

Divergent reimbursement practices for digital health until August 2023: a policy mapping of eight European countries and Israel

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Abstract

Background: The adoption of digital healthcare within health systems is determined by various factors, including pricing and reimbursement. The reimbursement landscape for digital health in Europe remains under-researched. While various emergency reimbursement decisions were made during the COVID-19 pandemic to allow the use of healthcare delivery through videoconferencing and asynchronous care (e.g., digital applications), research so far has primarily focused on the policy innovations that facilitated this outside of Europe.

Objective: This article examines the digital health reimbursement practices in eight European countries (Belgium, France, Germany, Italy, the Netherlands, Poland, Sweden, and the United Kingdom) and Israel.

Methods: A policy mapping analysis was performed using a scoping review as foundational methodology. We reviewed the literature in MEDLINE, Embase, Global Health, and Web of Science. Supplementary records were identified through Google Scholar and country experts.

Results: Our search strategy yielded a total of 1559 records, of which 40 were ultimately included in this article. As of August 2023, digital health solutions are reimbursable to some extent in all studied countries except Poland, though the mechanism of reimbursement differs significantly across countries. At the time of writing, pricing of digital health solutions are mostly determined through discussions between national or regional committees and the manufacturers of digital health solutions in absence of value-based assessment mechanisms. Financing digital health solutions outside traditional reimbursement schemes was possible in all studied countries except Poland and typically occurs via health innovation or digital health-specific funding schemes. European countries show value-based pricing frameworks that range from non-existent to embryonic.

Conclusions: Studied countries show divergent approaches to the reimbursement of digital health solutions. These differences may complicate the ability of patients to seek cross-country healthcare in another country, even if a digital health application is available in both countries. Further, the fragmented environment will present challenges for developers of such solutions, as they look to expand their impact across countries and health systems. An increased emphasis on developing a clear conceptualisation of digital health, as well as value-based pricing and reimbursement mechanisms, are needed for the sustainable integration of digital health. This paper can therein serve as a basis for further, more detailed research as the field of digital health reimbursement evolves.

Introduction

Background

The COVID-19 pandemic has significantly accelerated the digital transformation of the healthcare sector, providing an opportunity to leverage software to prevent, manage, or treat disease [1–6]. Digital health solutions encompass a broad range of technologies that promote, improve, or support health system functioning and the delivery of healthcare, including electronic health records, telemedicine, mobile health apps, health data analytics, and digital therapeutics [7,8]. These solutions can be used for a range of functions, including online consultations with medical professionals, tools and software for remote patient monitoring, real-time updates of algorithms based on patient data, and the delivery of healthcare interventions. Recent studies have indicated that combining medication with digital health solutions can lead to improved outcomes for a variety of chronic conditions, such as type 2 diabetes, cardiovascular diseases, and psychiatric and mental health conditions [9,10].

The adoption of digital health solutions within health systems is subject to various factors, including pricing and reimbursement [8,9,11–13]. Pricing models in health comprise mechanisms such as cost-based pricing (i.e., the price of a product is based on the cost of care provided to patients and allowable covered costs), the use of cost-effectiveness thresholds (i.e., the price per quality-adjusted life year is compared to a pre-set threshold), external price referencing (i.e., the price of a product is based on the prices set in other countries), and value-based pricing (i.e., the price is based on the value that an intervention adds to the healthcare process, such as improved health outcomes or reduced costs) [14,15]. The latter approach is recognized as a promising solution to optimize resource allocation and address numerous challenges faced by health systems [11]. National price regulations that incorporate value-based elements, such as Germany's, have also been shown to more closely align prices paid for medical products with their benefit to patients [16]. Value-based pricing also supports evidence-based decision-making in healthcare procurement by providing a benchmark for what constitutes a high-quality intervention [17]. However, applying a value-based framework to digital healthcare requires the use of comprehensive frameworks to determine the value of digital interventions and can be challenging due to the continuous improvement of digital health applications through performance data and patient feedback [11,12]. Finally, there is a dearth of data and assessment frameworks in use to evaluate the cost-effectiveness of digital healthcare [18,19], as well as a scarcity of established pricing models that can be used to streamline the introduction of digital health applications to the healthcare market [20].

Having robust reimbursement mechanisms in place is a vital factor in ensuring the access and affordability of new health technologies [15], though the reimbursement landscape for digital health in Europe remains under-researched and poorly characterized. While various emergency reimbursement decisions were made during the COVID-19 pandemic to allow the

use of healthcare delivery through videoconferencing and asynchronous care [21,22], such tools represent only a small set of digital health approaches and research so far has primarily focused on the policy innovations that facilitated this outside of Europe. As an example, studies have focussed on the Australian Government's recent expansion of Medicare-subsidized telehealth services to facilitate the remote delivery of care and mitigate the risk of virus transmission. Consequently, telehealth services became eligible for reimbursement through the Australian Medicare system, and eventually became subject to co-payments as well [22,23]. In the United States, research has highlighted the rapid modification of coverage and payment parity policies by states in response to the COVID-19 pandemic to promote the adoption of telehealth and minimize physical contact, thereby overcoming a significant utilization barrier [21,24]. By comparison, developments in Europe, particularly in terms of the eligibility of digital health applications (i.e., software designed to provide a specific form of therapy with or without the involvement of a healthcare professional) for reimbursement, remain largely unexplored (a notable exception being Germany, which created the first combined regulation and reimbursement pathway for digital health applications in 2019, which has been described in the literature) [25].

Objective

This article collects information on the reimbursement practices for digital health in nine countries within the WHO/Europe region: Belgium, France, Germany, Israel, Italy, the Netherlands, Poland, Sweden, and the United Kingdom. These countries were chosen based on the availability of information on the reimbursement of digital health and feedback received from the Data and Digital Health Unit at WHO/Europe [11,26–29]. We aim to map and compare four distinct reimbursement characteristics across the studied countries: (1) whether digital health solutions are recognized as a reimbursable form of healthcare; (2) what mechanisms are used to reimburse digital health solutions; (3) how digital health solutions are priced and whether value-based healthcare frameworks are embedded in that process; and (4) whether any funding is available to reimburse digital health solutions outside of (public or private) insurance policies.

Methods

Policy mapping framework

The study uses a policy mapping framework, which has been used and validated by previous research in the fields of autism, disability, and substance abuse policy [30–35]. It is well suited for the scope of this research based on the implementation and development of health policy. The policy mapping framework is based on the foundation of a scoping review, which allows for the rapid mapping of the key concepts underpinning a broad research area that is particularly valuable for complex issues which have not been reviewed comprehensively to date [36,37]. The established framework is suited to analysing the development of health and social policy over time and across multiple layers of governance. In the context of this study, we only seek to collect information on current digital health

reimbursement practices; as such, the longitudinal aspect of the policy mapping framework is not applied. We further develop this policy mapping framework from a cross-country analysis lens by presenting both individual country information in tabulated form and cross-country differences narratively. This approach is also supported by previous policy mapping exercises [38–40].

Data collection and analysis

In line with the Joanna Briggs Institute Manual for Evidence Synthesis for Scoping Reviews [41], we searched the scientific databases Medline (Ovid), Embase (Ovid), Global Health (Ovid), and Web of Science on 20 January 2023 and conducted a follow-up search on 18 August 2023 for articles addressing the reimbursement and financing of digital health applications in Belgium, France, Germany, Israel, Italy, the Netherlands, Poland, Sweden, and the United Kingdom. These databases were chosen to cover both health-specific and interdisciplinary academic fields. To identify grey literature, Google Scholar (first 300 hits [42]) was used. To be eligible for inclusion, an article had to capture (a part of) the reimbursement or financing pathway of digital health applications in the studied countries. Only studies from 2018 onwards were eligible for inclusion as this timeframe captures the developments before and during the COVID-19 pandemic in terms of digital health reimbursement and financing as well the launch of the first country-level reimbursement policy for digital health applications in Germany in late 2019 [25]. The policy mapping framework, in contrast to a traditional scoping review, takes a broader approach to the types of evidence that are eligible for inclusion. Specifically, after searching exclusively for original research and literature reviews, we identified only 14 articles eligible for inclusion, which was too scarce to provide information on existing digital health reimbursement pathways in the studied countries. As such, we expanded the eligibility criteria to include editorials, commentaries, viewpoints, and gray literature as these documents may provide important details of policy developments before these are more rigorously captured in empirical research. Simultaneously, we did not directly search policy repositories as is common practice in the policy mapping framework seeing as we aim to map reimbursement processes rather than the legal basis for reimbursement. Given our specific interest in policy developments in the WHO/Europe Region, articles without a focus on the countries listed above were excluded.

Table 1 shows the build-up of the search strings for the academic database searches, as well as the number of hits per query. The search string was reviewed and validated by an information specialist at the LSE Library. The search terms for the supplementary searches in Google Scholar consisted of the phrases "reimbursement of digital health", "reimbursement of digital therapeutics", "financing of digital health", "financing of digital therapeutics", "digital health tariff", "digital health pricing", "telehealth pricing", "telehealth tariff", and "financing of telehealth" combined with the respective country. This combination of keywords ensured that less complex forms of digital health solutions (e.g., telehealth,

telemedicine) and more complex forms (e.g., digital health applications or digital therapeutics) were covered in the search string. In case the dominant language was another language than English, Google Translate was used to translate the search phrases into the desired language [43]. To minimise potential bias introduced through machine translations, experts from the studied countries were asked to assist in searching and interpreting the digital health reimbursement landscape for their respective countries. Additional articles were also identified through a review of references of the studies included through database searching. Policy contents and mechanisms were identified from selected references and reviewed by means of thematic content analysis. After finalising the data collection and analysis, country experts reviewed the collected information to validate the findings and, where necessary, add additional expertise and insights. Finally, individual country information were tabulated per studied reimbursement characteristic and the disparities between countries were narratively synthesized.

Table 1. Search queries for the respective databases.

| Database | Query | Hits |
|---|--|------|
| Medline (Ovid) Embase (Ovid) Global Health (Ovid) | 1 (digital adj3 (health or medicine or therapeutic? or care)).ti,ab. 2 (ehealth or e-health or mhealth or m-health or telehealth or telemedicine or "health app*" or telecare or "virtual health" OR "mobile app*").ti,ab. 3 exp telemedicine/ 4 1 or 2 or 3 5 Insurance, Health, Reimbursement/ 6 exp "Costs and Cost Analysis"/ 7 (reimburse* OR financ* OR pricing OR price* OR tariff*).ti,ab. 8 5 or 6 or 7 9 Belgium/ OR France/ OR Germany/ OR Israel/ OR Italy/ OR Netherlands/ OR Poland/ OR Sweden/ OR United Kingdom/ 10 (Belgi* OR France OR French OR German* IR Israel* IR Ital* OR Netherlands OR Dutch OR Poland OR Polish OR Sweden OR Swedish OR "United Kingdom" OR Engl* OR Wales OR Welsh OR Scot* OR "Northern Ir*").ti,ab. 11 9 or 10 12 4 and 8 and 11 13 limit 12 to yr="2018 -Current" | 1004 |
| Web of Science | (TS=(digital NEAR/3 (health or medicine or therapeutic? or care)) OR TS=(ehealth or e-health or mhealth or m-health or telehealth or telemedicine or "health app*" or telecare or "virtual health" OR "mobile app*")) AND TS=(reimburse* OR financ* OR pricing OR price* OR tariff*) AND TS=(Belgi* OR France OR French OR German* IR Israel* IR Ital* OR Netherlands OR Dutch OR Poland OR Polish OR Sweden OR Swedish OR "United Kingdom" OR Engl* OR Wales OR Welsh OR Scot* OR "Northern Ir*") | 231 |

Results

Search results

Our search strategy yielded a total of 1536 records (1235 documents through academic database searching and 301 through supplementary searches). Twenty-three records were further identified through the country experts. After deduplication, 1266 documents were screened for eligibility and 40 were ultimately included in the analysis. Most documents were excluded due to them not discussing the current reimbursement or financing pathways in place in the studied countries. We included 9 original research articles [11,20,44–50], 5 reviews [8,18,27,51,52], 4 conference abstracts [53–56], 18 gray literature sources [28,57–73], 3 reports [74–76], and 1 commentary [25]. In terms of country focus, 3 documents focused on Belgium [57–59], 8 on France [11,28,51,54–56,60,61], 6 on Germany [18,27,44,52,54,62], 3 on Israel [45,63,76], 4 on Italy [46–48,64], 5 on the Netherlands [8,20,49,65,75], 5 on Poland [50,66–68,74], 3 on Sweden [69–71], and 6 on the United Kingdom [28,53,54,56,72,73]. Figure 1 shows a PRISMA flowchart of the data collection process. Table 2 shows the country-specific digital health reimbursement details.

Figure 1. PRISMA flowchart of the screening process.

[INSERT Figure 1]

Table 2. Country-specific details on the reimbursement and financing of digital health applications.

| | Reimbursement characteristics | | | |
|----------------|-------------------------------|---|---|---|
| | Eligible for reimbursement | Mechanism of reimbursement | Pricing of digital health | Non-insurance reimbursement |
| Belgium | Yes | Reimbursement of digital health solutions does not focus on reimbursing the solution itself. Rather, the Belgian reimbursement system covers a particular healthcare trajectory holistically and digital health solutions may be deployed by the practitioner as part of the healthcare process [57]. | Once a digital health solution has reached the highest level of the mHealth validation pyramid, the pricing is done within the context of the healthcare process that the application will be integrated into. Each healthcare process requires its own price determination [58]. | The TBM program aims at contributing to the implementation of (new) therapies, diagnostic techniques and preventive methods, which, without government funding, would not make it to the patient due to a lack of industrial interest [59]. |
| France | Yes | <p>Reimbursement of digital health solutions can occur through the centralised pathway of medical devices. Connected medical devices have recently been added to the scope of the French National Authority for Health's directory of products that qualify for reimbursement within the statutory health insurance [28,54,55]. After the pricing process has been completed, the National Union of Health Insurers adds the digital health solution to a directory of reimbursable products and sets a reimbursement rate for the next five years that matches the digital health solution's clinical benefits assessment [11,54].</p> <p>Following the success of the ETAPES experimental program, a reimbursement pathway was introduced in French law under the 2022 Social Security Act (Article 36). This pathway aims to deploy novel remote monitoring applications and requires an evaluation by the French National Authority for Health, much like the existing pathway of medical devices. In case digital health solutions also have therapeutic functions, this pathway can only be applied to the telemonitoring parts of the digital health solution [60].</p> <p>In 2023, the French Ministry of Health and Prevention introduced an early access pathway for the reimbursement of sufficiently developed digital medical devices (i.e., digital health applications) through the PECAN program [61]. The PECAN program allows one year of special coverage by the French health care system, enabling the manufacturer to be reimbursed while they finalize the demonstration of their clinical and/or organisational benefits.</p> | The Economic Committee for Health Products (CEPS) negotiates the pricing of digital health solution within the statutory insurance with the manufacturer [11,51]. Currently, there are no specific value-based pricing guidelines for digital health solution available [51]. | Until December 2022 inclusive, a second reimbursement pathway existed in the form of the experimental program for telemonitoring in France (ETAPES), which focused on the development of telemonitoring approaches in five health specialties: heart failure, kidney failure, respiratory failure, diabetes, and implantable cardiac devices [28,56]. |

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| Germany | Yes | <p>Digital health applications specifically can be reimbursed under the statutory health insurance as long as they are approved by the Federal Institute for Drugs and Medical Devices and listed in the national digital health directory [18,25,44,52,54]. It is prescribed on a fee-for-service basis [18,27,62].</p> | <p>For the first 12 months of being listed in the digital health application directory, the manufacturer is generally able to freely set the sales price and pricing model of their digital health application. After 12 months, the set price is a negotiated price between the manufacturer and the National Association of Statutory Health Insurance Funds [18].</p> <p>Prior to the start of the pricing negotiations, the following details have to be clarified [18]:</p> <ol style="list-style-type: none"> (1) The evidence on general requirements and positive health effects; (2) The results of the studies conducted as part of the possible trial phase; (3) Information on prices for self-payers; (4) Information on prices in other European countries; (5) The complete notification of the Federal Institute for Drugs and Medical Devices about the inclusion of the digital health application in the national directory; and (6) The number of activation/prescription codes redeemed for the digital health application in the period from inclusion in the national directory to five days before submission. | <p>Financial support for the development of digital health applications can be obtained from the German Innovation Fund, funded by the German Health Insurance (<i>Gestzlicher Krankenversicherung</i>) [27].</p> |
| Israel | Yes | <p>Health maintenance organisations are obligated to provide the services described in the National List of Health Services to their insured population [63,76]. The list is updated annually by an appointed Public Committee, with additional budget allocated to these new additions. Since the national list is part of the health insurance law, the technologies not considered as standalone technologies but as entitlement to the medical service provided by these technologies. The health maintenance organizations may choose to utilize digital health solutions to provide an existing entitlement, instead or in parallel to the more traditional methods.</p> <p>Health maintenance organizations can also decide to purchase digital health solutions as part of a service that is not included in the national list. In this case, they fund it through their internal basket or through the complementary insurances [63].</p> | <p>When a new technology is added to the national list, its price is estimated by sub-committee adjacent to the public committee and used for budgeting purposes [45,76]. However, the actual price of the technology is negotiated between each of the health maintenance organizations and the manufacturer [63].</p> | <p>Other funds that are available to reimburse digital health solutions outside insurance policies mostly include Ministry of Health grant programs specifically aimed at supporting the development and implementation of digital health solutions. These funds are used to support the development of new digital health solutions or to help fund the adoption and implementation of existing solutions [63].</p> |

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| Italy | Yes | <p>Digital health solutions can be reimbursed under the national health system [46], though the reimbursement procedures of digital health applications represent an open challenge and is open to multiple approaches [47]. All regions in Italy adopted tariffs for telehealth and matching reimbursement procedures for all modes of service delivery (digitally supported or in-person) [64]. These tariffs should follow a payment parity mechanism, indicating healthcare providers are paid a fixed amount per patient, regardless of the services provided and their mode of provision [64].</p> | <p>Digital health solutions that enhance the current healthcare and therapies process may be merged and embedded into an updated price list of existing services. Pricing protocols for digital health solutions that require a fee-for-subscription attached to a drug or medical device have not yet been established [47].</p> | <p>Pilot projects within the national health system promote the integration of digital health solutions into the delivery of healthcare through public health services [48].</p> |
| Netherlands | Yes | <p>The Dutch Healthcare Authority has published guidance documents to help health professionals in the Netherlands distinguish between clinical medical applications and assistive health applications. This distinction is important in the Dutch healthcare context to determine whether a digital health solution has to be reimbursed under individual health insurance companies (in the case of usage in primary care, home, or community settings) or whether they can be reimbursed by the basic health insurance package under the diagnosis-related groups (in the case of hospital-based specialist care) [65].</p> | <p>Pricing of (digital) health solutions in the Netherlands currently involves a negotiation between the health insurers, health providers, the Dutch Healthcare Authority (<i>Nederlandse Zorgautoriteit [NZA]</i>), and the Dutch Health Institute (<i>Zorginstituut Nederland</i>), though no specific guidelines for the pricing of digital health solutions have been established [49,75].</p> | <p>The Dutch Healthcare Authority offers a financing mechanism for ‘promising types of healthcare’ until 2023 inclusive, which cover treatment options currently not yet covered by the basic health insurance [65].</p> <p>Additionally, some digital health solutions are made available through sponsorships from non-governmental organisations (e.g., Alzheimer Netherlands sponsoring two digital health applications for dementia) [8,20].</p> |

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| Poland | No | A reimbursement pathway within the National Health Fund for digitally delivered health services was created as part of an emergency COVID-19 policy. The scope of digital health in Poland is currently limited to tool of digital consultation between healthcare professionals and patients, consultations between healthcare professionals, as well as the e-Prescription system [50]. This situation is further strengthened by the limitation that reimbursable digital healthcare should be performed by a healthcare professional whose services are already covered under the National Health Fund [66]. | <p>Healthcare services tariffing involves the President of the National Health Fund, the Tariffing Council, and the Minister of Health [74]. The Tariffing Council is responsible for providing an opinion on the determination of the tariff of the service, while the Minister of Health is responsible for approving the tariffing plan. The report on the determination of the tariff of the service includes a description of the health care service subject to tariffing, an analysis of demand and current and desired supply of the health care service subject to tariffing, a description of the manner and level of financing of the health care service subject to tariffing in other countries, an analysis of cost data, a draft tariff of the service, an analysis of the financial effects on the health care system, and other available data necessary to determine the tariff of the service. The Tariffing Council is required to issue an opinion on the determination of the tariff of the service within 30 days of receipt of the report.</p> <p>The Supreme Audit Office notes that the pricing of individual telemedicine services reimbursed by the National Health Fund usually takes much less time than the pricing of other services [67].</p> | While no concrete alternative financing pathways are laid out, the Program for the Development of E-Health in Poland for the Years 2022-2027 indicates that funds can be obtained for this purpose from programs such as the Regional Operational Programme, the Operational Programme Infrastructure and Environment, the National Recovery Plan and the Digital Europe Programme [68]. |
| Sweden | Yes | For the purpose of streamlining the remuneration of digital healthcare, Sweden drafted recommendations in 2019 on what regions or local authorities should be reimbursed for if a citizen from another region seeks digital healthcare within their region [69]. | Each region is responsible for the price-setting of digital healthcare services and the corresponding co-payments for patients. However, patients are not limited to only seek healthcare in their region of residence, resulting in a complicated system with different prices for digital healthcare outside the county and for physical care within the region [70]. | Public funding for early-stage innovations can be acquired through Vinnova, Sweden's innovation agency [71]. |
| United Kingdom | Yes | Once a digital health application receives a positive recommendation from the National Institute of Health and Care Excellence, the application becomes eligible for purchase by the integrated care boards pending negotiations [28,56]. Delivery of digital health applications to patients is free of charge at the point of service [72]. | In their assessment, NICE provides recommendations on a value-based pricing for a digital health application. However, pricing negotiations occur individually with the 42 integrated care boards (the replacement of the clinical commissioning groups) [28,53,54,56]. | In England, the MedTech funding mandate can reimburse the costs of using digital health applications for a duration of up to four years, though a positive assessment of the NICE is required to be eligible for this funding scheme [73]. The NHS Innovation Accelerator aims to fast-track |

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| | | | | digital innovations into the NHS by supporting high-impact, evidence-based interventions and providing bursaries for scaling across the NHS. The Innovation and Technology Tariff has been introduced in 2017 to foster the adoption and centralise funding of six innovations deemed suitable for NHS-scale deployment (one of which is a digital health intervention) [53]. |
|--|--|--|--|---|

Eligibility and mechanism of reimbursement through insurance

All studied countries except Poland allowed for some reimbursement of digital health solutions. However, the reimbursement mechanisms differed substantially across countries, which can be attributed in part to the differences in how the health systems are financed. Two reimbursement archetypes could be derived from the studied countries: countries either reimbursed the digital health solution itself (France, Germany, Italy, Netherlands, Poland, Sweden, and the United Kingdom) or reimbursed the clinical pathway that the digital health solution is part of (Belgium and Israel). Further variety was observed across the studied countries in how digital health applications were classified. Belgium, France, and Israel classify digital health solutions under the traditional paradigm of medical devices, whereas Germany, Italy, the Netherlands, Poland, Sweden, and the United Kingdom recognise digital health solutions as its own classification. Italy was the only studied country that implemented an explicit system of parity for the reimbursement of digital health solutions. This means that health providers are paid a fixed fee regardless of whether healthcare is delivered face-to-face or through digital health.

Pricing of digital health applications

Pricing mechanisms were found to be at different stages of development across countries. France, Germany, Israel, and Poland each have a dedicated committee that decides on the price of digital health applications within their respective national insurance systems, though only Germany reports a concrete framework upon which the prices of digital health applications are based. In contrast, Sweden and the United Kingdom delegate pricing negotiations to the regional level, with each region being responsible for reaching an agreement with the digital health manufacturer. The Netherlands exhibited a combination of both approaches, depending on whether a specific digital health application was included in their mandatory health insurance package or the optional insurer-determined insurance package. In contrast, Belgium and Italy determine the price of digital health applications in the context of the healthcare process in which they are deployed. Italy reported having no concrete pricing framework in place for digital health applications even though they are deployed on a fee-for-service basis. Despite using differentiated approaches, all countries adopted a variation of cost-based pricing for digital health except for Belgium, where it is integrated in a value-based pricing system and Germany, where price negotiations need to be based on the demonstrated value of the digital health solution.

Financing digital health applications outside insurance

The studied countries reported an array of options for financing digital health solutions that were not reliant on their inclusion in health insurance packages. France offered an experimental program for digital health solutions in the fields of heart failure, kidney failure, respiratory failure, diabetes, and implantable cardiac devices until January 2023. Belgium, Germany, Israel, Italy, the Netherlands, Sweden, and the United Kingdom offer innovation grants that finance treatment options currently under development and not yet covered by

the respective national health insurance frameworks, which can cover digital health solutions. In Germany, however, digital health applications that are approved via Germany's Fast-Track process, which combines regulation and reimbursement, have to be directly reimbursed in the statutory health insurance system. Furthermore, certain NGOs in the Netherlands offer access to disease-specific digital health solutions outside of insurance packages. In this scenario, they are purchased by the NGO and distributed to its members free of charge. Poland was the only country that did not report any concrete funding mechanism for digital health solutions.

Discussion

Principal findings

While there is nascent literature on national reimbursement practices vis-a-vis digital health solutions, this study is, to the best of the authors' knowledge, the first to compare reimbursement pathways across countries in the WHO/Europe region with and without specified digital health pathways and to do so for a broader set of digital health tools and approaches. Our findings reveal that the reimbursement pathways for digital health are varied and that value-based pricing frameworks are rare. While this can be partly attributed to the distinct systems for financing healthcare in the examined countries, it also emphasizes how the absence of a consistent definition and classification of digital health can contribute to disparate policy and implementation approaches. The present conceptualization of digital health solutions can encompass a range of meanings, including technology, user experience, individual service, product, or process, and can be viewed as part of the broader ecosystem of health services [2]. While this expansive definition allows for significant flexibility in integrating digital health into existing healthcare delivery and reimbursement frameworks, it can also lead to uncertainty regarding where and how digital health is meant to fit within a health system. For instance, digital health solutions are regarded as standalone healthcare products in France, Germany, Italy, Netherlands, Poland, Sweden, and the United Kingdom, while framed as tools to deliver traditional healthcare in Belgium and Israel. Furthermore, Belgium, France, Germany, Italy, and the United Kingdom have specific policy frameworks in place that outline the concept of digital health applications, while the other countries categorise digital health applications under either the broader digitalisation of healthcare or medical devices [18,28,56,60,65].

Overall, the observed differences may be explained by the novelty and unprecedented nature of digital health tools and approaches, especially in light of how change-resistant the healthcare sector can be [77]. Another contributing factor may be the lack of digital health literacy among both clinicians and patient-users and the necessary (but not sufficient) for adoption training of the health workforce and policymakers to understand the scope, potential benefits, and limitations of these digital transformations [5,78,79]. Furthermore, the acute need to act during the COVID-19 pandemic resulted in divergent policies being implemented across Europe [38,40]. When combined, these factors may help explain why

disparate digital health reimbursement policies are currently in place across the studied countries.

In the specific context of digital health applications, we found two broad categories of approaches towards reimbursement in the studied countries. On one hand, digital health applications may be reimbursed per use cycle (i.e., the period that the digital health application must be used to produce positive health benefits). This fee-for-service approach has historically been easy to develop and implement, reflects the actual number of services rendered, and can create an incentive for healthcare providers to increase access to and utilization of healthcare services [80]. However, this reimbursement approach has a significant and oft-cited disadvantage, namely providing healthcare professionals with the incentive to induce demand [81,82]. In the context of digital healthcare, which can function autonomously and asynchronously, this risk may be exacerbated as health professionals no longer have to consider their own time constraints in prescribing this form of healthcare (although it could be tempered when a digital health solution is expected to be a substitute for billable services by a clinician). Consequently, a digital health economic paradox can arise, namely that digital healthcare has the potential to reduce healthcare costs relative to in-person services, but can equally well inflate healthcare spending if poorly implemented, though this is dependent on the reimbursement methods applied and whether digital health tools serve as a complement or substitute for in-person care—or some combination of the two. On the other hand, reimbursement for digital health applications may be included as part of the remuneration of a larger healthcare process, which is more compatible with diagnosis-related groups or global budget approaches to paying for healthcare. Both these approaches may be more suited than fee-for-service for realising the potential for digital healthcare to reduce costs, as they characteristically introduce incentives to improve efficiency in processes and in the allocation of resources.

Furthermore, reimbursement parity for digital health applications was explicitly introduced in Italy, though the Belgian and Israeli reimbursement approaches could produce a degree of parity as well. Parity systems are considered enablers for the uptake of digital health [21,24], though concerns exist that parity systems could impede the development of innovative care delivery models, which could limit the potential of telehealth to address high healthcare costs and complicate the introduction of value-based models [24].

In the countries examined, the pricing of digital health applications was mostly determined through discussions between committees at the national or regional level and the digital health application developers and manufacturers. However, it is presently unclear what criteria must be met to participate in these committees and if the designated institutions have the necessary capabilities to assess the worth of digital health applications [11,83]. Only Germany and the United Kingdom report the use of value-based frameworks with clear information requirements to help stakeholders navigate the price negotiations for digital

health applications. These two countries are at a more advanced stage of digital health implementation and both patients and professionals have more experience with digital health applications and its effects, which is an important foundation for the introduction of value-based reimbursement models [17].

We found that, except for Poland, there were many opportunities for financing digital health applications outside of insurance-based frameworks in the studied countries. However, there were discrepancies in the specificity of these funding opportunities, as it was unclear whether they targeted digital health specifically or health innovations more generally. Nonetheless, such funding initiatives can alleviate the financial risk for health insurers and allow patients, professionals, and insurers become accustomed to the use and effects of digital health applications, which is a key factor in their uptake [84].

Limitations

Some limitations of this study need to be considered. As is common with scoping reviews, the quality of the included studies was not assessed, which should be considered when interpreting the results. However, seeing as the aim of this article was not to validate methodological rigour to ascertain confidence in the data synthesis, but rather to collect information about reimbursement processes in different countries, the absence of a quality assessment does not inhibit the validity of this article. In fact, the information collected did not solely rely on scientific articles as country experts also ensured that the collected information was complete and correct. We also recognise the possibility of selection bias and failing to capture all relevant studies as only 3 academic databases and Google Scholar were used, and the search strategy was not exhaustive. The study focused on nine countries in the WHO/Europe region, which may not reflect the realities of other regions or countries. Furthermore, the lack of a uniform definition and classification of digital health across countries may have influenced the interpretation and comparison of reimbursement pathways. As such, caution should be exercised in interpreting and generalizing based on the findings of this study. Moreover, the rapidly evolving nature of digital health and its reimbursement pathways means that the information presented in this study may become outdated relatively quickly. Finally, the study did not explore the potential impact of reimbursement policies on patient outcomes, which could be an area of future research.

We identified several avenues for future work. First, the composition of committees that determine the price of the digital health solutions in the studied countries could be better characterized and assessed. Second, the expertise requirements to adequately assess the value and price of digital health solutions could be further investigated and potentially pooled into a comprehensive framework. Third, a comprehensive value-based and value-sensitive framework for the assessment of digital health applications should be developed. While some research in this area has already been conducted [19,85–87], no comprehensive assessment of how digital health applications generate value across different levels of health

systems has been conducted yet. Fourth, a comparative assessment of health expenditure (e.g., in the management of a particular disease) after the introduction of digital healthcare in the studied countries can offer a more sophisticated insight in how digital health interacts with different reimbursement systems to affect overall health expenditure. Fifth, it is unclear whether these findings apply to the broader spectrum of novel health technologies. Digital health is a particular type of innovation in healthcare and future work can explore how these findings translate to – for instance – the growing role of artificial intelligence (AI) in healthcare, where AI-based digital health solutions represent a unique subset of digital health products. Sixth, future research should investigate how digital health applications would be reimbursed in case of cross-country health service delivery and how these reimbursement practices interact with current international and EU legislation. Finally, future research should investigate how digital health policy has evolved over time across multiple layers of governance (e.g., international, national, and regional where applicable), and even before the COVID-19 pandemic to better understand the extent to which the pandemic accelerated the development of digital health policy holistically and how that affected the formation of reimbursement-specific policy for digital health.

Conclusions

The studied countries have been pursuing heterogeneous approaches to the reimbursement of digital healthcare. While no approach is inherently superior, a fee-for-service approach might encourage more prescribing of certain digital health solutions, which may be desirable to increase digital health utilisation for purposes such as screening, yet it equally opens the possibility of supplier-induced demand and thus inflating healthcare expenditure. Ultimately, reimbursement policies should aim to stimulate value-based integration of digital health into the healthcare ecosystem to promote equitable access to innovative healthcare technologies and improve health outcomes for patients. A clearer understanding of reimbursement and its accompanying incentives at present will help to shape more thoughtful, value-based reimbursement policies going forward. This paper can therein serve as a basis for further, more detailed research as the field of digital health reimbursement evolves.

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Conflict of interest

DNO is a staff member of the World Health Organization and is himself alone responsible for the views expressed in this publication, which do not necessarily represent the decisions or policies of the Organization. ADS reports consulting income from the U.S. department of Health and Human Services outside of the context of this project and sits on the Scientific Advisory Board of the German Society for Digital Medicine and on the Strategic Advisory Board of HumanFirst.

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Data availability

No primary data was collected for this study.

Author contributions

RVK: conceptualisation, methodology, software, validation, formal analysis, investigation, data curation, writing – original draft, writing – review & editing, visualisation, project administration

DS: conceptualisation, methodology, software, validation, formal analysis, investigation, writing – original draft, writing – review & editing, visualisation

IK: conceptualisation, methodology, software, validation, formal analysis, investigation, writing – original draft, writing – review & editing, visualisation

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GW: data curation, validation, writing – original draft, writing – review & editing

EM: conceptualisation, methodology, validation, formal analysis, writing – original draft, writing – review & editing, supervision

Ethical approval

This study has no inherent ethical implications or considerations.

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