Development of the electronic patient record

Swiss Post's position on transitional funding and consent

The electronic patient record (EPR) is to be developed and its widespread use promoted in two stages: firstly, with a comprehensive revision of the Federal Act on the Electronic Patient Record (EPRA), and secondly, with transitional funding until this comprehensive revision enters into force. Swiss Post supports the bill on transitional financing and consent. The bill is currently being discussed in Parliament.

Under the legal provisions in their current form, the EPR cannot achieve its full potential. For this reason, the EPR needs to be developed as a matter of urgency. To facilitate this, the Federal Council is planning a comprehensive revision of the EPRA. However, it will take several years – probably until 2027 – before this enters into effect. Transitional funding for the reference communities will bridge this gap until the comprehensive legal revision enters into force.

Swiss Post is making a major contribution towards digitizing the healthcare sector. For several years, we have been committed as a system provider to a beneficial, successful EPR. We are confident of the EPR's potential as the core of a digitized healthcare system.

Swiss Post is continuously developing its EPR and equipping it for new applications and plans to continue running it in this way in the future. Swiss Post intends to maintain a strong position in the EPR environment. For this reason, Swiss Post acquired a majority participation in the operating company Post Sanela Health AG in autumn 2022. By taking this step, Swiss Post is paving the way for a uniform EPR infrastructure, as with regard to sustainable funding for the EPR, Swiss Post believes the EPR's current decentralized architecture with multiple redundant technical infrastructure elements and operational organizations is not financially viable in the long term.

Contents of the bill

Within the scope of the transitional funding, the Confederation will provide financial assistance of up to 30 million francs to support operation and development of the EPR by the reference communities until the comprehensive revision of the EPRA enters into force. This financial support is subject to the cantons providing co-funding of at least the same amount. The level of financial support a reference

community receives is based on the number of EPRs opened. The amount per EPR opened has been set at a flat rate of 30 francs.

Finally, the bill aims to permit other forms of consent in order to digitize and simplify the opening process.

Swiss Post holds the following viewpoints

Transitional funding to bridge the gap is vital

We believe that transitional funding to bridge the gap is the right measure at this point, particularly because the reference communities are financially unstable, the valuable progress made on the EPR needs to be maintained and the investment made so far needs to be secured. In the best-case scenario, the financial assistance will also accelerate widespread use of the EPR. The EPR already works from a technical perspective, but no funds are available for urgently required content-related developments.

However, we believe that the EPR's financial viability will be secured in the long term mainly through additional applications in the EPR itself and structural changes in the EPR landscape, rather than through financial support.

Addition of two further criteria to the financial support model

We do not believe it is appropriate to make financial support dependent solely on the criterion of the number of EPRs opened. In addition to the opening of a patient record by the patient, the number of healthcare organizations actually registered as EPR users in the Health Provider Directory (HPD) and consistent development of the system, including with relevant services, are also key factors. In light of this, we propose the inclusion of two additional criteria in the structuring of financial support:

 The number of connected, publishing service providers in a reference community that effectively supply the EPR with content. This is because the connection and active participation of service providers in the ecosystem are crucial for the further proliferation of the EPR among the population.



November 2023

2. **Integration of additional services (e.g. e-medication)**. The provision of greater benefits by the relevant services is a key requirement for the EPR's future success.

Digital onboarding as a key step in achieving widespread use of the EPR

To simplify the opening process and to accelerate widespread use of the EPR, other forms of electronic consent are planned to be permitted in future. Swiss Post welcomes this step in the right direction.



November 2023