

Development of the electronic patient record

Consultation procedure on the revised EPRA, partial comprehensive revision

The electronic patient record (EPR) is to be developed and its prevalence promoted in two stages. The bill on the transitional part of the financing is already at parliamentary stage. The second part includes a comprehensive revision of the content of the Federal Act on the Electronic Patient Record (EPRA). Swiss Post supports the bill incorporating the comprehensive EPR content submitted by the Federal Council for consultation, but calls for more far-reaching organizational adjustments in the EPR landscape.

The comprehensive revision of the EPRA aims to clearly define the roles of the Confederation and the cantons and to ensure the sustainable financing of the EPR. At the same time, a number of measures are planned to develop the EPR in order to increase its prevalence and use. Swiss Post supports the strategic thrust of the current revision. This is necessary and urgent, because with the current legal structure, Switzerland will not be able to exploit the potential of the EPR in the foreseeable future.

Swiss Post has been a leading provider of digital health solutions for several years and is making an important contribution to the digitization of healthcare throughout Switzerland. Thanks to Swiss Post's EPR infrastructure, the public have the option of opening an EPR. It is clear to us that the EPR's value can be further enhanced by additional applications within the EPR itself. With the current organization of the EPR landscape, however, it is currently very time-consuming to introduce new applications.

Contents of the bill

- The bill contains a clear division of tasks and responsibilities between the Confederation and the cantons. The public sector will make a greater financial contribution. In future, the Confederation will coordinate and finance the EPR's development. The cantons are responsible for financing the reference communities. They ensure that at least one reference community is active on their territory.
- In order to promote the use of the EPR, it is planned that an EPR will be opened automatically and free of charge for all persons resident in Switzerland who are covered by compulsory health insurance or military insurance.

However, anyone can choose not to have an EPR (opt-out model).

- All health professionals working in outpatient care will be required to keep an EPR and to record data relevant to the patient's treatment in the EPR.
- With their explicit consent, patients may make the non-anonymized medical data in their EPR available for research purposes.
- Until now, all the data has been stored in a decentralized way in the communities and reference communities. Structured data (e.g. medication data) will in future be stored in a central database operated by the Confederation.
- With the patient's consent, health applications can access the EPR. A health application is an application that can be used to store and/or view medical data in the EPR, such as via a smartphone or medical device (e.g. insulin meter).
- With the patient's consent, health insurers can store administrative data in the EPR.
- The use of a future state e-ID (electronic proof of identity) to access the EPR is also planned.

Swiss Post holds the following viewpoints

In our view, this draft contains correct and important proposals for content-related development. Swiss Post will continue to invest in the EPR, provided that sustainable funding can be obtained.



Division of tasks and funding moving in the right direction

We believe it is right that the EPR should be a public service. From our point of view, the public sector needs to be more involved and committed, because the EPR is too expensive. A functioning market could not be established as desired.

Further organizational adjustments needed in the EPR landscape – Swiss Post's demands

Swiss Post is calling for more far-reaching adjustments to the EPR landscape so that it can be financed sustainably and introduced more quickly:

1. **Focus on a uniform technical infrastructure** throughout Switzerland in order to reduce technical redundancies, improve synergies and reduce the current high level of complexity in its implementation (in particular due to interoperability requirements).

2. **The number of reference communities should be kept to a minimum.** The more the resources can be bundled together, the lower the costs will be for the cantons, and in turn for the citizens.

3. **A review of the governance model is recommended.** We have taken note of the fact that the Confederation has reviewed its constitutional competencies and its options for the development of the EPR. Based on the keyword "OneEPR", a variant was also discussed in which the operation of the EPR would be the responsibility of a single reference community operating throughout Switzerland. We believe that the Federal Council, when revising the bill following this consultation, should examine in detail what opportunities and risks the creation of the "OneEPR" would have for the development of the EPR landscape, taking into account the competencies of the cantons in healthcare and as part of a future digital public service provided by the public sector.

As an enterprise affiliated with the Confederation, Swiss Post is required and able to offer its platform throughout Switzerland on behalf of and under the supervision of the Confederation and the cantons.

Other content-related points

- Doing away with the "dual voluntary action" makes sense: from Swiss Post's point of view, the EPR can deliver its greatest possible benefits if as many healthcare stakeholders as possible are integrated into the EPR system and feed information into the EPR.
- In our view, the proposed developments in terms of content are positive. However, from the point of view of the system provider, we also need to point out that the planned development places many new demands on the current platform, especially as many questions currently remain unanswered and there are still numerous inconsistencies and contradictions that will only be clarified with a revision of the regulations.
- In our view, the planned central database for structured data should not be operated by the Confederation, but rather by a platform provider or a reference community. This would eliminate the need for new interfaces and time-consuming synchronization.
- We suggest that the electronic identification of credentials (IDM) for the EPR, which are already certified and in use on the market today, be integrated into the AGOV project, and in turn also be used for other sovereign portals belonging to the Confederation and the cantons. AGOV is the authentication service of the Swiss authorities. For example, people who access their EPR today with an EPRA-certified IDM would not be able to use that IDM to access other Confederation and cantonal applications.

