

# Extensions Process Frequently Asked Questions

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### What types of extensions exist?

There are **two types** of extensions that may be granted under the Share by Default legislation:

- **Extension to register** with My Health Record (*Note: wherever possible, organisations are encouraged to complete the registration process, even if they will require more time to share information to My Health Record. Learn more: [Implementing My Health Record in your healthcare organisation.](#)*)
- **Extension to share information** with My Health Record.

### I am a radiologist or pathologist, but I don't run my own business – do I need an extension?

As an **individual** radiologist or approved pathology practitioner, reports prepared by or on your behalf will need to be uploaded by the healthcare organisation(s) that you are associated with. This is explained further below:

Under the Share by Default Rules, healthcare provider organisations and specified healthcare practitioners must share pathology or diagnostic imaging reports to My Health Record by default.

This includes radiologists and pathologists as defined in the My Health Record (Share by Default) Rules 2025.

However, only healthcare **organisations** are eligible to register for and connect to My Health Record. Therefore, in practice individual radiologists and pathologists must be associated with a healthcare provider organisation that is registered with My Health Record and shares pathology or diagnostic imaging reports to the system as required.

Note that individuals who run their own business as a sole trader, partnership, or trust can register and connect to My Health Record and are required to share their own pathology or diagnostic imaging reports to the system.

### My organisation needs an extension - which type of extension should I apply for?

The type of extension you need will depend on your organisation type and whether it is already registered with My Health Record.

Prior to expiry of an extension, organisations must ensure that they have registered and commenced sharing information with My Health Record, or have applied for another extension.

The table below is intended as a guide only and does not consider the unique circumstances of each organisation.

Type of Organisation	Not yet registered with My Health Record (and won't be registered by 1 July 2026)	Already registered with My Health Record (or will be registered by 1 July 2026)
<ul style="list-style-type: none"> <li>Foreign Corporation (i.e. a corporation incorporated outside of Australia but registered to operate in Australia)</li> <li>Australian Corporation (i.e. a company incorporated in Australia) including state and territory corporations or other incorporated entities or bodies</li> </ul>	My Health Record registration extension	My Health Record sharing extension
<ul style="list-style-type: none"> <li>Trust</li> <li>Partnership</li> <li>Sole Trader</li> <li>Unincorporated entity or association (including State or Territory unincorporated entity or association)</li> </ul>	My Health Record sharing extension	My Health Record sharing extension

Note that organisations who apply for, and are granted, a My Health Record registration extension may also be granted a concurrent sharing extension for at least the same period.

### Who can apply for an extension on behalf of an organisation?

Only an individual who is an **authorised contact** for an organisation can submit an extension application on behalf of that organisation. **Authorised contacts** include:

- for organisations that are not yet registered with My Health Record: the Authorised Contact listed in the Australian Business Register ([ABR](#)) for each organisation listed in the application, or another person who is authorised to make the application on behalf of the organisation.
- for organisations that are already registered with My Health Record: the Responsible Officer (RO) or an Organisation Maintenance Officer (OMO) listed in the Health Professional Online Services ([HPOS](#)) system for each organisation listed in the application.

### How long an extension can I apply for?

The duration of your extension will be decided by the Agency on a case-by-case basis, having regard to the information provided as part of the application.

### When should I apply for an extension to register or share information with My Health Record by default?

If your organisation is subject to the Share by Default requirements and will not be able to comply from 1 July 2026, you must have an approved extension in place or have submitted an application to the Agency by 1 July 2026 (with the outcome pending).

You should only apply for an extension of time to register or share information with My Health Record by default if you will not be able to comply with the requirements from 1 July 2026.

Before applying for an extension, organisations are strongly encouraged to follow the steps to [Implement My Health Record](#) – this includes completing the registration process and connecting to My Health Record.

If you require assistance with the registration process, please let us know: phone: [1300 901 001](tel:1300901001) during business hours or email: [help@digitalhealth.gov.au](mailto:help@digitalhealth.gov.au).

Where an application for an extension is not approved the organisation will be required to comply with registration and sharing requirements from 1 July 2026 (or from the date of the determination, where this is made after 1 July 2026).

Note that if you are not complying with the Share by Default requirements from 1 July 2026 and do not have an in progress or approved application in place, you may be subject to civil penalties and/or required to repay Medicare benefits paid for services performed after that date.

### Can I apply for an extension before the Share by Default requirements take effect?

Yes – Applications for an extension are expected to open in March 2026.

If your organisation will not be able to comply with the Share by Default requirements by 1 July 2026 you should submit an extension application prior to the requirements commencing on 1 July 2026.

### How do I apply for an extension?

Applications for an extension **must be lodged** via the [Share by Default Extensions Portal](#). You will need to register for a user account before logging in to the portal for the first time.

The [extensions process checklist](#) outlines the information that you need to gather prior to accessing the portal to lodge your application.

### If I am required to register with My Health Record and need an extension of time to register, do I also need to apply for an extension of time to share information with My Health Record by default?

In most cases, organisations that are granted a registration extension will be granted a concurrent sharing extension for at least the same period as their registration extension. This is to allow your organisation time, following registration, to begin sharing information to My Health Record before becoming subject to sharing requirements. Each grant of a concurrent sharing extension approval will be made considering the circumstances of the case and relevant considerations (see below question 'What will the Agency consider when deciding whether to grant an extension?').

If, following registration, your organisation will still not be ready to commence sharing information to My Health Record by expiry of the sharing extension, you will need to apply for an additional sharing extension via the [Share by Default Extensions Portal](#).

### I've been granted a registration extension which hasn't expired yet but am now registered with My Health Record. What should I do?

Once your organisation has registered with My Health Record, you should make sure you are ready to share reports with My Health Record prior to expiry of the concurrent sharing extension that you received. The expiry date for your sharing extension will be listed on the notice of decision that was issued to you when your extension was approved.

### I've been granted a sharing extension which hasn't expired yet but am now ready to start sharing information to My Health Record by default. What should I do?

If you have been granted an extension of time to share information with My Health Record by default and you are now ready to share the required information you can begin sharing the required information. There is no obligation to advise the Agency before doing so.

### Can I apply for extensions for multiple organisations using the same application form?

Yes - one application form can be used for multiple organisations provided that the organisations meet ALL of the following requirements:

- require the same type of extension (i.e. registration or sharing extension)
- have the same organisation type (see the organisation types listed in question 2)
- require an extension to register or share with My Health Record for the same reason(s)
- the supporting evidence provided applies to all organisations
- the applicant is an authorised contact for each organisation listed on the form (see FAQ "Who can lodge an extension application").

*Note:* each organisation will be assessed individually and will be the basis of a separate decision on its merits.

### My organisation is not yet registered with My Health Record - How can I check whether I am an Authorised Contact in the ABR?

You can find information on how to check if you are an authorised contact in the ABR for your entities [here](#).

Note that if you are not an authorised contact in the ABR for your organisation, you can still apply for an extension on your organisation's behalf, provided that you are authorised to make the application on behalf of your organisation. You will be required to attest that you have been authorised to make the application on your organisation's behalf when submitting your application..

### For organisations already registered with My Health Record - How can I check whether I am the Responsible Officer (RO) or an Organisation Management Officer (OMO)?

You can check this by logging into PRODA and navigating to the Health Professional Online Services (HPOS). To do this, select "My programs" > Healthcare Identifiers and My Health Record" > "Healthcare

Identifiers – Manage existing records”. Then, select your organisation and click on “My organisation details.” Information on how to update these details can be found [here](#).

### What will the Agency consider when deciding whether to grant an extension?

Each extension application will be assessed on a case-by-case basis. When deciding whether to grant an application for extension, the Agency will consider:

- the organisation’s size (based on, for example, number of health services provided, number of staff, financial turnover) and technological readiness
- the potential disruption (if any) to the provision of healthcare if the healthcare provider organisation does not share information with the My Health Record system, and
- any other matter that the Agency considers relevant, such as any other obstacles or barriers that may prevent you from registering or sharing information with My Health Record.

### What sort of information and evidence do I need to submit with my extension application?

Information required to lodge an application for each extension type can be found in the [extensions process checklist](#).

You should provide any information and evidence that supports your extension application. This will depend on the type of extension being applied for as well as each organisation’s circumstances. At a minimum, we recommend that you include information in relation to:

- details of barriers or obstacles preventing you from registering or sharing with My Health Record
- your action plan to complete registration or commence sharing with My Health Record. The plan should include the steps involved, along with expected dates for completion of each step
- for a registration extension, details of attempts made to register for My Health Record and why you were unsuccessful.

Examples of supporting evidence that may be provided include documents showing:

- the organisation’s size (e.g. based on number of patients seen per day or staff headcount)
- the organisation’s location (e.g. where the entity is located in a rural area)
- a lack of reliable internet connection (e.g. provider outage or coverage reports)
- software being used at the organisation (e.g. screenshots).

If you cannot provide evidence in relation to a particular claim, such as when information is confidential or commercially sensitive, you may provide a [statutory declaration](#) confirming the information you are providing is true and correct.

### I’ve lodged my application for an extension, what happens next?

Once you have lodged your application, you will receive an email acknowledging that we have received it. We will then assess your application, including all information and supporting evidence provided. Where necessary, we may write to you and request that you provide additional information to support your

application. If you receive such a request, you must comply with the request within 28 days, or we may cease considering your application.

Once your application has been decided, you will be notified in writing of the outcome. If approved, your extension will specify an end date. If not approved, you must comply with the requirement to register and share information with My Health Record by default, or you may request that the Agency reconsider its decision.

During the period that your application is being decided, as well as the extension period, you must display a notice ensure that you are complying with applicable notice display requirements. Refer to the [Better and Faster Access to health information](#) page for more information.

### How do I check the status of my application once I've submitted it?

You can check the status of your extension application by logging into the [Share by default Extensions Portal](#) and navigating to 'My Applications'. This will display a list of your submitted applications and their status (for example, 'submitted', 'further information requested', 'approved', 'extension expired').

### My extension has expired/is about to expire - can I request another extension?

Yes, you can apply for an additional extension if your extension has expired or you are approaching the end of your current extension period and still need more time to comply.

Note that if there is any gap between when your current extension expired and a new extension application is submitted, you may be subject to civil penalties and/or required to repay Medicare benefits paid for services performed during the gap period. For this reason, should you need to apply for a new extension, you are encouraged to do so prior to your current extension expiring.

Each new application will need to justify the need for an additional extension and detail how you have progressed towards being able to comply with the requirement to share information with My Health Record by default during the current extension period.

### I've received a request to provide further information, what should I do?

You must respond to any request for further information from us within 28 days. Failure to do so may mean that we cease considering your extension application.

### My application was not approved, and I do not agree with the outcome - what can I do?

If you disagree with the Agency's decision, you can ask for it to be reconsidered. You must submit your request for reconsideration via the Extensions Process Application Portal within 28 days of receiving the notice that your application was not approved. We will let you know in writing of the outcome. If you are still not satisfied with the decision, you can apply to the Administrative Review Tribunal (ART) ([art.gov.au](http://art.gov.au)) for a review. The ART will only review decisions that have already been reconsidered by the Agency.

### I need assistance with completing the application process, where can I find support?

If you require additional assistance completing your application for an extension you can call the My Health Record Help Line (1800 723 471) and select option 2.

### I need to update my contact details on the application – how do I do this?

You can update your contact details (e.g. email, phone number) by logging into the [Share by Default Extensions Portal](#), navigating to the 'My Applications' screen and clicking on the relevant application number. This will open a messaging function which you can use to lodge a request for your contact details to be updated. The Extensions Team will review your request and update your details in the system. If the team needs anything further from you, they will get in touch.

### I am leaving my organisation or going on leave for an extended period of time – how can I ensure that other people in my organisation are aware of the status of my application?

You can request an update to the contact details on your extension application, so that someone else in your organisation can receive updates while you are away. To do this, log in to the Extensions Portal, navigate to the 'My Applications' page and click on the relevant application number. This will open the messaging function which you can use to lodge a request for the contact details to be updated.

Please note that, before we can make this change, the person you nominate must already be listed in HPOS as an authorised representative (Responsible Officer or Organisation Maintenance Officer) for your organisation or, if your organisation is not yet registered with My Health Record, be authorised to act as the contact person on the organisation's behalf. When you return, you can use the same messaging function to request that the contact details are changed back to your own.