



# My Health Record Participation Obligations Checklist for Private Hospitals

**This checklist supports private hospitals already registered and connected to the My Health Record system.**

Healthcare organisations may be required to provide evidence of how they comply with these obligations.

This checklist is not exhaustive and covers a selection of obligations from the [My Health Records Act](#) and [Rule](#). More information on My Health Record Participation Obligations are available [here](#).

To access the digital version of this document as well as other resources, go to [myhealthrecord.gov.au](http://myhealthrecord.gov.au) and search for 'My Health Record Participation Obligations Checklist'.

For assistance, contact the Help Centre on 1300 901 011 / [help@digitalhealth.gov.au](mailto:help@digitalhealth.gov.au).

## Governance

- Record of Responsible of Officer (RO) \_\_\_\_\_
- Record of Organisation Maintenance Officer/s (OMO): \_\_\_\_\_

### Note:

- Each organisation can have only one RO but can have multiple OMOs.
- When a RO and/or OMO/s leave the organisation, ensure they are replaced either through HPOS or submitting the [HW040 form](#) to Services Australia.
- More information on roles and responsibilities is available [here](#).

## Registration of seed organisation (and network organisation/s, if applicable):

- Where possible, your organisation should ensure copies of successful registrations (for the HI Service and the My Health Record system) and associated certificates are kept securely and/or accessible via the Provider Digital Access (PRODA) portal.

**Note:** Registration details can now be managed via Health Professionals Online Service (HPOS), accessible via the Provider Digital Access (PRODA) portal. You will need a PRODA account to access HPOS. You can register for a PRODA account [here](#).

- Retain a record of HPI-O number/s for the seed organisation (and network organisation/s, if applicable)
- Assign the role of Certificate Manager within the organisation to ensure security certificates are managed and maintained.
- If relevant, ensure access flags are managed in HPOS. More information on access flags is available [here](#)



## Manage access to the My Health Record system

### Software and conformance

There are three ways authorised healthcare providers can view and/or upload to the My Health Record system. Please be aware of the different ways your organisation can access the My Health Record system:

- Integrating your local system with the My Health Record system
- Using [conformant software](#)
- Using the [National Provider Portal](#) (NPP)

If your organisation has integrated its local system with the My Health Record system:

- Retain a copy of the Conformance and Compliance Declaration Form submitted to the Australian Digital Health Agency.
- Retain a copy of the Production Access Letter from the Australian Digital Health Agency.

**Note for HIPS Users:** Production Access for HI Service conformance is inherited

### Identification of staff and clinicians

- Document level of access granted to authorised staff and clinicians.
- Ensure there is a process for identifying who in the organisation has accessed the My Health Record system at a particular time. This process must be included in the organisation's My Health Record system policy.

**Note:** Check if your local system or conformant software keeps a record of access.

If your organisation is uploading documents to a patient's My Health Record:

- Ensure Healthcare Provider Identifiers-Individual (HPI-Is) are managed within software and can be used to identify authorised staff and clinicians.

**Note:** As part of staff onboarding, ensure details of healthcare providers are entered correctly (as per AHPRA details) to ensure HPI-Is can be matched.

If your organisation is viewing My Health Records only:

- Ensure a unique local identifier can be used to identify authorised staff and clinicians.

**Note:** A list of requirements relating to managing user accounts and identification of staff is available [here](#).

## Policy and procedures

As part of meeting the legislative requirements to participate in the My Health Record system, organisations need to have a My Health Record system policy, which addresses a number of areas, including access to the My Health Record system and training for staff, before they access the My Health Record system.

- Ensure your organisation has a current My Health Record system security policy.

**Note:**

- A checklist of things to include in your policies and procedures is available [here](#), as well as sample policies [here](#).
- More information regarding 'Ongoing Participation Obligations' is available [here](#), and includes a link to a sample policy that your organisation can adapt to meet the needs of your organisation.
- More information regarding privacy and security legislation is available [here](#).



Regarding the consent for uploading clinical documents, an organisation must:

- Not upload a clinical document to the My Health Record System where an individual has withdrawn consent to the uploading of that clinical document.
  - Only upload a clinical document to the My Health Record system that has been prepared by a person who is a registered healthcare provider (i.e. has an HPI-I) and whose registration is not conditional, suspended, cancelled or lapsed.
- Ensure the patient administration system or clinical information system provides the ability to support the withdrawal of consent, which might be implemented at a number of different levels (e.g. patient, episode and/or report level).
- Note:** The organisation has the flexibility to implement the level of consent (e.g. patient, episode and/or report level) that suits their need and how consent will be captured (e.g. paper/software system).
- Ensure staff and clinicians are familiar with the process for withdrawal of consent and preventing information being uploaded to the My Health Record system.

## Training

Training should provide information about how to use the My Health Record system within your organisation to ensure the My Health Record system is accessed accurately, and responsibly, and should include privacy training.

- Ensure My Health Record system training is organised for all authorised staff and clinicians before they first access the system.
- Ensure ongoing My Health Record system training is available to authorised staff and clinicians.
- Ensure My Health Record training is reviewed to ensure it is current and updated as required (i.e. if new functionality is introduced into the system).

**Note:**

- The Australian Digital Health Agency has developed a [Recommended Training Checklist and Declaration](#) with links to training resources. There is also a range of specific communication materials, which can be access on the Australian Digital Health Agency's [stakeholder materials](#) page.
- The Australian Digital Health Agency is available to provide face-to-face or remote education sessions to groups of clinicians and staff within your organisation. Your organisation can request education and training support using an [online form](#).

## Incidents

An incident is an event or circumstance that resulted, or could have resulted, in unintended and/or unnecessary harm to a patient and/or a complaint, loss or damage. An incident can be related to safety, usability, technical, privacy and/or security issues. The incident may relate to the My Health Record system directly, or the behaviour of clinical software when interacting with the My Health Record system.

- Ensure an incidents management process has been implemented by your organisation. This process must be included in the organisation's My Health Record system policy.

**Note:** Call the My Health Record Helpline 1800 723 471 (option2) if your organisation has had an incident or data breach relating to the My Health Record.



## Patient complaints

- Ensure a process to manage patient complaints regarding My Health Record has been implemented by your organisation. This process must be included in the organisation's My Health Record system policy.

## For further information and support

### My Health Record General Enquiries

#### My Health Record Enquiry Line

☎ 1800 723 471  
(option 2 for providers)

#### For help with:

- ✓ registration enquiries for My Health Record
- ✓ general enquires or concerns relating to the My Health Record system (e.g. privacy and security)
- ✓ clinical safety related enquiries

### Healthcare Identifiers (HPI-Is, HPI-Os, IHIs)

#### Healthcare Identifier Service Enquiry Line

☎ 1300 361 457  
✉ healthcareidentifiers@humanservices.gov.au

#### For help with:

- ✓ registering your organisation as a Seed or Network and getting a Healthcare Provider Identifier – Organisation (HPI-O)
- ✓ registering as an individual healthcare provider and getting a Healthcare Provider Identifier – Individual (HPI-I)
- ✓ digital credentials (Medicare and NASH PKI certificates)

### Digital Credentials (Medicare Certificates, NASH PKI Certificates)

#### eBusiness Service Centre

☎ 1800 700 199  
✉ ebusiness@humanservices.gov.au

#### For help with:

- ✓ enquiries relating to Medicare and NASH PKI certificates
- ✓ installing your Medicare and/or NASH PKI certificates
- ✓ locating lost or forgotten passwords for PKI certificates and tokens

### Clinical Software Technical Support

#### Contact your clinical software vendor

#### For help with:

- ✓ clinical software technical support and trouble shooting (e.g. error messages)
- ✓ installing Medicare and NASH PKI certificates

### Digital Health General Enquiries

#### Australian Digital Health Agency Help Centre

☎ 1300 901 001  
✉ help@digitalhealth.gov.au

#### For help with:

- ✓ registering for My Health Record via the Digital Health Online Forms tool
- ✓ using the My Health Record eLearning platform and clinical software simulators (On Demand Training)