

# PIP QI Exemption Fact Sheet– general practices

## What is the PIP QI Incentive Exemption?

The PIP QI Incentive exemption is an exemption from the requirement for the general practice to submit PIP QI Eligible Data Set to its local PHN for an exemption period because either:

- My general practice's Clinical Information System is not able to submit data using my local PHNs data extraction method; or
- My general practice has chosen not to use my local PHNs data extraction method.

General practices that are granted the exemption must continue to comply with all other PIP eligibility requirements and all the PIP QI Incentive eligibility requirements.

If granted, an exemption will stay in place until the earlier occurring of 31 July 2020 or the date a solution to extract and submit the PIP Eligible Data Set meeting the requirements of the PIP QI Guidelines and PIP Eligible Data Set Data Governance Framework and your local PHN requirements for receiving and storing the PIP Eligible Data Set securely (**Solution**) has been implemented (**Exemption Period**).

General practices seeking an exemption will need to:

- Commit to developing, within the Exemption Period, a Solution. This may involve working with their clinical information system (CIS) provider, other relevant software vendors, and/or their local PHN
- Acknowledge that they are fully responsible for developing the Solution, including for any cost, time, resources or liability arising from it and that their local PHN is not required to contribute financially to developing or maintaining the Solution
- Acknowledge that the exemption is time limited, and that they will comply with all other eligibility requirements for PIP and the PIP QI Incentive during the exemption period, including in relation to continuous quality improvement activities.

## How does a general practice know if they need to apply for the exemption?

When you contact your local PHN they will ask you what clinical information system your general practice is using. They will let you know whether your clinical information system can provide data directly to their PHN. You can then work with your PHN to choose which way you want to electronically submit the PIP Eligible Data Set.

If your clinical information system does not have the capability to provide data directly to your local PHN or you prefer to not use the data extraction method offered by your local PHN, your PHN may advise you to apply for the one-off time limited exemption. You will then develop a Solution which may involve working with your clinical information system provider, local PHN and / or other software providers to create a submission process. Your PHN will advise you on an appropriate submission process that aligns with their requirements for accepting and receiving data securely. During this time, if you are granted an exemption, and provided you continue to meet all other eligibility requirements, you will still be eligible for the PIP QI Incentive.

## How does a general practice apply for the exemption?

General practices should apply direct to the Department of Health via the exemption application form that is available on the Department of Health webpage.

Step 1: A general practice downloads the exemption application form from the [Department of Health webpage](#)

Step 2: Complete the form in conjunction with the general practice's [local PHN](#)

Step 3: Ensure the form is completed and signed

Step 4: Email the completed form to the [practicesupport@health.gov.au](mailto:practicesupport@health.gov.au) inbox by the relevant date specified for that quarter

Step 5: Await to receive email confirmation from the Department of Health as to whether the exemption has been granted or not.

## When does a general practice need to submit the exemption form by?

In order for a general practice to be eligible to be considered for an exemption applying from a relevant quarter they must submit the completed exemption application form to the Department of Health by 11.59pm on:

- 15 October 2019, for exemption commencing for submission of data for quarter ending on 30 October 2019
- 15 January 2020, for exemption commencing for submission of data for quarter ending on 31 January 2020
- 15 April 2020, for exemption commencing for submission of data for quarter ending on 30 April 2020
- 15 July 2020, for exemption commencing for submission of data for quarter ending on 31 July 2020

General practices are only required to submit one application form to be eligible for the entire Exemption Period. They are not required to submit a new application every quarter.

The application form must be completed in conjunction with the general practice's local PHN.

## How will a general practice know if they have been granted an exemption?

Once the general practice has submitted the exemption application form, the Department of Health will review the application and determine whether the exemption is granted or not. The Department will email the general practice and the relevant PHN to inform them whether the exemption has been granted or not.

## How long is the exemption for?

The one-off exemption is available until 31 July 2020.

It is intended that in relation to each general practice an exemption, once granted, will stay in place until the earlier occurring of 31 July 2020 or the date a Solution has been implemented.

For the avoidance of doubt, from 1 August 2020 all general practices participating on the PIP QI Incentive are required to submit PIP Eligible Data set to their local PHN each quarter.

For example if a general practice applies for and is granted the exemption within the first quarter (by 15 October 2019) they will be exempt from submitting the PIP Eligible Data Set to their local PHN until 31 July 2020 (unless a Solution is developed sooner).

### **What happens if a general practice is able to submit data during the exemption period?**

If a general practice has implemented a Solution to submit the PIP Eligible Data Set then the exemption will cease from the time the Solution is implemented and the general practice will no longer be exempt from the requirement to submit PIP Eligible Data set to its local PHN each quarter.

### **Do general practices still receive the PIP QI Incentive payment during the exemption period?**

A general practice who is granted the exemption will still be eligible to receive the PIP QI Incentive payment without submitting the PIP Eligible Data Set to their local PHN provided that the general practice meets all the other requirements of the PIP and PIP QI Incentive.

### **What happens if a practice has not developed a solution to submit the data by the end of the Exemption Period (ie by 31 July 2020)?**

From 1 August 2020 general practices are no longer exempt from the requirement to submit PIP Eligible Data set to their local PHN each quarter. General practices are reminded that this is a core eligibility requirement for the PIP QI Incentive. Please refer to PIP and PIP QI Incentive application form in relation to terms and conditions applying to the Program.

### **How will general practices undertake continuous quality improvement activities in partnership with their local PHN during the Exemption Period?**

If a general practice has been granted an exemption they will still need to comply with all the other eligibility requirements of the PIP QI Incentive. This includes undertaking continuous quality improvement (CQI) activities in partnership with their local PHN.

In order to meet this requirement, PHNs can assist general practices in interrogating their clinical information system data and undertaking CQI activities based on their patient population needs.

PHNs can assist general practices in doing this however they are not responsible for funding a solution that allows general practices to interrogate their data, therefore general practices will be responsible for working with their PHNs and agreeing on a method of data interrogation that suits both the PHN and the general practice.

### **How will a general practice develop a data extraction and submission solution that complies with the PIP QI Guidelines and the PIP Eligible Data Set Data Governance Framework?**

General practices will need to, within the Exemption Period, develop a Solution that complies with:

- the PIP QI Guidelines and PIP Eligible Data Set Data Governance Framework, including that a PIP QI Eligible Data Set must only contain de-identified data; and
- their local PHN requirements for receiving and storing the PIP Eligible Data Set securely.

This may involve working with their clinical information system provider (CIS), other software vendors and/or local PHN to implement a Solution that can provide data directly to their PHN.

General practices will need to liaise with their local PHN in relation to their requirements for receiving and storing the PIP Eligible Data Set securely.

The Department has also established a PHN Data Working Group that is further considering data extraction and submission processes where a third party data extraction tool is not used.

### **Will a general practice need to sign a data sharing agreement?**

Your local PHN may ask your general practice to enter into a data sharing agreement with the PHN. Your general practice may want to obtain independent legal advice before signing this agreement. Your general practice principle or owner should ensure the most appropriate person signs the data sharing agreement.

### **What is a general practice's responsibility as a local data custodian if they choose to not use/cannot use their PHNs preferred data extraction method?**

Under the PIP QI Incentive, general practices are the local data custodians of the PIP Eligible Data Set and are governed by the [PIP Eligible Data Set Data Governance Framework](#). General practices that do not use their PHNs preferred data extraction method assume different responsibilities to those that do use their PHNs extraction method, namely they are responsible for the de-identification, extraction and submission of the PIP Eligible Data Set in accordance with the PIP Eligible Data Set Data Governance Framework.

Local Data Custodian (who chooses not to use PHNs preferred data extraction method)

DESCRIPTION: Participating general practices control collection, use, access, privacy and security of data at the general practice level and are designated local data custodians.

ROLE: Ensure the accuracy and completeness of the data contained in their clinical information systems and use it to improve the quality of patient care outcomes. Extract the PIP Eligible Data Set

RESPONSIBILITY: All general practices have sensitive, personal information and health information about patients contained in their clinical information system and/or paper filing system. General practitioners have existing professional and legal obligations to ensure the information contained in their patient files is current, accurate, securely stored, and confidential. Accredited general practices also obtain specific patient consent for transferring health information to third parties for quality improvement and clinical audit activities. These responsibilities do not change for general practices participating in the PIP QI Incentive.

General practices will also be responsible for ensuring robust data extraction of the PIP Eligible Data Set from the general practice's clinical information system for submission to the general practice's local PHN. General practices will also ensure prompt installation of all security updates or patches in their information technology systems. General practices will need to ensure that an individual's privacy is protected in the process of preparing and supplying the de-identified data from the clinical information system to the local PHN.

General practices must ensure that they use robust data extraction tools that de-identify patient information so they can confidently share that information with third parties. All data custodians must comply with the [best practice guides](#) issued by the Australian Digital Health Agency in 2019.

Data custodians and data extraction companies detail who is responsible for which aspects of confidentiality, integrity and availability, including but not limited to, transfer protocols, secure delivery, access authentication, audit trails, and management of data breaches. Data custodians consider strategies to mitigate cyber security incidents, including the applicability of the [Essential Eight](#).

### **What may be the additional responsibilities of a general practice developing its own Solution?**

Consistently with the PIP Eligible Data Set Data Governance Framework, it would be generally expected that if a general practice implements its own Solution to submit the PIP Eligible Data Set to its PHN, the general practice will assume more of the risks and responsibility associated with the data extraction (including de-identification of data) and secure storage and submission process. General practices who implement this approach are also expected to retain responsibility for the timely installation of security updates. If a general practice chooses to use the PHNs preferred method of data extraction, then it would generally be expected that the PHN will assume more of the responsibilities detailed above.

More information on the roles and responsibilities of each data custodian is detailed in the [PIP Eligible Data Set Data Governance Framework](#).

### **Did you know that?**

- General practices can choose the data extraction method of their choice provided that it complies with the PIP Eligible Data Set Data Governance Framework and the PHNs requirements for receiving and storing the PIP Eligible Data Set securely
- Some clinical information systems can submit direct to their PHN
- PHNs can provide assistance to you in setting up a submission system that meets all the requirements of the PIP Eligible Data Set Data Governance Framework
- Some PHNs offer free data extraction methods