

# POLICY MAPPING ON eHEALTH POLICIES AND INITIATIVES (INCLUDING ON CANCER CARE) IN **SWITZERLAND**

This Country Factsheet was prepared for the eCAN Joint Action. It is prefilled with publicly available information and was sent for review to country experts on eHealth and cancer care. The Country Factsheet serves as the basis for the preparation of an overview of eCAN relevant policies and initiatives in all EU and EEA countries.

**eCAN is a Joint Action (JA) of 16 partners in EU-Member States** on 'Strengthening eHealth including telemedicine and remote monitoring for health care systems for cancer prevention and care'. eCAN aims to bring the benefits of eHealth to all citizens and patients across EU-Member States (MS) focusing on cancer prevention and care. There is a need to harmonize telemedicine regulations and to explore the efficacy of teleconsultation programs and telemonitoring in the cancer field.

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The country factsheet includes chapters on:

- 1 definition
- 2 governance
- 3 strategies/policies
- **4** legislation
- 5 cancer specific eHealth solutions

#### Any questions? - Please get in touch via <u>ecan@goeg.at</u>.





# POLICY MAPPING ON EHEALTH POLICIES AND INITIATIVES (INCLUDING ON CANCER CARE) IN **SWITZERLAND**

### **1 DEFINITIONS**

Table 1 : Deviations in the use of international definitions for eHealth terms - Switzerland

Term	Definition	Deviation		
eHealth	The WHO defines eHealth as « the use of information and communication technologies (ICT) for health ». It also says that « eHealth is the transfer of health resources and healthcare by electronic means. » <sup>1</sup>	Yes, in Switzerland eHealth is defined as <i>'covering all electronic health services. Electronic</i> <i>means are used to improve processes in the</i> <i>health care system and to network those</i> <i>involved.</i> <sup>'2</sup> Or in the eHealth strategy: <i>'eHealth is</i> <i>the integrated use of information and</i> <i>communication technology to design, support and</i> <i>network all processes and actors in the health</i> <i>system.</i> <sup>'3</sup>		
mHealth	« Mobile health (mHealth) is defined by the World Health Organization's (WHO) Global Observatory for eHealth as « medical and public health practice supported by mobile devices, such as mobile phones, patient monitoring devices, personal digital assistants (PDAs), and other wireless devices ». <sup>4</sup>	No, Switzerland defines mHealth similarly stating that ' <i>the term Mobile Health (mHealth) describes</i> <i>medical procedures as well as private and public</i> <i>health care measures that are and public health</i> <i>care that are supported by mobile devices such</i> <i>as mobile phones, devices such as mobile phones,</i> <i>patient monitoring devices, personal digital and</i> <i>other wirelessly connected devices.</i> ' <sup>5</sup>		
dHealth	The EU defines digital health (dHealth) and care as referring to « tools and services that use information and communication technologies (ICTs) to improve prevention, diagnosis, treatment, monitoring and management of health-related issues and to monitor and manage lifestyle- habits that impact health ». <sup>6</sup> The WHO defines digital health as « the field of knowledge and practice associated with the development and use of digital technologies to improve health. Digital health expands the concept of eHealth to include digital consumers, with a wider range of smart-devices and connected equipment. It also encompasses other uses of	Not defined in Swiss official documents. The concept of dHealth is not widespread in Switzerland and term seldomly used. Rather, the term eHealth is used (as defined by WHO). Moreover, specific terms such as clinical apps, lifestyle apps are used.		

<sup>&</sup>lt;sup>1</sup> <u>6. eHealth, Factsheet for European Parliament (who.int)</u>

<sup>&</sup>lt;sup>2</sup> eHealth Suisse (e-health-suisse.ch)

<sup>&</sup>lt;sup>3</sup> Strategie eHealth Schweiz 2.0. 2018–2024. (e-health-suisse.ch)

<sup>&</sup>lt;sup>4</sup> World Health Organization *Frequently asked questions on Global Task Force on digital health for TB and its work.* [2017-02-27]. <u>http://www.who.int/tb/areas-of-work/digital-health/faq/en/</u>webcite. In mHealth Assessment: Conceptualization of a Global Framework - PMC (nih.gov)

<sup>&</sup>lt;sup>5</sup> Strategie eHealth Schweiz 2.0. 2018–2024. (e-health-suisse.ch)

<sup>&</sup>lt;sup>6</sup> Events - Smart4Health

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Term	Definition	Deviation
	digital technologies for health such as the Internet of things, artificial intelligence, big data, and robotics. » <sup>7</sup>	
telehealth	The WHO defines telehealth broader than telemedicine « as it includes computer-assisted telecommunications to support management, surveillance, literature, and access to medical knowledge. » <sup>8</sup>	Not defined in Swiss official documents. Term rather seldomly used in Switzerland.
telemedicine	The EU Commission defines telemedicine as follows (EU Commission definition, COM(2008)689) : « Telemedicine is the provision of health care services, through the use of ICT, in situations where the health professional and the patient (or two health professionals) are not in the same location. It involves the secure transmission of medical data and information, through text, sound, images, or other forms needed for the prevention, diagnosis, treatment, and follow- up of patients. » <sup>9</sup>	Similar definition used by eHealth Suisse. <sup>10</sup>
teleconsultation	PAHO describes teleconsultation (also sometimes referred to as remote consultation or telehealth), as « interactions that happen between a clinician and a patient for the purpose of providing diagnostic or therapeutic advice through electronic means. » <sup>11</sup>	Similar definition used by eHealth Suisse. <sup>12</sup>
health app	Essén et al. 2022 define health apps as « a computer program or software application (designed to run on a mobile device) "intended to be used specifically for managing, maintaining, or improving the health of individual persons, or the delivery of care" (ISO <u>https://www.iso.org/standard/78182.html</u> (2021), p 5). »	According to the Federal Office of Public Health, an app ' <i>is a medical device as soon as it can</i> <i>detect or treat diseases, i.e., if it has a medical</i> <i>purpose for an individual and it does more than</i> <i>store, archive or communicate data. Accordingly,</i> <i>apps that measure fitness data or apps used for</i> <i>statistical analysis of clinical or epidemiological</i> <i>data are not medical devices. Similarly, electronic</i> <i>patient registries and information platforms are</i> <i>not medical devices.</i> ' <sup>13</sup>

<sup>&</sup>lt;sup>7</sup> <u>Digital health EURO (who.int)</u>

<sup>&</sup>lt;sup>8</sup> Telehealth – DigitalHealthEurope

<sup>&</sup>lt;sup>9</sup> <u>Telemedicine – DigitalHealthEurope</u>

<sup>&</sup>lt;sup>10</sup> <u>https://www.e-health-suisse.ch/header/glossar.html#T</u>

<sup>&</sup>lt;sup>11</sup> https://www3.paho.org/ish/images/docs/covid-19-teleconsultations-en.pdf?ua=1

<sup>&</sup>lt;sup>12</sup> https://www.e-health-suisse.ch/header/glossar.html#T

<sup>&</sup>lt;sup>13</sup> <u>Digital health apps and telemedicine in Switzerland| CMS Expert Guides</u>



## **2 GOVERNANCE**

Table 2 : Overview on eHealth governance - Switzerland

Question	Answer	Comments/Experience
Is there a Ministry or State Secretariat explicitly in charge of eHealth/dHealth? If so, which Ministry ?	Yes	The Federal Office of Public Health (FOPH) within the Federal Department for Home Affairs is responsible for eHealth matters in Switzerland in close collaboration with the cantons which are responsible for the healthcare supply. <sup>14</sup>
Does the Ministry who oversees health care also have a specific Department or Unit in charge of eHealth/dHealth	Yes	<ul> <li>'The Digital Transformation and Steering Directorate drives digitisation in the healthcare sector. With a view to future challenges, the directorate additionally promotes agile and interdisciplinary cooperation within the FOPH and the health sector. '<sup>15</sup> The Directorate consists of two departments: <ul> <li>'The Digital Transformation Division assesses the opportunities and risks associated with digitisation in the healthcare sector and in the FOPH and serves in a steering and advisory capacity both internally and externally. It is developing a digitization strategy with the involvement of all the stakeholders in the healthcare sector.'<sup>16</sup></li> <li>'The Steering Division promotes and coordinates agile, interdisciplinary cooperation within and outside the FOPH.'</li> </ul> </li> <li>One basic input for these activities is the Swiss eHealth Strategy 2.0<sup>17</sup> lasting from 2018 to 2024.</li> </ul>
Is there a national eHealth governance board?	No	There is no eHealth governance board as such, but the Digital Transformation Division coordinates the development of strategic documents involving all stakeholders in the healthcare sector (see above).
Is there a public eHealth agency such as ELGA GmbH in Austria or ANS in France? At which level (national, regional)? Which functions does this agency cover?	Yes	eHealth Suisse acts a public eHealth agency in Switzerland. It implements the eHealth Switzerland strategy. It has two main roles: To accompany the ongoing implementation of the national EPR and to serve as a national digitisation competence centre. In 2007, the Federal Department of Home Affairs and the Conference of Cantonal Ministers of Health concluded a framework agreement and are responsible for the eHealth Switzerland competence and coordination office. <i>'Their aim is to define common organisational, legal, and technical guidelines for the development of eHealth applications, especially the electronic patient dossier. [] Since the original framework agreement expired in 2015 [], the tasks of eHealth Suisse changed, so that a new agreement was reached in spring 2017 [].'<sup>18</sup></i>

<sup>&</sup>lt;sup>14</sup> <u>Federal Office of Public Health FOPH (admin.ch)</u>

<sup>&</sup>lt;sup>15</sup> <u>Digital Transformation and Steering (admin.ch)</u>

<sup>&</sup>lt;sup>16</sup> <u>Digital Transformation Division (admin.ch)</u>

<sup>&</sup>lt;sup>17</sup> https://www.e-health-suisse.ch/fileadmin/user\_upload/Dokumente/2018/D/181214\_Strategie-eHealth-Suisse-2.0\_d.pdf

<sup>&</sup>lt;sup>18</sup> Trägerschaft - eHealth Suisse (e-health-suisse.ch) and Rahmenvereinbarung eHealth EDI - GDK 2017

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Question	Answer	Comments/Experience		
Are dHealth / eHealth tools in the outpatient sector publicly paid or covered in your benefits package (e.g. by sickness fund or national health service). If yes, please describe how.	Yes, infra- structure and (some) services	Infrastructure such as the electronic patient dossier are free of charge for the population. eHealth services including mainly teleconsultation between doctor and patient are considered reimbursable: 'In Switzerland, the "principle of trust" applies to the reimbursement of digital health tools in the context of a medical service, provided by health care professionals (HCPs). This means that in the case of medical services, it is generally assumed that HCPs use services that meet the legal requirements of effectiveness, expediency, and economic efficiency, and in principle, are reimbursed. Therefore, HCPs can treat patients innovatively in accordance with the latest state-of-the-art DHT, without prior health economic		
Are dHealth / eHealth tools in the inpatient sector automatically covered in your benefits package or do you need to pay extra (e.g. for telehealth consultations or telereha) compared to standard treatments?	Yes, infrastruc ture and (some) services	evaluation by the Federal Office of Public Health (FOPH) – provided that DHTs an CE-marked as medical devices and are effective, expedient, and economical by th service provider. Furthermore, groups of medical devices are reimbursed by th compulsory health insurance if listed in the "Mittel- und Gegenständelist (MiGel)" or "Analyseliste (AL)" where the maximum reimbursement is set." <sup>19</sup>		
Are there any comprehensive cancer centres focussing on eHealth or telehealth treatments? If yes, which ones and for which specific fields?	Yes	<ul> <li>There are several CCCs in Switzerland touching on eHealth (services):</li> <li>Comprehensive Cancer Center Zurich (CCCZ) (personalized oncology) provides for a second opinion online platform for fast access to interdisciplinary expertise of CCCZ.<sup>20</sup></li> <li>The Swiss Cancer Center Léman (SCCL) brings together cancer researchers from western Switzerland's scientific and medical institutions.<sup>21</sup> They organise a weekly molecular tumour board (MTB) meeting by video-conference.<sup>22</sup></li> </ul>		

### **3 STRATEGIES/POLICIES**

Table 3 : Overview on strategies and policies for eHealth and cancer care - Switzerland

Question	Answer	Comments/Experience
Is there a national eHealth strategy?	Yes	The 'Strategy eHealth Switzerland 2.0' <sup>23</sup> (Strategie eHealth Schweiz 2.0) is the national eHealth strategy. The strategy replaced a former strategy of 2007 in 2018 and was prolonged at the end of 2022 until the year 2024. The Federal Government's 'Digital Switzerland' Strategy of September 2018 forms the umbrella for the 'eHealth Switzerland 2.0 Strategy'. <sup>24</sup> Moreover the overarching national strategy 'Gesundheit 2030' <sup>25</sup> mentions digitisation as an important instrument.

<sup>&</sup>lt;sup>19</sup> Reimbursement Pathways for Digital Health Tools and Software - How to Bring Your FemTech Solution to Women | 洞察 | 盛德 (sidley.com)

<sup>&</sup>lt;sup>20</sup> <u>Comprehensive Cancer Center Zurich – USZ</u>

<sup>&</sup>lt;sup>21</sup> SWISS CANCER CENTER Léman – SCCL

<sup>&</sup>lt;sup>22</sup> <u>Clinical innovation – SWISS CANCER CENTER Léman (sccl.ch)</u>

<sup>&</sup>lt;sup>23</sup> https://www.e-health-suisse.ch/fileadmin/user\_upload/Dokumente/2018/D/181214\_Strategie-eHealth-Suisse-2.0\_d.pdf

<sup>&</sup>lt;sup>24</sup> Strategie eHealth Schweiz - eHealth Suisse (e-health-suisse.ch)

<sup>&</sup>lt;sup>25</sup> https://www.bag.admin.ch/dam/bag/de/dokumente/nat-gesundheitsstrategien/gesundheit-2030/strategie-gesundheit2030.pdf.download.pdf/strategie-gesundheit-2030.pdf

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Question	Answer	Comments/Experience
If yes, which stakeholder groups	Various	The federal government together with regions (Kantone) developed the strategy
have been included in drafting the		including all relevant stakeholders in the process. The strategy underwent
national eHealth strategy?		approval by the government. <sup>26</sup>
Are there regional eHealth strategies? If so, can you indicate whether in all regions or only some? Can you provide some documents ?	No	The national eHealth strategy was drafted with regional representatives, primarily the cantons. Partly they have own cantonal / regional eHealth strategies.
If yes, which stakeholder groups have been included in drafting such regional strategy/ies?	Various	Generally stakeholders are broadly involved within such processes.
Are there strategy/ies explicitly referring to / including eHealth cancer care?	Yes	The 'Strategy eHealth Switzerland 2.0' explicitly refers to eHealth, e.g. in K4.1.3 on Promotion of Mobile Health (mHealth). <sup>27</sup>
If not, are there discussions ongoing to develop a national eHealth strategy?	No	The follow-up activities for the present national strategy expiring in 2024 will be established within the upcoming DigiSanté program <sup>28</sup> . Responsible for this is the abovementioned Digital Transformation Division of the FOPH. The DigiSanté program is based on the first goal of the strategy 'Gesundheit 2030'.
Is there a National Cancer Plan? And	No,	The National Cancer Plan of Switzerland expired in 2020 (014-2020). <sup>29</sup> There is
does it refer to eHealth?	outdated	debate about the necessity to provide for a new National Cancer Plan in the
In the light of the EU "Beating Cancer Plan" – are there any recent plans to update or modify existing plans? If yes, what is the timeline?	Yes	Parliament. <sup>30</sup>
Are there any indicators in eHealth policy or national programmes on cancer care measuring the progress of the use of eHealth in cancer care?	Yes	The implementation of the 'Strategy eHealth Switzerland 2.0' itself (and thus also its aims related to eHealth) is monitored by eHealth Suisse in annual reports and by a steering committee. <sup>31</sup> For being the basis for a systematic cancer monitoring the national EPR system is not ripe enough yet. Moreover the present EPR law doesn't allow the secondary use of the EPR data.
Are there any other cancer care specific eHealth initiatives, such as by other stakeholders than policy makers / public authorities?	Yes	The Swiss cancer community holds regular meetings/workshops to discuss pressing issues in cancer care. Collection, transfer, and linkage of structured digital patient data are among the most intensely discussed topics and plans are being developed. These meetings/plans are organised and promoted by Oncosuisse, the association of Swiss cancer organisations.

<sup>&</sup>lt;sup>26</sup> Strategie eHealth Schweiz - eHealth Suisse (e-health-suisse.ch)

<sup>&</sup>lt;sup>27</sup> <u>Strategie eHealth Schweiz 2.0. 2018–2024. (e-health-suisse.ch)</u>

<sup>&</sup>lt;sup>28</sup> DigiSanté program

<sup>&</sup>lt;sup>29</sup> Nationale Strategie gegen Krebs 2014–2020 (admin.ch)

<sup>&</sup>lt;sup>30</sup> 23.3195 | Die Schweiz braucht einen nationalen Krebs- und Kontrollplan - Gleiche Versorgungs- und Überlebenschancen für alle Krebspatient\*innen in der Schweiz: Mehr Koordination lohnt sich | Geschäft | Das Schweizer Parlament

<sup>&</sup>lt;sup>31</sup> <u>Strategie eHealth Schweiz 2.0. 2018–2024. (e-health-suisse.ch)</u>



# **4 LEGISLATION**

Table 4 : Overview on eHealth and cancer legislation - Switzerland

Question	Answer	Comments/Experience			
How would you evaluate the current	The national Electronic Patient Record is regulated by the Federal Act on the Electronic Patient				
state of legislation of eHealth in	Record (EPRA) approved by the parliament in 2017. Regarding other eHealth innovation the				
your country in general?	known law applies with regards to data protection and security (Federal Act on Data Protection,				
	FADP). It may be the above mentioned DigiSanté program will make new law necessary in the				
	mid and long term to make a reasonable national digitisation in the healthcare sector possible.				
ls there legislation on how to use	No <sup>32</sup> There is no legislation on the use of telemedicine in Switzerland. There is only				
telemedicine in general?		general legislation on eHealth related issues, e.g. <sup>33</sup>			
		• framework conditions for the introduction of the electronic patient			
		dossier (Federal Act on the Electronic Patient Dossier (EPDG), 2017),			
		• the Federal Act on Electronic Identification Services (E-ID Act, 2021).			
Is there legislation explicitly	Yes	Attempts to establish a prevention act in Switzerland have failed in parliament in			
referring to cancer prevention?		2012. The legislation in cancer prevention (as well as early detection, treatment,			
		and aftercare) on a national level is only partially established. The Cancer			
		Registration Act (KRG; SR 818.33) has been in force since 1 January 2020. It			
		prescribes the uniform and complete registration of cancer cases in Switzerland. <sup>34</sup>			
ls there legislation explicitly	No	No further information available.			
referring to / including eHealth					
cancer care?					
If yes, which of these legislation(s)	N/A	No further information available.			
do you consider most important in					
the context of eHealth and cancer					
care? And why?					
If no, are there any reasons or	N/A	No further information available.			
barriers to the fact that there is no					
or only limited cancer specific					
eHealth legislation (i.e., discussions					
still ongoing, conflicting opinions or					
other).	Fatable 1				
What could be improved or would	Establishment of a cancer plan and/or a prevention/health act is vital for a coordinated and				
need to be done to improve these	efficient cancer care in Switzerland.				
legislation for eHealth in cancer					
care in your country?					

 <sup>&</sup>lt;sup>32</sup> Telemedicine & Law | Recommendations and Best practices for doctors (datalex.ch)
 <sup>33</sup> Strategie eHealth Schweiz 2.0. 2018–2024. (e-health-suisse.ch)

<sup>&</sup>lt;sup>34</sup> Krebsregistrierung, Tumorregister, Krebszentrum, Fachstelle | NKRS

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#### **5 CANCER SPECIFIC eHEALTH SOLUTIONS**

Table 5 : Overview on cancer specific eHealth solutions in use – Switzerland

Area of application/ type of solutions	Login Websites	Apps	Webinars	Multi-disciplinary teleconferences (HCP-HPC)	Teleconsultation (HCP-patient)	Telemonitoring via devices	Other, please specify
Ecosystem	Yes, login website to access the electronic patient dossier (EPD) <sup>35</sup>	Yes, EPD available as app; SwissCovid app; self-anamnesis application (anamnesis@home app) and eMedication plan (eMMA) connected to EPD system <sup>36</sup>	Yes, various webinars around health available, for details on cancer webinars see below	Yes, tumour boards are performed in several hospitals or between experts from different hospitals (see also below for specific tumour boards)	Yes, possible with same regulation as in person meetings <sup>37</sup> (doctors perform the teleconsultation) such as provided e.g. in CHUV <sup>38</sup>	-	Yes, e.g., Santé24 hotline (telemedicinal counselling) by SWICA health insurance <sup>39</sup> ; Swiss eHealth barometer <sup>40</sup> ; Swiss eHealth Forum <sup>41</sup>
Prevention of Cancer	-	-	Yes, e.g., by the tumour center Bern on early detection of cancer <sup>42</sup>	-	-	-	-
Treatment of Cancer	No, but a literature database for HCP in	-	Yes, e.g., for cancer care givers by the	Yes, e.g., weekly molecular tumour board (MTB) meetings by video-conference	-	-	-

<sup>35</sup> patientendossier.ch

<sup>36</sup> SHTI247-0251.pdf (bfh.ch)

<sup>37</sup> <u>Téléconsultation en pratique (revmed.ch)</u>

<sup>38</sup> <u>Téléconsultation - CHUV</u>

<sup>39</sup> santé24 – Medizinische Beratung rund um die Uhr – SWICA

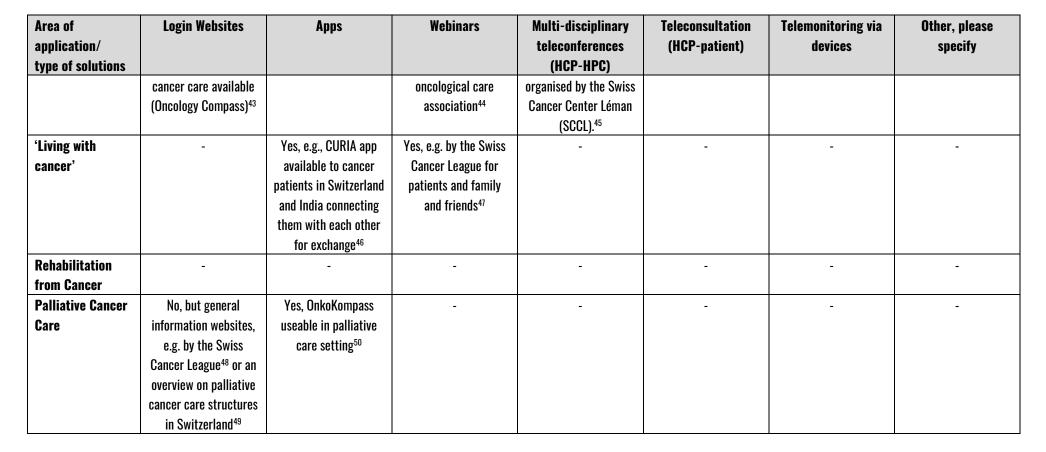
<sup>40</sup> Swiss eHealth Barometer 2022 | gfs.bern (gfsbern.ch)

<sup>41</sup> Swiss eHealth Forum (e-healthforum.ch)

<sup>42</sup> <u>Krebs frühzeitig erkennen - UCI – Das Tumorzentrum Bern (insel.ch)</u>

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<sup>&</sup>lt;sup>43</sup> Oncology Compass | Congress updates and practice changing publications for Oncologist

<sup>&</sup>lt;sup>44</sup> Onkologiepflege Schweiz - Startseite

<sup>&</sup>lt;sup>45</sup> Clinical innovation – SWISS CANCER CENTER Léman (sccl.ch)

<sup>&</sup>lt;sup>46</sup> Cancer patients in India and Switzerland can now join the community of 70,000 empowered patients through the CURIA app - Curia | Giving the power of information to the patient

<sup>&</sup>lt;sup>47</sup> Kurse & Seminare (krebsliga.ch)

<sup>&</sup>lt;sup>48</sup> Wie Palliative Care bei Krebserkrankungen helfen kann | Krebsliga

<sup>&</sup>lt;sup>49</sup> Übersicht Palliative Care Schweiz | palliativkarte.ch

<sup>&</sup>lt;sup>50</sup> Reach and efficacy of the eHealth application Oncokompas, facilitating partners of incurably ill cancer patients to self-manage their caregiver needs: a randomized controlled trial | SpringerLink



#### Table 6 : Number of eHealth solutions available and in use – Switzerland

Question	Answer	Comments/Experience
How many eHealth solutions (in the sense of	~300,000	There are around 300,000 health apps available in Switzerland. eHealth
medical devices and thus 'authority		Suisse has worked on criteria to assess their quality. <sup>51</sup>
approved/certified') solutions are existing		'The classification as a medical device is based on the Swiss Therapeutic
currently in your country in the context of cancer		Products Act and the Swiss Medical Devices Ordinance. Pure software
care/treatment?		such as an app or an algorithm could qualify as a medical device.'52
Is there a website or other information on	No	No further information available.
solutions that are recommended to the public for		
use (e.g. a selection of health apps that are		
recommended to cancer patients or in general)?		
Can you give an estimation on how the split	N/A	No further information available.
between private and public apps are available?		
Give an estimate percentage of public solutions.		
How can providers and patients assess if the apps	Yes	eHealth Suisse has set up quality criteria for mobile health applications. <sup>53</sup>
are reliable? Is there a certification or quality		It also provides a factsheet on 'What is a good mHealth app?. <sup>54</sup> Further
approval procedure in place? If yes, which kind of		guidelines for both developers and users are available on the eHealth
procedure?		Suisse website. <sup>55</sup> It is planned to bundle self-declarations of the app
		providers based on these criteria in a central online database accessible
		to all stakeholders and the public via a web platform. <sup>56</sup>
How many Health Care Providers use such	N/A	No further information available.
solutions? Which sector uses rather which types		
of solutions?		

<sup>&</sup>lt;sup>51</sup> <u>mHealth - eHealth Suisse (e-health-suisse.ch)</u>

<sup>&</sup>lt;sup>52</sup> <u>Digital health apps and telemedicine in Switzerland| CMS Expert Guides</u>

<sup>&</sup>lt;sup>53</sup> https://www.e-health-suisse.ch/fileadmin/user\_upload/Dokumente/D/kriterienkatalog-selbstdeklaration-gesundheits-apps.pdf

<sup>&</sup>lt;sup>54</sup> <u>https://www.e-health-suisse.ch/fileadmin/user\_upload/Dokumente/D/factsheet-kriterienkatalog-gesundheitsapps.pdf</u>

<sup>&</sup>lt;sup>55</sup> <u>mHealth - eHealth Suisse (e-health-suisse.ch)</u>

<sup>&</sup>lt;sup>56</sup> <u>factsheet-kriterienkatalog-gesundheitsapps.pdf (e-health-suisse.ch)</u>