

22 November 2013

Our ref: 131120-RRMD-PB

Richard Royle
Panel Chair
Review of Personally Controlled
Electronic Health Record (PCEHR)
Via email: pcehrreview@pcehrreview.gov.au

Dear Mr Royle,

The Australian Physiotherapy Association (APA) strongly supports the move to develop a Personally Controlled Electronic Health Record. We believe that that a well-designed and easy to use system will improve the health of Australians through increased sharing of critical health information to appropriate health professional at the point of care, both in the primary and tertiary setting. It is important to ensure that all relevant health care providers are considered when looking at the development of the PCEHR, and this submission outlines some of the issues encountered by the physiotherapy profession.

Consultation with the physiotherapy profession during the development phase of the PCEHR

Physiotherapy is an important part of the Australian health system, and as such has been involved in numerous consultations around eHealth and the PCEHR. A representative from the APA was involved in the development of the PCEHR through the clinical leads program, and the APA had input into a number of forums in addition to its written submissions.

At that time, the APA expressed concern about several issues that would impact on the profession's ability to adopt to the PCEHR system in day to day clinical practice. Some of these were addressed in collaboration with the APA, but many were not addressed. These included:

- Lack of a history of support in the computerisation of physiotherapy practices
- Lack of widespread use of electronic clinical record keeping
- Lack of communication about the PCEHR to the profession
- Little recognition of the role of physiotherapists in team care
- Physiotherapists' inability to input information into a patient's PCEHR
- Recognition of software compatibility issues for software used by physiotherapists in clinical practice

To date, the APA has worked with NEHTA and other organisations to increase communication around the importance of the PCEHR in clinical practice, however many of the other issue have not yet been addressed.

PCEHR use by physiotherapists

While providing input into the development of the framework around the PCEHR, the APA warned that physiotherapists have not been part of programs to facilitate the use of computers or technology within the clinic. Unlike GPs, physiotherapists have not received government support through programs such as Practice Incentive Program (PIP) and e-PIP to assist in the computerisation of practices. Despite this, most physiotherapy practices use office management software - however only around 30 per cent of these practices use computers for clinical record keeping. This has not been addressed over the years of development of the electronic health record and thus limits the number of physiotherapists that can be engaged in the PCEHR, impeding the overall quality, effectiveness and success of the system.

The APA is concerned that physiotherapists only have access to the PCEHR through the read-only web portal. While feedback from the APA membership is that this portal is well designed and user-friendly, being unable to enter any information into the record is frustrating and risks reducing the uptake by the profession at a critical point in the development of the PCEHR. The system needs to allow two-way communication between all healthcare providers

Data in both the header and the content must also be stored in a format that is searchable to facilitate ease of use.

Barriers to increasing usage in physiotherapy

The physiotherapy profession is currently unable to use the PCEHR through the commonly available practice management or electronic record-keeping software. This is the biggest barrier to physiotherapists' use of the system, and it is vital that program vendors are facilitated to develop their software to support user-friendly access to the PCEHR.

The APA believes that

- More work needs to be done to communicate to the profession
- Data entry of healthcare identifiers must be kept to a minimum – manual entry of identifiers is problematic, time-consuming and subject to error
- Recognition of physiotherapists as primary healthcare providers and key parts of healthcare teams must be built into the system

Key clinician utility and usability issues

Reiterating the points above, the APA believes that the following are barriers to the usability of the PCEHR:

- Lack of integration into current clinical workflows
- Lack of computers in the consulting room
- Read only access
- No ability to enter data into PCEHR Event Summaries

Recommendations to accelerate adoption of the platform

The APA recommends that:

- The online web portal allow physiotherapists to input data into the PCEHR
- Software vendors are approached to develop their software platforms to enable physiotherapists to access the PCEHR
- Physiotherapists be financially supported to increase their level of computerised clinical record keeping
- Physiotherapists be recognised as primary care providers when planning clinical workflows with the PCEHR
- Support for practices to adapt to use of the PCEHR through Medicare Locals continue

Despite the issues with the development of the PCEHR, the APA continues to support their importance, and sees it as a critical enabler of quality health care. For more information on this submission, please contact Paula Bateson, Senior Policy Officer, paula.bateson@physiotherapy.asn.au, 03 9092 0833.

Yours faithfully,



Marcus Dripps
President