsultation etc.)



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State of play of Digital Health in Europe Guiding principles: key findings and main trends (4/5)

Frameworks have been defined and services are provided to secure the **identification and authentication** of patients and healthcare providers





enforce a minimum guarantee for electronic identification to Digital Health services

provide a means to identify <u>healthcare</u> professionals



To ensure secure access to national digital platforms, most countries use a centralized electronic identification system. All but 1 of the Member States provide a unique individual health identifier.



Healthcare professionals and **legal entities index are quite well-implemented** at national levels and allow individuals to easily find the services they are looking for.



Countries are engaged in providing individuals portals to access and manage their health data





Even though GDPR has supported significant progress on access to data, a significant number of countries is not complying with the regulation. Indeed, data portability is far from being ensured and less than half of the countries allow individuals to download their data.



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State of play of Digital Health in Europe Guiding principles: key findings and main trends (5/5)

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reimburse telemedicine appointments, and 38% reimburse mHealth services have enforced regulations on the use of AI for health

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Telemedicine implementation and related regulations have been quickly established during the Covid crisis. Regulations on new technologies such as mobile health applications, digital therapies, or Artificial Intelligence could be developed.



Several countries enforced a regulation allowing the reimbursement of mobile health and some countries enforced a regulation allowing the reimbursement of digital therapies.

Innovation is supported through national and European funding programs



offer specific funds and financing for innovation in Digital Health support the expansion of Digital Health through public research programs

18/29

Desk research covering 29 countries

in from all stakeholders

Support innovation and promote buy-



The vast majority of EU countries **support and encourage health innovation** in various ways.

Some countries already have very strong training and acculturation to innovation, others are developing programs and projects to foster innovation (such as incubators or programs with a focus on digital therapy applications or artificial intelligence).



State of play of Digital Health in Europe Key findings regarding the overarching ethical dimensions





Desk research covering 29 countries

State of play of Digital Health in Europe State of play of European regulation in the field of Digital Health

INTEROPERABILITY

Current regulations provide a framework to set up centralized databases, but offer no specific guidance on interoperability standards

GOVERNANCE

Liability for Digital Health stakeholders has not been comprehensively addressed

FUNDING

Available funding mechanisms do not encompass the whole field of Digital Health, but several EU recovery funds will be dedicated to Digital Health in the coming years

ETHICS

Ethical dimensions, such as sustainability or informing individuals and managing consent, are not specifically addressed by the regulations

- mature

DATA MANAGEMENT

Regulations are well-developed, but could be extended to data altruism issues

DATA PRIVACY

Privacy, consent management, and confidentiality are strictly regulated

SECURITY

Security of digital systems, obligation to inform individuals, and incident management are strongly regulated

+ mature



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Best practices for ethics in Digital Health observed at a national level

Executive summary

Best practices for ethics in Digital Health observed at the national level Study's scope



National representatives consultation

National Digital Health representatives from 15 countries have been interviewed to create a starting overview of current practices regarding ethics in Digital Health and to supplement the comprehensive overview held during the first phase.





Best practices for ethics in Digital Health observed at the national level Scope of study: Consulting national representatives



Consulting national representatives

National Digital Health representatives from 15 countries have been interviewed to get a more thorough view of the current practices regarding ethics in Digital Health.



The objective was to <u>refine the comprehensive overview</u> of the first phase, to detail and illustrate the observations made with a sample of practices or situations encompassing the 4 ethical dimensions analyzed.

3 main reasons have driven this selection:

Restrict the scope to meet the deadlines but with enough diversity to capture patterns representative of the topic

The ambitious agenda of the French Presidency resulted in tight deadlines between the first phase and the presentation to the European representatives. Therefore, it was necessary to select only a few countries reflecting European diversity regarding their size, their geographical situation, their centralized/decentralized organization, etc. Obviously, the approach was not to exclude countries, but rather simply to be representative of the diversity of EU countries.



Collect as many as possible relevant best practices in an efficient way

The countries have been selected according to how easy it was to get in touch with them as well as our prior knowledge of initiatives and best practices already carried out on the field of ethics. An initial scope of 5 countries has been gradually extended to 15 countries (the maximum scope possible for the study) to grasp as many best practices as possible in this field.



Provide a preliminary analysis to be supplemented later

This analysis remains preliminary, without intending to be a basis for decision-making. Rather, it aims to uncover possible ways forward for further study, and to assess Member State-level initiatives and actions carried out involving the 4 ethical dimensions. An exhaustive analysis will be performed prior to monitoring the implementation of European ethical principles for Digital Health.



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Best practices for ethics in Digital Health observed at the national level Base Digital Health on humanistic values (1/2)



innovative solutions

Several countries have implemented ethics committees

dedicated to Digital Health and more particularly to

Base Digital Health on humanistic values



Countries have deployed Digital Health platforms to support data transfers, but they have not been fully designed to meet ethical guidelines





Best practices for ethics in Digital Health observed at the national level Base Digital Health on humanistic values (2/2)

Member States level initiatives

Health portals to provide services improving the overall efficiency of care

- The health portal includes information and advice allowing individuals to better understand their health and data (e.g. explanation of blood test results)
- Individuals can electronically ask for prescription refills
- Secure messaging services are provided so that individuals and healthcare providers can maintain a dialogue between appointments

National platforms to share pseudonymized data for research and AI development while ensuring individuals' privacy

Ethical guidelines shared with Digital Health solutions providers

Ethical guidelines implemented to promote:

- Data transparency, procedures, and decision processes
- Supervision and traceability of algorithms and data
- Respect for fundamental rights when using AI
- > Fair and responsible collection of data





Key areas for improvement

No European mandatory framework containing ethical principles for the design and use of Digital Health Health professionals may not always have an active interest in recording and sharing patient data in national systems



Possible ways forward

Creating certifications for Digital Health providers to ensure ethical processing of personal data Allowing individuals to share their own data, maybe even by including them in a European Digital Identity Wallet

Legend

(I) High priority





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Best practices for ethics in Digital Health observed at the national level Enable individuals to manage their Digital Health use and data (1/2)



Consultation with 15 countries

Enable individuals to manage their Digital Health use and data





Best practices for ethics in Digital Health observed at the national level Enable individuals to manage their Digital Health use and data (2/2)

Member States level initiatives

Patient advisory board co-designing the national health portal's features

Some Digital Health platforms include in their governance an advisory board that:

- involves all health stakeholders
- assists in designing the portal's features

Individuals can prevent healthcare providers from accessing sensitive documents

Access to health records or portals often managed by individuals, with ability to:

- Prohibit access to particularly sensitive or chosen data
- Add data themselves
- Control data access based on a "therapeutic relationship"

Decentralized data exchange system built upon a national index of health data

Some countries provide a national single access point associated with a national health data index. It allows individuals to access all their data while preventing data redundancy by hosting data at the point of care.



Key areas for improvement

Lack of common standardization across the European Union

No European e-ID that supports crossborder data exchanges No real process to listen to individuals and report their wishes

Consultation with 15 countries

Digital Health use and data

Enable individuals to manage their

A lack of representation of the overall population (e.g., youth, healthy individuals)



Possible ways forward

Creating and fostering a single European e-ID Ensuring that all individuals are represented when building a Digital Health service

Legend



Supporting Member States

in deploying shared semantic standards and

common technical

standards for data

exchanges

Medium priority





Best practices for ethics in Digital Health observed at the national level Make Digital Health inclusive and accessible to all (1/2)









Best practices for ethics in Digital Health observed at the national level Make Digital Health inclusive and accessible to all (2/2)

Member States level initiatives

Trusted parties can be appointed by individuals to manage their health data

Several Member States offer an alternative to individuals, who can appoint trusted third parties to access and manage their health data



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Innovations to improve Digital Health accessibility

Few countries include innovative services in their patient portals to facilitate their use, for instance:

- audio description
- sign language interpreting
- multilingual translation in teleconsultation

Public helpdesks

Many countries use public locations (post offices, library, etc.) as help points for the digitally excluded, offering advice or training





Key areas for improvement

Issues raised on improving patients' access to their health data and their ability to understand it or take action No accessibility guidelines for mHealth applications



Possible ways forward

Improving and supporting Digital Health literacy by funding specific programs Tackling the digital divide by accelerating the deployment and appropriation of innovative digital solutions

Legend

🕕 Medium priority





High priority

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Best practices for ethics in Digital Health observed at the national level Implement eco-responsible Digital Health (1/2)



Implement eco-responsible Digital Health



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Although some improvements have been observed in the past few years, very few initiatives exist regarding the reduction of the environmental impact of Digital Health



are requiring the reuse of data through unified collection and storage of health data





None of the countries studied has put an "eco-score" in place to evaluate the environmental impact of Digital **Health services**



Best practices for ethics in Digital Health observed at the national level Implement eco-responsible Digital Health (2/2)

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Member States level initiatives

Digital sobriety criteria applied to Digital Health solutions exchanging data with national portals

Digital Health solutions are registered and can exchange data with national platforms provided they meet a set of sustainability criteria

Mandatory reuse of existing and available digital public components and services

Some of the countries have implemented measures to reduce the energy consumption of digital services:

- Regulations stating that companies developing digital tools must use existing public components and eservices
- Principle of data minimization supporting the unified collection and storage of data





Key areas for improvement

Perceived lack of research to support best practices for reducing the overall energy consumption of the Digital Health ecosystem Obstacles to environmental-friendly measures, given (i) the broader scope of digital sobriety beyond Digital Health, and (ii) the strength of the measures that need to be implemented to respect EU sustainability commitments





Medium priority

Conducting research to find the best ways to reduce the energy consumption of Digital Health Taking inspiration and adapting the European draft declaration "Making the green transition more digital and the digital transition greener" for Digital Health

Legend





High priority

Summary

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Best practices for ethics in Digital Health observed at a national level

Executive summary

Executive summary Main trends observed throughout Europe

Digital Health is a top priority

All countries have established a strategy dedicated to Digital Health, mainly focusing on core national services deployment, telemedicine, and improving the ecosystem's interoperability and security.

Regulation must keep pace with innovation

Digital Health deployment and efficiency may be limited by a lack of coercive regulative frameworks: Few regulations are currently enforced, especially in innovative areas such as mHealth, digital therapies, or AI-based solutions.

Interoperability standards but limited enforceability

Strengthening the implementation and enforceability of interoperability standards is key to improving health data transfers, which would benefit from agreed European standards and could rely on a European e-ID, or even a future e-Wallet.

Ethics is not sufficiently being addressed in Digital Health

Most countries are aware of the challenges regarding ethics but few are directly and comprehensively addressing them. Giving individuals power over their health data and developing innovative solutions (such as AI) still have to be tackled.

Ethics by design is a lever for acceptability

For Digital Health to be actually used, it must be acceptable to healthcare providers and individuals, which relies on their trust in the solutions. Developing ethics-by-design approaches (including all four ethics dimensions) is a lever to improve trust and Digital Health use.

Eco-responsible Digital Health is still largely unexplored

Digital Health sustainability is an emerging matter that EU countries are starting to tackle: Overall, work must be conducted to highlight best practices and strategies focused towards reducing Digital Health energy consumption.



Executive summary

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What are the main avenues for speeding up the development of digital health?

National roadmaps with a common challenge: Getting individuals more involved in digital health

- > Ensure that all categories of individuals are represented in the development of services
- > Develop communication and training, promote practices
- Reduce the digital divide
- Implement ethical prerequisites to earn trust

Develop cross-border data transfers, within the framework of EU

- Deploy semantic and technical standards to exchange health data
- Create a single European e-ID
- Include health data in the European Digital Identity Wallet

Foster a more sustainable, responsible digital health system

- Conduct research on eco-responsibility of Digital Health
- Create certifications for Digital Health

Appendix European ethical principles for digital health

BASE DIGITAL HEALTH ON HUMANISTIC VALUES

- 1. Digital Health complements and optimizes face-to-face healthcare
- 2. Individuals are informed about the benefits and limits of Digital Health
- 3. Individuals are informed about the functioning of Digital Health services and can easily customize interactions with them
- 4. When artificial intelligence is used, all reasonable efforts are made to make it explainable and without discriminatory bias

ENABLE INDIVIDUALS TO MANAGE THEIR DIGITAL HEALTH AND DATA

- 5. Individuals are actively involved in shaping the European and national frameworks of Digital Health and data
- 6. Individuals can easily and reliably retrieve their health data in a commonly-used format
- 7. Individuals can easily get information on how their health data have been or may be accessed and for which purpose
- 8. Individuals can easily and reliably grant access to their health data and exercise their rights, including objection when applicable

MAKE DIGITAL HEALTH INCLUSIVE

- 9. Digital Health services are accessible by all, including by people with disabilities or low levels of literacy
- 10. Digital Health services are intuitive and easy to use
- 11. Individuals have access to Digital Health training
- 12. Digital Health services include support through human communication when needed

IMPLEMENT ECO-RESPONSIBLE DIGITAL HEALTH

- 13. Environmental impacts of Digital Health are identified and measured
- 14. Digital Health services are developed in compliance with ecodesign best practices
- 15. Re-use and recycling of Digital Health equipment is ensured
- 16. Digital Health stakeholders are committed to reducing their ecological footprint



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