

# Evaluation of Policy Domains of eHealth and Telehealth in the Philippines: A Discourse on Policy Analysis

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## ABSTRACT

**Background.** Electronic health (eHealth) refers to “a set of statements, directives, regulations, laws, and judicial interpretations that direct and manage the life cycle of eHealth.” Analytical observations on the policy framework governing eHealth and telehealth in the Philippines highlight important regulatory gaps and implementation challenges. The COVID-19 pandemic has caused substantial physical and social disruption; however, its long-term impact may be mitigated through a clear and structured pathway toward health coverage expansion using eHealth and telehealth. Establishing a coherent policy framework within the Philippine context is a critical first step.

**Objective.** This study aimed to conduct an updated environmental scan and policy analysis of existing regulatory frameworks and initiatives related to eHealth in the Philippines. Such analysis is vital to support the implementation of the Universal Health Care Law, as it provides overarching principles and a foundational structure for eHealth integration.

**Methods.** Guided by the Scope of Policy Issues in eHealth framework developed by Khoja et al., an Internet-based review of relevant laws, regulations, policies, and strategic plans was conducted using national agency websites and public databases. Documents published up to May 2021 were included to capture recent developments in Philippine eHealth policy. Identified policies were categorized according to the four policy domains described by Khoja et al.

**Results.** This study presents an updated environmental scan and analysis of policy and regulatory frameworks, as well as public and private sector initiatives related to eHealth in the Philippines. Using Khoja’s framework, policies were examined across four domains: (1) networked care, (2) interjurisdictional practice, (3) diffusion of eHealth and the digital divide, and (4) integration of eHealth with existing health systems. The findings demonstrate expanded policy activity across these domains, reflecting growing institutional recognition and support for eHealth.

**Conclusion.** There is strong momentum for continued eHealth policy development in the Philippines, driven by the COVID-19 pandemic, formal recognition of national eHealth governance structures, implementation of the Universal Health Care Law, and support from innovators and funding partners. The study identified an increasing number of policies across the four domains aimed at addressing historical implementation barriers and promoting the integration of eHealth as a standard component of healthcare delivery, education, and research. The four-domain framework remains a useful guide for policy inventory and analysis amid evolving national and global developments.

**Keywords:** telehealth, eHealth, policy analysis, Universal Health Care, environmental scanning



eISSN 2094-9278 (Online)  
Published: September 30, 2026  
<https://doi.org/10.47895/amp.v60i18.6268>  
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## INTRODUCTION

Electronic health (eHealth) is defined as “a set of statements, directives, regulations, laws, and judicial interpretations that direct and manage the life cycle of eHealth.” Telehealth is closely aligned with the concept of eHealth and refers to the use of communication, diagnostic, and information technologies to deliver healthcare services when patients and providers are separated by barriers such as geography, limited professional availability, transportation constraints, infrastructure gaps, or socioeconomic disparities. Additionally, telehealth represents an evolving approach to healthcare delivery that leverages advanced telecommunications technologies to exchange health information and provide services across geographic, temporal, social, and cultural boundaries.<sup>1-3</sup>

This study aims to conduct an updated environmental scan and policy analysis of regulatory frameworks and initiatives related to eHealth in the Philippines. Such analysis is essential for advancing Universal Health Care (UHC) implementation in the country, as it provides the overarching principles and structural foundation necessary for integrating eHealth and telehealth into the health system.

## METHODS

This policy evaluation study was guided by the framework developed by Khoja et al., which identified key factors for effective eHealth implementation at both international and national levels by examining the roles of individuals, institutions, and governments as principal stakeholders.<sup>4</sup> The framework is premised on the recognition of eHealth as a critical tool for improving healthcare delivery and health information systems, particularly for underserved populations.<sup>4</sup> This analytical approach was adopted to examine the Philippine eHealth landscape.

The selected policy domains identified by Khoja and included in this study were: (1) networked care, (2) interjurisdictional practice, (3) diffusion of eHealth and the digital divide, and (4) integration of eHealth with existing systems.<sup>4</sup>

Nearly a decade after the inventory of eHealth policies in the Philippines conducted by Salisi et al. in 2016, policies and programs are now present across the categories identified by Khoja et al.<sup>4,5</sup> Nevertheless, several structural characteristics of the Philippine health system remain unchanged: national health policies and vertical public health programs continue to fall under the purview of the Department of Health (DOH); the dual health system persists, with the private sector maintaining a dominant role in service provision; and health services remain devolved to local government units (LGUs), which primarily serve low- and middle-income populations.

Using the *Scope of Policy Issues in eHealth* framework developed by Khoja et al, an Internet-based search and review of relevant laws, regulations, and strategic plans was conducted.<sup>4</sup> Sources included official websites and databases

of national agencies such as the DOH, the Department of Transportation and Communications (DOTC), and the Philippine Congress.

A systematic process of data extraction and analysis was undertaken. First, all laws, regulations, and guidelines promulgated by Congress or relevant national agencies that directly or indirectly addressed eHealth were identified. Policies reflecting developments up to 2021 were included. These documents were then categorized according to the policy domains outlined by Khoja et al.<sup>4</sup> Subsequently, a structured policy analysis was conducted to assess the extent to which Philippine eHealth initiatives align with these domains.

The literature review drew from multiple sources, including PubMed, Google Scholar, and other academic databases, as well as Philippine literature on laws, policies, and regulatory instruments relevant to eHealth.

The primary research objective was to identify and track laws, policies, and programs shaping the Philippine eHealth landscape across the policy domains defined by Khoja et al., specifically: (1) networked care, (2) interjurisdictional practice, (3) connectivity and diffusion of eHealth (addressing the digital divide), and (4) integration into existing systems.

This study was exempted from ethics clearance as it involved secondary analysis of publicly available laws, policies, and programs and did not involve human subjects or patient data. The research received approval from Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ) GmbH under a public-private partnership project on telemedicine services for COVID-19 in collaboration with the Cooperative Health Management Federation (CHMF).

## RESULTS AND DISCUSSION

The early part of the millennium saw pioneering eHealth projects in the Philippines; this reflected the emerging global interest in eHealth, especially in resource-poor settings. The University of the Philippines Manila *Buddyworks* Telehealth project was the first-ever nationwide implementation intended to revolutionize care, especially for rural areas. Teleconsultation between health workers in these sites through the Buddyworks platform was facilitated with urban-based medical specialists (of the University of the Philippines Philippine General Hospital-College of Medicine). It was funded from the eGovernment program (eGov) of the then-newly organized Commission on ICT (CICT); eGov intended to jumpstart increased innovative and collaborative use of ICT in government processes. Another round of eGov funds financed the Social Protection Support Initiatives (SPSI), which consisted of three convergent projects implemented in Mindoro province. These were the “Sigurado at Garantisadong Insurance Pangkalusugan (SAGIP) of PhilHealth, Watching Over Mothers and Babies (WOMB) of the DOH, and Sustaining Interventions in Poverty Alleviation and Governance (SIPAG) of the DSWD. These

aimed at improving the level of well-being and economic status of targeted poor families and individuals through better and coordinated delivery of social protection services using advanced information and communication systems technology.”

However, the enactment of the Universal Health Care Act in 2019 (UHC Act, RA 11223) promises sweeping reforms towards more “equitable access to quality and affordable health care and protection against financial risk”.<sup>6</sup> All Filipino citizens are now automatically considered eligible to access individual-based health services and benefits covered by the National Health Insurance Program (NHIP), as well as “population-based” services.

The national UHC law and subsequent executive/administrative policies fully enshrined the value of eHealth in facilitating universal access to quality care.<sup>6</sup> The National eHealth Program led by DOH-KMITS now prioritizes: [1] patient data availability across all health facilities to monitor performance and responsiveness; [2] internet in all facilities, and connected health facilities with interoperable eHealth systems; and [3] telehealth to be used within the HCPN.

According to Khoja et al., *Networked Care* refers to the actions and policies needed to promote an environment that supports the implementation of eHealth applications and programs.<sup>4</sup> Specifics of this policy domain are enumerated in Table 1 with the corresponding Philippine Laws that directly or indirectly target the issues listed.

## Creating an Enabling Environment

The first policy category is *creating an enabling environment*, which discusses the issues that government policies and legislation should address to encourage the utilization of eHealth in the country. The guiding resource for the creation of an enabling environment is the Philippine eHealth Strategic Framework and Plan (PeHSFP) 2014-2020, released by the DOH and the Department of Science and Technology (DOST). The DOH is mandated to spearhead the integration of eHealth into the local health system in support of the Universal Healthcare Act, which advocates for accessible healthcare for all Filipinos. The eHealth action plan within the framework is composed of the following seven components: (1) governance, (2) legislation,

**Table 1.** Networked Care Policy Domains and Corresponding Philippine Policies and Laws

| Policy Categories                                      | Issues                                                   | Policies that exist to address issues                                                                                                                                                                                                                                                                                                                   |
|--------------------------------------------------------|----------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Creating an enabling environment</b>                | Commitment of funds by the organization and governments  | <ul style="list-style-type: none"> <li>• DICT EGMP 2022<sup>7</sup></li> <li>• National Broadband Plan<sup>8</sup></li> </ul>                                                                                                                                                                                                                           |
|                                                        | Readiness and effective change management                | <ul style="list-style-type: none"> <li>• DICT EGMP 2022<sup>7</sup></li> <li>• National Government Portal [under the EGMP]<sup>7</sup></li> <li>• Philippine eHealth Strategic Plan and Framework 2014-2020<sup>9</sup></li> <li>• The eHealth Systems and Services Act (HB 665)<sup>10</sup></li> </ul>                                                |
|                                                        | Deployment of appropriate technologies                   | <ul style="list-style-type: none"> <li>• DICT EGMP 2022<sup>7</sup></li> <li>• National Broadband Plan<sup>8</sup></li> <li>• Government Network (GovNet) [under the EGMP]<sup>7</sup></li> </ul>                                                                                                                                                       |
|                                                        | Proper distribution of human resources                   | <ul style="list-style-type: none"> <li>• None</li> </ul>                                                                                                                                                                                                                                                                                                |
|                                                        | Reimbursements/remuneration                              | <ul style="list-style-type: none"> <li>• National Health Insurance Program (NHIP) of the Philippine Health Insurance Corporation [thru the UHC]<sup>6</sup></li> </ul>                                                                                                                                                                                  |
|                                                        | Meeting the needs of Insurance Companies                 | <ul style="list-style-type: none"> <li>• Prudential's Pulse mHealth application<sup>11</sup></li> <li>• Guidelines on Electronic Commerce of Insurance Products<sup>12</sup></li> <li>• UHC IRR Rule VII Section 28 Affordability<sup>13</sup> (Complementation of Private Health Insurance and Health Maintenance Organization)<sup>6</sup></li> </ul> |
| <b>Sharing of information, knowledge, and practice</b> | Sharing of patient information                           | <ul style="list-style-type: none"> <li>• DICT EGMP 2022<sup>7</sup></li> <li>• Integrated Government Philippines (iGovPhil) Project<sup>14</sup></li> <li>• UHMIS<sup>7</sup></li> </ul>                                                                                                                                                                |
|                                                        | Sharing of knowledge                                     | <ul style="list-style-type: none"> <li>• DICT EGMP 2022<sup>7</sup></li> <li>• Integrated Government Philippines (iGovPhil) Project<sup>14</sup></li> <li>• Government Cloud [under the EGMP]<sup>7</sup></li> <li>• UHMIS<sup>7</sup></li> </ul>                                                                                                       |
|                                                        | Sharing of services, e.g., consultations, pharmacy, etc. | <ul style="list-style-type: none"> <li>• DICT EGMP 2022<sup>7</sup></li> <li>• Integrated Government Philippines (iGovPhil) Project<sup>14</sup></li> </ul>                                                                                                                                                                                             |
| <b>Making transfer of information easier</b>           | Functional interoperability                              | <ul style="list-style-type: none"> <li>• Philippine e-Government Interoperability Framework (PeGIF)<sup>14</sup></li> </ul>                                                                                                                                                                                                                             |
|                                                        | Semantic interoperability                                | <ul style="list-style-type: none"> <li>• Philippine e-Government Interoperability Framework (PeGIF)<sup>14</sup></li> </ul>                                                                                                                                                                                                                             |
|                                                        | Standardization measures for EHRs                        | <ul style="list-style-type: none"> <li>• Philippine e-Government Interoperability Framework (PeGIF)<sup>14</sup></li> <li>• DOH AO 2015-0037: National Implementation of Health Data Standards for eHealth Standardization and Information Interoperability<sup>15</sup></li> </ul>                                                                     |