
HIQA's public consultation on draft recommendations on a model for health information standards to support the delivery of health and social care services in Ireland

Thank you for the invitation to participate in HIQA's public consultation on draft recommendations on a model for health information standards to support the delivery of health and social care services in Ireland. As the independent statutory regulator of pharmacists and pharmacies in Ireland, the PSI welcomes the opportunity to input on initiatives that support access to safe, high quality and reliable healthcare for patients.

We recognise that effective information and communications technology (ICT) has a critical role to play in healthcare delivery, by ensuring that information to drive quality and safety in health and social care settings is available when and where it is needed. We agree that the current ICT infrastructure in Ireland's health and social care sector is highly fragmented with major gaps and silos of information which is preventing the safe, effective transfer of information. We also recognise the compounding factor that there is no single organisation with a mandate to develop, implement and promote the adoption of health information standards across all health and social care settings. We are aware of the limitations of HIQA's current remit in relation to assessing compliance of health information standards across the system.

The PSI welcomes the recent announcement that the Department of Health has received Cabinet approval to develop the general scheme of a Health Information Bill with the aim of ensuring that Ireland has a fit-for-purpose national health information system. We note that the proposal will support the introduction of a National Health Information Agency with clearly specified functions and governance rules in relation to the collection and processing of health information for population health purposes and research and innovation that leads to better outcomes for patients.

As the regulatory body for pharmacists and pharmacies, we are aware of the daily challenges that the current ICT infrastructure presents for all health and social care professionals. For pharmacists, who provide direct care to patients across the health system, these challenges include a lack of timely access to a patient's medication history, diagnoses and relevant associated contemporaneous information to ensure a full and accurate clinical check can be performed before deciding to dispense prescribed medication, or to make a recommendation about non-prescribed treatments. We are also aware that there is still a heavy reliance on paper-based records and documentation within pharmacies, although this has transitioned somewhat with the electronic transfer of prescriptions via Healthmail.

We agree that there is a clear and pressing need to develop a coherent and integrated approach to health information, based on standards and international best practice. We support the recommendations developed by HIQA in this regard. In particular, we agree that strong strategic

oversight and governance is needed to manage the end-to-end lifecycle of technical standards development, implementation and adoption.

We also recognise that our overall health system having a mix of public and private providers poses significant challenges in ensuring full interoperability and interconnectedness across the system. Interoperability between health information systems is a pre-requisite for the realisation of integrated care, as envisaged by Sláintecare. We agree that using a strategic standards-based approach is fundamental to defining, structuring and providing semantics for health information, to enable service providers and service users to share health information regardless of the system they are using. We agree that all of the systems involved need to use a common language or standard to communicate and that it is essential that this is supported by widely adopted health information standards being implemented throughout the national health information system.

Pharmacies, as privately owned health care providers, use ICT systems which are not integrated or connected with those used in other areas of the health and social care system. As the only definitive source of information on medication dispensed to patients in the community setting, as well as other important health information, it is essential that any future proposed health information standards or ICT solutions intended to enable the sharing of health information consider access and input by pharmacists, as relevant to their roles in the provision of services and care to patients, including those services that will develop as envisaged by Sláintecare.

We look forward to continuing to work with HIQA in the future in assuring patient and public health and safety. In particular, we remain available to engage with HIQA and other relevant stakeholders in relation to advancing the national health information agenda and in identifying end user considerations for a national health information system, from both the perspective of registered pharmacists and pharmacies, and of patients accessing pharmacy delivered care and services.

PSI – The Pharmacy Regulator, PSI House, Fenian St, Dublin 2, D02TD72

July 2022