

COCIR contribution to the Public Consultation on the
Evaluation of the Directive regarding patients' rights in cross-border care

COCIR – the European Trade Association representing the leading industries in the medical imaging, radiotherapy, electromedical and health ICT sectors, fully supports this European Commission [EC] [initiative](#) to assess the performance of the Directives [2011/24](#) and [2012/52/EU](#).

Overall comments

COCIR considers the EC effort timely and necessary. We urge the EC to promote solutions which enhance the simplification of administrative processes within and across Member States, in order to make cross-border care more accessible to citizens.

The evaluation aims to identify persisting barriers in the provision of cross-border healthcare. It also targets the European Reference Networks and their benefits on the diagnosis and treatment of patients with rare and complex diseases.

Barriers stemming from lack of information

A number of challenges arise as patients have difficulty in accessing information on how to correctly establish their administrative files in order to submit them to the healthcare providers either of the treatment Member State or of the Member State of insurance, or both.

COCIR calls on the EC to foster a harmonised and simplified approach to cross-border patient-care, with regard to administration, treatment, cross-country payments and reimbursement. Such an approach would be based on [i] enhanced interoperability of administrative and healthcare systems within and across Member States, as well as on [ii] streamlined standards and requirement - including on [e-]prescription requirements

Applied interoperability between healthcare systems means health data transfer in an easy, secured and lawful manner -including test, diagnosis and treatment results as well as medical expenses. COCIR, therefore, urges the EC to promote interoperability through [i] value-based innovation and joint procurement [ii] the complementarity of EU funding tools, and [iii] the country specific recommendations of the European Semester. Such efforts would significantly downsize all types of healthcare costs and would easily improve the access to and quality of healthcare provision.

To strengthen cooperation in cross-border healthcare provision COCIR calls upon Member States and regions to significantly invest in connectivity and the deployment of healthcare infrastructure, equipment and solutions. The

European Regional Development Fund and the Cohesion Fund are two examples of EU instruments that can help to reduce the existing inequalities in access to care and technology. By prioritising investments that facilitate cross-border diagnosis and care concrete changes are being made for patients across Europe that directly and immediately benefit their health and quality of life.

Taking account of the digital transformation it should also be encouraged that the Member State of treatment would no longer be supplying patients with written medical records of their treatment, but instead make them available and accessible in an electronic way.

The importance of ERNs

The COVID-19 pandemic has illustrated the importance of cross-border cooperation. It has also showcased the added-value of digital health and triggered its intensive uptake.

Against this backdrop, ERNs valorise the digital health solutions enabling the diagnosis and treatment of patients with rare and complex diseases. Moreover, the Clinical Patient Management System (CPMS) platform allows clinicians to [i] safely upload patient cases and [ii] collaborate with their colleagues across borders to provide their patients with optimal healthcare.

Most importantly, ERNs can provide urgent diagnosis with no need for the patient to travel. In this vein, they can promote an equal and universal access to a healthcare of quality in a secured, eco-friendly and economical setting.

Moreover, ERNs can greatly contribute to the establishment of the European Health Data Space. Coupled with concepts such as PROMs (outcomes), PREMs (experience) and PRIMs (clinical safety incidents), ERNs would leverage the use of Real World Data, data commons and data stewardship, promoting health research and innovation.

For these reasons, COCIR is fully supportive of ERNs and encourages the extension of their scope to cover more diseases, such as more common types of cancer as has been proposed in the Europe's Beating Cancer Plan.

[COCIR](#), together with its members, will continue to contribute to this European Commission initiative, providing our full support. Moreover, we call on the European Commission to organise a specific stakeholder consultation with our member industries and look forward to becoming informed on the results and planned next steps.