# Review of: "Healthcare Systems Moving Toward Data Governance-Centered Model: India's G20 Presidency in the Wake of COVID"

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Thanks for submitting a well written paper. Please find below suggested perspectives and dimensions for your consideration to strengthen this interesting paper.

**How can the G20 countries collaborate to converge existing Digital Health Organizations/activities under a single overarching framework? What should be the contours of this framework?**

There is a need to shift the narrative – as well as investments – from individual, projectized digital health initiatives to an integrated, enterprise approach that prioritizes digital transformation and takes into consideration enterprise planning and architecture.  Additionally, digital transformation for health must also take into consideration the governments broader strategy, which includes other line ministries and investments in shared digital public infrastructure including identity management and payment platforms. In 2020, UN Member States ratified the Global Strategy on Digital Health which should serve as the overarching framework. The contours of this framework are articulated in various guidelines, including the Digital Implementation Investment Guide (DIIG) published by WHO in 2020. These already outlined contours focus on core digital health building blocks and the broader enabling environment, including policy, governance, coordination, standards, infrastructure, human resources and financing. However, despite this framework and guidelines being established, there has been uneven progress at national level in operationalizing them. This could be one of the G-20's priorities, and include costed blueprints and action plans, donor alignment, and systematic inclusion of resourcing within national health accounts and investment plans.

**How can G20 strive to plan for a corpus fund to support systematic planning and implementation of Digital Health, especially among LMICs?**

Investments in digital public infrastructure and digital health should be seen as a matter of national security, and as a key contributor to not only health outcomes but national socio-economic development. A corpus fund should first be framed within these parameters, as these investments when successful are much broader than just health. It is critical to make the case for such a fund to non-health sector stakeholders – including Cabinets, Ministries of Finance, etc. Digital public infrastructure has demonstrated significant return on investment across many sectors, as can be seen from India. However, additional investment cases, costed and backed by solid evidence, and speaking to this larger narrative are still required.

**How can G20 countries contribute to the democratization and promotion of digital health public goods?**

Many of the existing Digital Public Goods have been driven by donors and organizations operating out of the global north, or by a single country. To be true digital health public goods, the use-cases need to come from a variety of countries spread across multiple regions, be tested across multiple geographies, and be financially and technically supported by a diverse set of stakeholders. G-20 countries can consider 1) creating sufficient incentives to encourage diversification, including investing in partners across multiple geographies in the global south that can support existing, digital public goods; 2) supporting countries to establish interoperability labs and sandboxes to lower the barrier of entry for local entrepreneurs (India's sandbox + planned open Machine Learning libraries are a great example); 3) establishing incentives + business modeling to support the open-sourcing of promising propriety platforms; 4) addressing financing gaps for digital public good core platform support, which is often neglected; and 5) ensuring that RFPs promote and prioritize digital public goods, and ensure that they are being evaluated against clear criteria including common functionality, WHO clinical and public health guidelines, interoperability standards, cyber security and data protection.

**How can G20 collaborate with International Organizations, Philanthropies, Civil Societies, etc., to bridge the gaps in achieving at-scale implementation of digital health solutions (including tele-healthcare solutions) and Innovations?**

Digital transformation must be led by government, but to be successful – will require an aligned, "all-hands-on-deck" approach including international organizations, Civil Society Organizations, academia, the private sector, etc. No single agency can succeed on its own, and misaligned digital investments can disproportionality weaken and fragment the entire ecosystem as well as put citizens at risk. The G-20 can consider endorsing not only a common vision and set of principles but a clear operational roadmap, and ensuring that loans, grants and their respective government development agencies champion (or at least adhere) to these guidelines and best practices. Additionally, existing professional networks – such as AeHIN, PHIN, HELINA and RECANSA – should continue to be strengthened, and capacity – including via national training institutions and universities – should be prioritized moving forward.

**How can G20 countries promote digital health innovations and become an enabler for the implementation of emerging technologies such as Artificial Intelligence, Machine Learning, Blockchain, IoTs, Drones, and geo-spatial mapping aiding disease surveillance and program implementation within the G20 member states and amongst LMICs?**

G-20 countries should ensure that any investments in frontier technologies and digital health innovations address actual bottlenecks and country constraints, while not further extending the digital divide, marginalizing communities, or creating new risks for citizens. Additionally, before these innovations are endorsed or deployed at scale, sufficient evidence should exist. Many countries do not yet have policies or regulations around personal health data, standards, cyber security, etc. … which should be a priority to ensure that innovations are in compliance with emerging best practices. Supported by a digital sandbox environment, new innovations can be systematically tested. Finally, to ensure that these new technologies are designed for LMICs and mitigate as many risks as possible (including bias), open-source geo-spatial data, machine

learning data libraries, etc., should be created across as many country contexts as possible... which will also help democratize this space and create opportunities for local entrepreneurs.