



24 January 2022

Dear Sir / Madam,

Draft National Healthcare Interoperability Plan: AIIA Submission

Thank you for the opportunity to provide feedback on the Draft National Healthcare Interoperability Plan.

About the AIIA – Health Policy Advisory Network

The AIIA is Australia's peak representative body and advocacy group for those in the digital ecosystem. We are a not-for-profit organisation to benefit members, and AIIA membership fees are tax deductible. Since 1978, the AIIA has pursued activities to stimulate and grow the digital ecosystem, to create a favourable business environment for our members and to contribute to Australia's economic prosperity.

We do this by delivering outstanding member value by:

- providing a strong voice of influence
- building a sense of community through events and education
- enabling a network for collaboration and inspiration; and
- developing compelling content and relevant and interesting information.

We represent technology organisations of all shapes and sizes all around Australia, including:

- Global corporations such as Apple, Adobe, Dell EMC, Deloitte, Gartner, Google, IBM, Infosys, Intel, Lenovo, Microsoft and Oracle
- Multinational companies including Optus and Telstra
- National organisations including Data#3, ASG and Technology One; and
- a large number of small and medium businesses, start-ups, universities and digital incubators

Some 92% of AIIA members are small and medium Australian businesses and 8% of AIIA members are large Australian companies and multinational corporations

The members of the AIIA Health Policy Advisory Network (PAN) focuses their activities on fostering stronger collaboration between the Australian ICT industry, state and federal government and healthcare sector stakeholders to support the development of eHealth solutions.

AIIA Response

Interoperability Principles

1. Do you support the Interoperability Principles in section 3.1, or should some principles be amended, added or removed?

The AIIA is broadly supportive of the Interoperability Principles outlined in Section 3.1 of the proposed plan. The only additional provision the AIIA recommends including is that the Principles be subject to ongoing review for the duration of the plan, so as to ensure any progress will lead to optimal outcomes.

Implementation Actions

2. Are there any key actions missing to promote the objectives of this Plan? (A consolidated list of actions can be found in section 10)

The AIIA recommends that the Plan make provision for further engagement and upskilling of later career medical practitioners. Lack of exposure to some new technologies and management systems may over time prove to be detrimental to patient care, as this will create gaps in patient medical records and undermine efforts to create a comprehensive digital healthcare management system.

The AIIA recommends that the Plan engage directly with key stakeholder groups, such as the Consumers Health Forum of Australia, accrediting medical colleges and specialty medical societies, to build trust in the safety of consumer data and accessibility of a digitally connected healthcare system.

3. Would you like to see any changes to the scope or timeframe of the proposed actions?

Under Section 7.1 (The case for reform), the AIIA recommends that the Plan clearly identifies its target audience for its education and engagement activities. This will provide clear guidance for all stakeholders on where immediate priorities lie in actioning the Plan.

The AIIA would welcome the opportunity to engage with Australia Digital Health Agency as it seeks to implement the Draft National Healthcare Interoperability Plan in the months ahead.

Yours Sincerely,



Cameron Cumming
Chair – AIIA Health PAN
Australian Information Industry Association