



## **Release Feedback Report**

### **Electronic Transfer of Prescription 1.0 Second draft for consultation**

#### **Introduction**

The National e-Health Transition Authority (NEHTA) e-Medication Management program has been tasked to develop key specifications required for General Practitioners, Pharmacists and Software Vendors to establish a national environment for standardised electronic prescription exchange; one where prescriptions can be sent securely and reliably to community pharmacists, while maintaining the consumer's right to confidentiality, and their choice of pharmacy.

Through consultation with government bodies, clinicians, healthcare organisations, professional peak bodies and software industry stakeholders, the e-Medication Management program subsequently developed draft Electronic Transfer of Prescription (ETP) specifications.

On 30 October 2009 NEHTA commenced a national consultation process in order to gather national feedback on the draft ETP specifications. Feedback from this review was used to inform the e-Medications Management program in preparation for this second draft for consultation, in July 2010.

#### **Findings**

Overall feedback from stakeholders on the ETP Draft Release 1.0 has been positive. The majority of questions submitted by stakeholders sought clarification on scope and detail.

Many respondents commented that documents in the release were of high quality and fit for purpose. However, several comments dealing with the technical specifications indicated that some stakeholders believed the specifications were too prescriptive.

#### **Methodology**

Stakeholders were primarily consulted via a release of the first ETP Draft Release 1.0 on the NEHTA website. Responses to the specifications were invited via direct email. Feedback was requested by 10 December 2009. It was highlighted that priority areas for feedback included errors of omission or commission, inconsistent descriptions and editorial rule concerns. The release note also notified stakeholders of forums which would provide interested parties with clarification on the specifications, prior to their providing specific feedback. The feedback received was reported to the e-Medications Management Reference Group to discuss the prevailing themes and appropriate responses to address the concerns. A working group was then established to analyse the responses in more depth. If positions stated by specific stakeholders were conflicting, NEHTA arranged to discuss these matters on an individual basis with the specific stakeholder(s).

#### **Respondents**

Responses were requested for all of the ETP Draft Release 1.0 documents. Feedback was generally provided for the package as a whole and was document-agnostic, although some submissions provided feedback on specific documents.

Of the stakeholders responding, approximately 30% were from government, 30% from the vendor community, 30% from peak bodies and associations, and the remaining 10% were from specialty colleges.

All but one respondent provided feedback on a confidential basis.

### **Analysis**

A common theme concerned strategic issues re governance, ownership of data, incentives, interoperability, and scope. Respondents sought more clarity on these issues and more information. In response, NEHTA reaffirms its role, both to engage with stakeholders in developing more detailed, comprehensive specifications, and to facilitate the informed adoption of e-health initiatives within the healthcare sector. NEHTA acknowledges the importance of these issues, is working within the existing legislative and regulatory framework, and will escalate any new matters or issues that change the current framework to the Department of Health and Ageing.

Differing views were expressed in relation to the rights and responsibilities of prescribers and dispensers. This primarily affects how prescription and dispense information is generated and transmitted to Prescription Exchanges whilst paper and electronic processes co-exist. Overall, the dominant view from professional bodies is that the roles of prescribers and dispensers should remain separate and distinct.

Three documents that were produced to supplement the ETP draft package have received specific comment, particularly from industry with regard to the ETP Endpoint Specification. These are the ETP Endpoint Specification (Web Services Specification), e-Prescription Structured Document Template (SDT), and the Dispense Record Structured Document Template. The key issue is the proposed use of a new specification to support repository-based storage of documents where the ultimate recipient of the information is unknown to the sender. The proposed approach differs from previous specifications already agreed with industry, which are designed for point-to-point document transmission. While the issues raised are valid they are outside of NEHTA's current approach and therefore NEHTA will undertake broader and more detailed consultation with industry on these components.

A number of stakeholders also provided suggestions for improvements to the ETP draft specification and constructive comments were given on ways to address concerns. The feedback also indicated that there is support to move the industry forward towards a Clinical Document Architecture (CDA).

### **Use**

The feedback on the ETP Release 1.0 has informed the e-Medications Management program where changes may need to be incorporated into the Draft Release 1.0 specifications. The feedback also highlighted the need for NEHTA to continue to engage with stakeholders, and ensure there is clarity regarding the scope of the ETP package, and to address concerns that were not incorporated in the first draft release.

Consequently, e-Medication Management specifications will be iteratively released to support the timely, secure and consistent transfer of medication information between healthcare providers, as outlined in the NEHTA Strategy 2009-2012 available at the <http://www.nehta.gov.au> website.

### **How to get more information**

Readers are invited to contact [medication.management@nehta.gov.au](mailto:medication.management@nehta.gov.au) to discuss the Electronic Transfer of Prescription Release 1.0 specifications in further detail.