

PRACTICE INCENTIVES PROGRAM (PIP) eHEALTH INCENTIVE

QUESTIONS AND ANSWERS

Overview:

What is the PIP eHealth Incentive?

The PIP eHealth Incentive aims to encourage general practices to keep up to date with the latest developments in eHealth.

Where can I find more information about the PIP eHealth Incentive?

If you would like more information on this or other PIP incentives, or an application form, please visit the website www.medicareaustralia.gov.au/pip/ or contact the PIP Enquiry Line on free call 1800 222 032 (call charges apply from mobile and pay phones only).

Your local Division of General Practice may be also able to provide more information on the use of electronic health information systems.

Payment and eligibility:

Am I eligible for the PIP eHealth Incentive?

To be eligible for the PIP eHealth Incentive, the practice must:

- participate in the PIP;
- have a secure messaging capability provided by an eligible supplier;
- have (or have applied for) a location/site Public Key Infrastructure (PKI) certificate for the practice and each practice branch, as well as ensure that each medical practitioner from the practice has (or has applied for) an individual PKI certificate and use these certificates to securely send and receive information via the practice's messaging system where possible; and
- provide general practitioners from the practice with a range of key electronic clinical resources which are accessible at the point of consultation.

Note: practices will be given additional time to provide evidence of secure messaging capability (Requirement 1) for the August 2009 payment only. See below *When can I start accessing payments through this incentive?*

What payments are available under the PIP eHealth Incentive?

A payment of \$6.50 per Standardised Whole Patient Equivalent (SWPE) per year is made to practices that meet the requirements of the PIP eHealth Incentive. Payments are capped at \$12,500 per practice per quarter (\$50,000 per practice per year).

Payments are made by Medicare Australia to eligible practices as part of each quarterly PIP payment in February, May, August and November.

When can I start accessing payments through this incentive?

The first payment through the PIP eHealth Incentive will be available to eligible practices in the August 2009 payment quarter.

Payments are made retrospectively. For example, practices that meet the PIP eHealth Incentive eligibility requirements on 30 April 2009 and maintain their eligibility throughout May, June and July will be eligible for payment in August 2009.

For the August 2009 payment only, practices will be given additional time to provide evidence that they meet Requirement 1 (secure messaging). Practices will have until 31 July 2009 to meet Requirement 1, rather than 30 April. However, practices will still need to meet Requirement 2 (PKI certificates) and Requirement 3 (electronic clinical resources) by 30 April 2009 to be considered for the August 2009 payment.

For all payments from August 2009 onwards, practices will need to meet all three eligibility requirements at the point in time to be eligible for a payment. The 'point in time' corresponds to the last day of the month prior to the next quarterly payment month. For instance, the point in time for the November quarterly payment is 31 October.

Do the payments go to the practice or the GP?

The payments for the eHealth incentive are made to the practice.

Do I need to submit evidence of the key electronic clinical resources my practice provides to practice GPs?

No, however the practice must be able to substantiate its claim for payments. This may include documentary evidence of the key electronic clinical resources maintained by the practice. Medicare Australia may request this information at any time for auditing purposes.

My practice meets most of the requirements. Will we receive a payment similar to the tiered payments through the Information Management/Information Technology (IM/IT) incentive?

No. There are no tiered payments for the eHealth incentive. Practices must meet all of the requirements to receive a payment.

Note: practices will be given additional time in 2009 to provide evidence that they meet Requirement 1 (secure messaging) for the August payment. Practices will have until 31 July 2009 to meet Requirement 1, rather than 30 April.

What should I do if any changes occur that may affect my practice's eligibility for this incentive?

Medicare Australia should be advised in writing, within 14 days, of any changes that may affect your practice's eligibility for the eHealth incentive. All changes should be signed by the authorised contact person nominated on the application form.

Can Medicare withhold my practice's payments?

Yes. Payments to practices may be withheld by Medicare Australia for a number of reasons, including:

- non-compliance;
- change of ownership;
- expiry of accreditation status; and

- incomplete or inaccurate practice details.

If practices do not provide the information requested by Medicare Australia, PIP payments may be withheld. If the issue relates to eligibility to participate in the PIP, all PIP payments will be withheld. If the issue relates to a specific incentive, only payments for the relevant incentive will be withheld. Once the required information is provided and the practice is assessed as eligible for payments, Medicare Australia will release the payment(s).

If the practice remains ineligible for payment(s) at three (3) consecutive 'points-in-time' the practice will be withdrawn from the PIP, or the relevant PIP incentive(s).

If the issue (reason for payments being withheld) is subsequently resolved following a practice's withdrawal from the PIP, the practice will need to complete a new application form to re-join the PIP or the incentive(s) from which they were withdrawn. Practices rejoining the PIP will need to be fully accredited to receive PIP payments. In all cases where a practice is withdrawn from the PIP or from a particular incentive(s), withheld payments will be forfeited.

Application:

<p>NOTE: Details of eligible suppliers will be available from 14 April 2009 at www.nehta.gov.au/pip-vendors. Practices will need this information to complete their application forms and are advised not to submit the forms without it.</p>
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How do I apply for the PIP eHealth Incentive?

Practices can apply for this incentive through Medicare Australia at the time of joining the PIP by completing the relevant parts of the *PIP & GPIT* application form, or at any other time by completing the *eHealth Incentive* application form. Both forms are available at www.medicareaustralia.gov.au/pip or by telephoning 1800 222 032.

The person nominated by the practice as the authorised contact person is required to complete and sign the relevant parts of the application form.

My practice is in the process of seeking accreditation. Can I apply for this incentive now?

Yes. The practice can be registered for accreditation against the Royal Australian College of General Practitioners (RACGP) *Standards for general practices* when they join the program. However, the practice must be fully accredited within 12 months of joining the PIP.

My practice is currently participating in the IM/IT Incentive. Will I automatically be approved for the eHealth incentive?

No. The eHealth incentive has new requirements. All practices will need to apply for the PIP eHealth Incentive by completing the *eHealth Incentive application* form.

The new PIP eHealth Incentive will replace the existing PIP IM/IT Incentive from August 2009. The final quarterly payment for the PIP IM/IT Incentive will be made to practices in May 2009.

Public Key Infrastructure (PKI):

What is PKI?

PKI is a combination of policies, procedures and technology allowing health care providers to transfer information and images between computers safely and securely.

How can I get PKI?

PKI certificates are available free of charge from Medicare Australia. Please contact the relevant enquiry line on 1800 700 199.

Why should I use PKI?

The main benefit is allowing you to send and receive health information securely and privately. With PKI you know for sure:

- who sent the message (authentication);
- that the content hasn't changed between sender and receiver (integrity);
- that the sender stands behind the message (non-repudiation); and
- that only you, as the intended receiver, can open the message.

Why do we need PKI location/site and individual certificates?

PKI location/site and individual certificates are used for different purposes. A PKI location/site certificate can be used by the practice for activities such as billing. Individual certificates will be required to allow doctors to electronically send referrals, participate in electronic prescribing and electronic pathology ordering as soon as these tools are available.

How many PKI certificates do I need?

The practice must have a location/site PKI certificate. In addition, each medical practitioner from the practice must have an individual PKI certificate and use these certificates whenever possible to securely send and receive information via the practice's messaging system.

Practices with additional practice branches must have a separate location/site PKI certificate for each practice branch.

Do locums need an individual PKI certificate?

No. Practice locums are exempt from the eHealth Incentive requirement to have an individual PKI certificate.

However, it is important to note that locums are able to obtain an individual PKI certificate from Medicare Australia if they wish, and are encouraged to do so. Locums who obtain an individual PKI certificate will be able to take it with them when they move practices. This is because individual PKI certificates are linked to specific people rather than to locations. Only PKI location certificates are linked to the location and are not transportable.

Is PKI free?

Yes. Medicare Australia is currently sponsoring free PKI certification for all health care providers (including allied health practitioners such as physiotherapists and chiropractors, but excluding alternative care practitioners). Digital certificates for health care locations are currently free (one per health care location).

Can my practice use PKI certificates from sources other than Medicare Australia?

No. Only PKI certificates issued by Medicare Australia meet the eligibility requirements of the PIP eHealth incentive.

If our practice or one of our practice GPs has applied for a PKI certificate, but has not received it at the time of application, can we still apply for this incentive?

Yes. In recognition of the potential time lags between registration for PKI and receipt of a certificate for all members of the practice team, compliance simply requires practices to apply to Medicare Australia for a PKI certificate.

Secure messaging:

Why does my practice need to adopt a secure messaging system?

Secure messaging systems are a key building block for connectivity and interoperability throughout the health system.

Developments in this technology in the short to medium term will include the capacity to integrate information from a variety of sources into a patient's health record and allow the creation of a shared summary health profile. In the near future, possessing this technology will enable practices to receive electronic discharge summaries, pathology reports, send electronic referrals and orders, receive specialist reports, participate in electronic prescribing and communicate more broadly across the health sector.

Why does my practice need both a secure messaging system and PKI certificates?

The combination of PKI and secure messaging provides the necessary level of security for the secure transfer of personal health information.

PKI has been established as the authentication standard by the National E-Health Transition Authority (NEHTA). NEHTA and the medical software industry commenced work in March 2009 towards finalising secure messaging standards which will ultimately become Australian Standards.

Broader adoption of these standards also lays the foundations for future developments in eHealth and aligns with the National eHealth Strategy.

How can I find out if my secure messaging provider meets the eHealth Incentive requirements?

Practices need to visit the NEHTA website at www.nehta.gov.au/pip-vendors to find out if the supplier of either their practice management system or their messaging service is an eligible supplier for the purposes of the PIP eHealth Incentive.

NOTE: A full list of eligible suppliers will be available at www.nehta.gov.au/pip-vendors from 14 April 2009. Practices should not be concerned if their supplier does not appear on the first listing on 14 April but should recheck the listings periodically. Practices are reminded that they have until 31st July 2009 to comply with the messaging requirement and that this timeline was developed to give NEHTA and suppliers time to complete the approval process.

My secure messaging provider is not one of the approved suppliers listed on the NEHTA website. Am I still eligible for the eHealth Incentive?

No. To be eligible for eHealth payments the practice must possess secure messaging capability provided an eligible supplier – subject to the arrangements for the August 2009 payment quarter only (refer to note above).

Our practice needs to update our system to ensure the secure messaging is from an approved supplier. How long do I have to complete this?

Practices must meet the secure messaging eligibility requirement, Requirement 1, by 31 July 2009 (and have previously met Requirements 2 and 3 at 30 April 2009) in order to be eligible for payment in August 2009.

Practices will be provided with additional time to meet the secure messaging requirement, to enable time for suppliers to confirm their eligibility with NEHTA.

Practices must advise Medicare Australia within 14 calendar days if they do not meet all the eligibility requirements on 31 July 2009.

Electronic Clinical Resources:

What are the electronic clinical resource requirements for the PIP eHealth Incentive?

To be eligible for the eHealth Incentive, the practice must provide all medical practitioners in the practice with access to:

- the current version of at least one key electronic clinical resource from each of the following categories (minimum of three resources in total):
 - evidence-based guide to recommendations about patient management that covers all common disorders seen in general practice
 - formulary of medicines available in Australia, providing comparative drug information reflective of contemporary Australian general practice, and independent of pharmaceutical company involvement
 - evidence-based guide to preventive activities in general practice which is relevant to the Australian population; and
- at least three resources from any of the following categories:
 - journal of evidence-based clinical care
 - clinical resources (latest editions)
- regulatory resources (latest editions).

It is important to note that the resources must be available on the computer desktop in the consulting room either on the hard drive, as a CD-ROM, or as a direct link to a website.

Do I need to submit evidence of the key electronic clinical resources my practice provides to practice GPs?

No, however the practice must be able to substantiate its claim for payments. This may include documentary evidence of the key electronic clinical resources maintained by the practice. The practice must ensure that all practice GPs are able to explain how they can access and use the key electronic clinical resources.

In addition, practices are also required to provide information to Medicare Australia as part of its ongoing audit program to verify that general practices meet PIP eligibility criteria.

How can I make sure my practice is using the most current edition of a clinical resource?

It is up to the practice to ensure they have the most up-to-date information available. Where possible, practices may wish to check with their software supplier, the publisher of the electronic document, or the relevant organisation (such as RACGP) what the most current edition of a given resource is. The practice may also consider providing a direct link to the relevant website on the practice's desktop in order to access the most current information and updates. The Pharmaceutical Benefits Schedule, for example, can be accessed and utilised completely online.

Is there a comprehensive list of every electronic clinical resource which meets the requirements of the PIP eHealth Incentive?

No. A list of every eligible electronic clinical resource could not keep up to date with new additions, could not take every eligible clinical resource into account, and may be seen to favour specific products.

It is up to the practice to determine which electronic clinical resources meet the specific eligibility criteria of the eHealth Incentive and the unique needs of their patients and practice setting.

Please refer to the *PIP eHealth Guidelines* for examples of relevant resources.

My electronic resources are provided by a software supplier who has notified me that they meet the eligibility requirements of the PIP eHealth Incentive, but I am concerned that the resources do not match the descriptions listed in the *eHealth Incentive Guidelines*.

It is up to individual practices, rather than software suppliers, to determine whether electronic clinical resources meet the eligibility requirements of the PIP eHealth Incentive.

There are a number of options for practices to source the required electronic clinical resources, including from software suppliers, websites, or direct from the publisher. So long as the latest versions of the required electronic clinical resources are available to the practice GPs electronically, and these resources match the category descriptions listed in the *PIP eHealth Guidelines*, practices will have met Requirement 3 – Access to Key Electronic Clinical Resources.

Appeal:

Can I appeal a decision regarding the PIP eHealth Incentive?

Yes. The PIP has established an appeals process. To appeal any decision made in regard to the PIP eligibility or payments, the practice must write to Medicare Australia within 28 calendar days of receiving notice of the decision it would like reviewed. Medicare Australia will review its decision and advise the practice of the outcome in writing.

Advice on further avenues of appeal is available from Medicare Australia.