DSCI Submission to NHA's consultation paper on Operationalising Unified Health Interface (2022)

DSCI provided comprehensive feedback on the National Health Authority's consultation paper titled **"Operationalising Unified Health Interface in India"** in **2022.** The policy team's observations recognized UHI as a progressive step toward empowering consumers and enhancing healthcare delivery services through an open and interoperable platform. DSCI Policy team's analysis focused on building an open market and creating level playing fields for various network participants while identifying potential challenges in UHI operationalisation.

DSCI's examination of the consultation paper revealed the proposed framework addressed multiple elements including search and discovery, service booking, service fulfilment, payments and settlements, rescheduling and cancellations, grievance redressal mechanisms, and scoring systems. Our observations noted that these elements aimed to create an open and transparent healthcare marketplace but required careful consideration of competitive dynamics and innovation incentives.

The primary concern centred on the prevention of preferential treatment approaches outlined in the consultation paper. DSCI Policy team's assessment suggested that such approaches might prove counterintuitive to innovation and service quality improvements. The team's recommendations proposed that UHI consider adopting alternative models that incentivized innovation by network participants while maintaining uniqueness of business operations and ensuring respect for intellectual property rights. This approach would balance market openness with innovation promotion.

DSCI's suggestions for promoting healthy competition included devising comprehensive competition policy frameworks that incentivized data sharing and data portability. The team's observations emphasized prioritizing non-price factors of competition and incorporating these parameters into scoring mechanisms to create level playing fields between established players and startups. The policy team's recommendation centred on preventing abuse of monopolies rather than creating artificial monopolistic structures, with information flow and innovation serving as primary competition drivers within UHI.

On technical recommendations, our team addressed standardization requirements for making UHI truly open and interoperable. Our suggestions included standardizing UHI networks based on best global practices and devising standards for data sharing on Fair, Reasonable, and Non-Discriminatory terms. As DSCI, we emphasized the need for careful distribution of privacy responsibility and ownership to enhance trust and ensure predictable responses in case of expectation breaches. We also advocated for included automating monitoring systems and introducing artificial intelligence and machine learning techniques for tracking transaction conformance with UHI policies. DSCI Policy team's suggestions proposed leveraging policy-based automated governance techniques, utilizing orchestration and observability methods to ensure efficient platform operations and compliance monitoring.

Our security and privacy recommendations formed a crucial component of the feedback. The team's observations stressed on network policy frameworks that must clarify data privacy and data security aspects to acquire consumer trust throughout transaction lifecycles. Suggestions included incorporating security and privacy considerations in design phases, ensuring careful integration during development operations, and maintaining strong postures against evolving threats. Given that network participants might lack adequate resources and knowledge to maintain security and privacy standards, the team's recommendations emphasized UHI's significant responsibility in maintaining the platform's decentralized nature.

On healthcare marketplace dynamics, we recognized unique challenges in creating open networks for health services. We noted that healthcare services differed significantly from traditional e-commerce in terms of trust requirements, service quality implications, and regulatory compliance needs. On payment and settlement systems within UHI, we recognized the need for secure, efficient, and transparent financial transactions in healthcare contexts. Our suggestions included implementing robust verification systems and ensuring compliance with healthcare-specific financial regulations.