

- Suggestions for Consultation Paper on Health Facility Registry(HFR)

1. For clause 2.1 one good example of digital registration and working is Gujarat State Council For Physiotherapist (GSCPT) ,which is regulatory body for physiotherapist in Gujarat even member register is online. ([GSCPT](#))
2. For clause 2.3.1 ,among various international models we suggest to follow U.K model of central data, paperless prescription and e-referral. If its difficult to do at national level maintain at state level.
3. In clause 3.2 in data schema add patient feedback/experience as new category. There should be cross verification weather patient has received from healthcare premise. It will work not only as client service provider feedback but also as guidance for future patients seeking same treatment from same premise.
4. In clause 3.2.1 Minimum HFR data in appendix 1 for physiotherapy first option is Physical Medicine & Rehabilitation (PMR)/ Physiotherapy, suggestion is to keep physiotherapy only as both are different and keeping both in option is irrelevant
5. In clause 3.2.1 Minimum HFR data in appendix 1 for physiotherapy we suggest to add few more points
Chest Physiotherapy
Gait Training
Fitness Training
Rehabilitation
Geriatric Physiotherapy
Paediatric Physiotherapy
6. In appendix 1 type of facility there is option of Physiotherapy Clinic, We suggest to replace the term with Physiotherapy & Rehabilitation Clinic. As all Physiotherapy clinics train for Rehabilitation and its most commonly uses terminology used by physiotherapy clinics.
7. In appendix 2 we suggest you to add Physiotherapy Clinic & Hospital option in Type of Establishment like for dentistry, as per in other area dentistry and physiotherapy both are mentioned separately in the paper.
8. In clause 3.2.2 under 1) Licensing authority we suggest to add various healthcare regulatory bodies of central government and state like in Gujarat for physiotherapist manpower Gujarat State Council For Physiotherapist.
9. For clause 3.3.3 and 3.3.7 we suggest to alternative 1 for HFR verifier. We suggest to give priority to boards/commissions/councils as verifiers who already

registering and maintaining standards of HealthCare professional Gujarat State Council For Physiotherapy may work as verifier for Physiotherapy clinics and hospitals.

10. Similarly for 3.4.4 for HFR organization various Health-care professional regulatory bodies or registered associations may help to implement govt schemes. E.g Physiotherapy councils and organization may help to implement disable welfare schemes.