



My Health Record Policy templates, legal requirements and implications for Rural and Remote Doctors

Although rural and remote doctors are not generally involved with developing and reviewing of My Health Record (MHR) policies, they do need to understand their legal and organisational responsibilities. The following are the key elements that make up an organisation's My Health Record policy documentation and should be understood by practicing doctors:

- Organisational structure, access flags and its implications for group practices and hospital networks
- Internal audit mechanism to validate appropriate use of the system undertaken on a regular basis.
- Regular policy review with version control (i.e. annually and as a result of major changes)
- Disclosure responsibility in line with Privacy Principles
- What Clinical Records system does the organisation use and is it MHR compliant?
- User logins and management (who does this? What happens when staff leave?)
- The added need for strong passwords in conformant clinical records software because authentication to MHR happens inside this software.
- There is a commitment to regular training for existing staff and induction training for MHR is a policy commitment.
- Does the organisation use the MHR Provider Portal (eg context of aged care and access to medical records when away from practice)
- Doctors who access the MHR through other organisations need to understand their compliance responsibilities with respect to each organisation they work for.
- Complaints mechanisms.
- Acronym definition:
 - RO - Responsible Officer: the officer of an organisation who is registered with the national Healthcare Identifier (HI) Service and has authority to act on behalf of the Seed Organisation and relevant Network Organisations (if any) in its dealings with the System Operator of the My Health Record system.
 - OMO - Organisation Maintenance Officer: the officer of an organisation who is registered with the HI Service and acts on behalf of a Seed Organisation and/or Network Organisations (if any) in its day-to-day administrative dealings with the HI Service and the My Health Record system.
 - HPI-O - Healthcare Provider Identifier – Organisation: Is the identifier for organisations that deliver healthcare (such as hospitals or general practices) and is required for the MHR.

- HPI-I - Healthcare Provider Identifier - Individual: a healthcare provider with a valid HPI-I is able to perform all functions within the MHR, except the administration functions that are managed by the RO or OMO.
- HPD - Healthcare Provider Directory: provides a means for healthcare organisations and individuals registered with the HI Service to search for contact details of other registered healthcare providers and organisations.
- HPOS - Health Professionals Online Services: is a web-based service provided by Medicare via the Provider Digital Access (PRODA) portal. that allow providers to send and retrieve various types of information to/from Medicare.
- NASH - National Authentication Service for Health: is an identification certificate for Healthcare Provider Organisations that is required for organisations to access the My Health Record system. It is a secure way to authenticate the organisation to the system.

The following links provide further information for more detailed investigation:

<https://www.myhealthrecord.gov.au/for-healthcare-professionals/howtos/roles-and-responsibilities>

https://www.myhealthrecord.gov.au/sites/default/files/dh-overview_policies_to_participate_20180817.pdf

<https://www.digitalhealth.gov.au/about-the-agency/digital-health-cyber-security-centre/information-security-guide-for-small-healthcare-businesses>

https://www.myhealthrecord.gov.au/sites/default/files/template_policy_-_my_health_record_system_security_and_access_policy_20160928_0.docx?v=1522828650

<https://www.myhealthrecord.gov.au/for-healthcare-professionals/clinical-software-summary-sheets>

<https://www.myhealthrecord.gov.au/for-healthcare-professionals/howtos/register-your-organisation>

https://www.aapm.org.au/Portals/1/documents/Digital_Health/My_Health_Record-Practice_Managers_Receptionist_Webinar_18Jul2018.pdf

http://www.amsant.org.au/wp-content/uploads/2018/10/MyHealthRecord_Security-and-Access_Policy_20181031.docx

https://www.ntphn.org.au/web_images/docs/Getting-Started/20160223%20My%20Health%20Record%20Security%20and%20Access%20Policy%20Template%20V1.3.docx

<https://www.cesphn.org.au/documents/filtered-document-list/55-assisted-registration-tool-policy-template/file>

<https://ww2.health.wa.gov.au/About-us/Policy-Frameworks/Search?site=policyFrameworks&searchStr=mhr&pn=&fr=999&df=&dt=&sb=Relevance&do=DESC>

<https://www.oaic.gov.au/privacy/privacy-assessments/ehealth-system-access-security-controls-of-seven-healthcare-provider-organisations/>

https://www.privacy.org.au/Campaigns/MyHR/docs/PCEHR_110912_Concept_of_Operations.pdf