

- i. **Data and information:** The Bureau will examine ways to increase access, use and sharing of digital health data and information, including by considering how shared data standards, data and information exchange, data portability and interoperability can improve the competitive landscape and accelerate the development and adoption of digital health care.

On the topic of **data and information**, the Study will aim to answer the following:

- a. Are there barriers (regulatory or non-regulatory) that are preventing the access, use and sharing of digital health data and information? How have these barriers impacted the competitive landscape for digital health care?

The current landscape regarding privacy, security and sharing is constantly evolving and is confusing to the average user. Lack of knowledge in this respect is a barrier to use for individuals and lack of clarity increases non-compliance for smaller/ start-up providers, which is a risk to the public. Both are barriers to healthy and sustainable growth in digital health care.

- b. What changes can be made to reduce barriers to the access, use and sharing of digital health data and information? How can this encourage more competition and innovation in digital health care?

A simple and clear standard is essential to confidence in the industry. Annual certification would enable adaptation to the changing landscape. Seeing certification would give confidence to consumers. An important part of this would be have communicate what the certification means to the consumer.

- ii. **Products and services:** The Bureau will examine issues related to the development, approval, procurement and commercialization of digital products and services intended for use by health care providers and patients. In addition to exploring issues that may be preventing the introduction and adoption of digital products and services in the market, the Bureau will also examine barriers that are restricting or limiting innovation, and consider how pro-competitive rules can reduce those barriers.

This question group appears to focus on medical devices. As such we will not comment.

On the topic of **products and services**, the Study will aim to answer the following:

- a. Are there barriers (regulatory or non-regulatory) that are restricting the range and scope of digital health products and services available for use by health care providers and patients? How have these barriers impacted the competitive landscape for digital health care?

The process for review and approval of medical devices is clear but very lengthy. Guidelines that paramedical

- b. How do rules regarding the development and approval of digital products and services impact their availability and use? What steps can be taken to facilitate the development and approval of digital products and services?
- c. How do procurement and commercialization processes impact the ability for businesses to innovate and compete in the market for digital health care products and services? How can more innovation and competition be encouraged?

- iii. **Health care providers:** The Bureau will examine the ability of health care providers to deliver digital care to patients. The Bureau will explore issues related to billing codes, compensation, licencing, and scope of practice, and consider opportunities to increase access to care.

On the topic of **health care providers**, the Study will aim to answer the following:

This question group appears focused on the use of technology by publicly funded physicians. As such we will not comment.

- a. Are there barriers (regulatory or non-regulatory) that are restricting the ability of health care providers to deliver digital health care to patients? How have these barriers impacted the competitive landscape for digital health care?
- b. How do billing codes and compensation mechanisms for health care providers impact the delivery of digital health care? What steps can be taken to facilitate digital health care delivery?
- c. How do rules regarding medical licencing impact the ability of health care providers to deliver digital health care? What steps can be taken to further enable the delivery of digital health care?
- d. How do rules regarding the scope of practice for health care providers impact their ability to deliver digital health care to patients? For whom and how can the scope of practice be modified to further enable the delivery of digital health care?