

Emergency Ambulance Service (EAS) Regulations
Medical Transport Service (MTS) Regulations
Frequently Asked Questions

Table of Contents

A. Transition from the Voluntary Accreditation Scheme (VAS) to Healthcare Services Act (HCSA) Regulations	3
1. When will the EAS and MTS Regulations under HCSA come into force?	3
2. How will PAOs who are currently accredited under the VAS transition to HCSA?	3
3. What should PAOs who are not accredited under the VAS do if they wish to continue operating under HCSA?	3
4. Will PAOs who are accredited under the VAS be able to update the vehicle information prior to HCSA coming into force?	3
5. What should PAOs do if they do not intend to continue providing ambulance services once HCSA comes into force?	4
6. What are the costs involved for the transition of PAOs accredited under the VAS to HCSA?	4
7. What are the various types of service licences related to private ambulance services under HCSA?	4
8. Will PAOs be able to cope with the new requirements? Will regulations be too onerous for smaller players to invest and upgrade their fleet of ambulances to serve as emergency ambulances?	5
B. Requirements in the HCSA EAS and MTS Regulations.....	5
Part 1 General Licensing.....	5
9. What are the key areas that will be regulated?	5
10. Are there any differing/ additional requirements from the current MOH Standards for EAS/MTS (2017) that will be under the new regulations?	5
11. Is there a limit to the number of ambulances allowed per licence?	5
12. Can an EAS licensee also provide MTS? Does a separate licence need to be applied?	6
13. Do the EAS and MTS Regulations only cover land vehicles, and not other modes of conveyances (e.g. air)?	6
Part 2 Organisation, Management and Governance of Licensees	6
14. Can I appoint the same person to be the Principal Officer (PO) and Clinical Director (CD)?	6
15. What is the requirement for the CD to demonstrate good standing?	6

16. For EAS, in the event where there is no person with relevant experience in disciplines that manage acute and critical patients to be appointed as CD in my company, what should I do?	6
17. What if I am unable to appoint a Key Appointment Holder that is able to meet the requirements stipulated in the Code of Practice?.....	7
Part 3 Licensee Personnel	7
18. Can the same ambulance service crew be used to account for the staffing number for more than one ambulance?.....	7
19. Can in-training personnel (i.e. pending certification/qualification) be counted towards the minimum requirement for ambulance service crew?.....	7
Part 4 Requirements for Conveyance and Equipment.....	7
20. What are the technical requirements that each ambulance vehicle must meet?	7
21. Is there any vehicular requirement for ambulances under the new regulations?	7
22. For PAOs who are already currently on board the VAS, would they still need to be re-inspected prior to the implementation of HCSA?	8
Part 5 Provision of Healthcare Services	8
23. In the event where an MTS patient deteriorates into an emergency condition during transport, what should the MTS provider do?	8
24. How would the licensee know which hospital to send patients (i.e. Emergency/ non-Emergency) to?	8
25. Will HCSA regulate the pricing of private ambulance services?.....	9
26. In the event of an emergency which involves a first-time patient, how are we able to convey the common charges before accepting the patient?	9
Part 6 Regulatory Controls on PAOs and Vehicles.....	9
27. What aspects of the EAS and MTS will be inspected under HCSA?.....	9
28. When and how will inspections/audits be conducted on private ambulance services?.....	9
29. What are the disciplinary actions that can be taken on accredited / licensed PAOs for non-compliance?.....	10
30. What are the disciplinary actions that can be taken for unlicensed PAOs operating under HCSA?	10
Part 7 Miscellaneous	10
31. What should I do if I wish to import an EAS/MTS vehicle for use in Singapore?	10
32. Will EAS and MTS vehicles have free parking?	10

A. Transition from the Voluntary Accreditation Scheme (VAS) to Healthcare Services Act (HCSA) Regulations

<p>1. When will the EAS and MTS Regulations under HCSA come into force?</p>
<ul style="list-style-type: none"> The EAS and MTS Regulations under HCSA will come into effect on 1 Sep 2021. Private ambulance operators (PAOs) who intend to provide private ambulance services in the form of EAS and/or MTS will be licensed under HCSA.
<p>2. How will PAOs who are currently accredited under the VAS transition to HCSA?</p>
<ul style="list-style-type: none"> Currently, PAOs assessed to have met MOH Standards for EAS and MTS (2017) for ambulance services are accredited under the VAS. Accredited PAOs would have attained the Letter of Accreditation (LOA) and the Certificate of Compliance (COC) for each vehicle. Accredited PAOs will have their LOAs converted to a service licence under HCSA. Existing information from accredited PAOs captured in the electronic licensing system (eLIS) will be mapped over to the new IT system used for licence application under HCSA. MOH will be working with the accredited PAOs during the administrative black-out period from 1 Jun 2021 to 31 Aug 2021 to port-over the information to the HCSA licensing regime.
<p>3. What should PAOs who are not accredited under the VAS do if they wish to continue operating under HCSA?</p>
<ul style="list-style-type: none"> PAOs who are not accredited under the VAS would have to either apply to come on board the VAS prior to the application deadline or apply for a healthcare service licence before the EAS and MTS Regulations come into force. The deadline for the application to come on board the VAS is 31 May 2021 2359H. This is to allow sufficient time to process and transit successful applications to HCSA so as to ensure continuity of the services. PAOs who are assessed to have met the standards will be accorded a service licence under HCSA. Between 1 June 2021 to 31 August 2021, MOH will not be processing any applications. Applications beyond the stipulated deadline of 31 May 2021 2359H will be taken as new applications under HCSA and the inspections for these new applications will only be arranged from 1 September 2021 onwards. To ensure continuity of service, PAOs that are not under the VAS and do not apply for the VAS by 31 May 2021 will have to make their applications for a HCSA licence by 1 July 2021 if they wish to continue with service from 1 September 2021 onwards.
<p>4. Will PAOs who are accredited under the VAS be able to update the vehicle information prior to HCSA coming into force?</p>
<ul style="list-style-type: none"> PAOs accredited under the VAS who wish to update vehicle information (i.e. add or remove vehicles) may do so by the same application deadline of 31 May 2021. Applications beyond the stipulated deadline will be processed as an amendment under HCSA where amendment fees may apply.

<p>5. What should PAOs do if they do not intend to continue providing ambulance services once HCSA comes into force?</p>
<ul style="list-style-type: none"> • PAOs who do not intend to provide ambulance services under HCSA must either convert their existing tax-exempt vehicles out of the ambulance scheme into other categories of normal tax-payable vehicles or deregister their vehicles through the Land Transport Authority (LTA) before the EAS and MTS regulations under the HCSA come into force. For vehicle scheme conversion, there will be a need to pay for a Certificate of Entitlement (COE) in the appropriate vehicle category and the respective vehicular fees and taxes (e.g. Additional Registration Fee (ARF), Road Tax, Excise Duties). PAOs may also deregister their vehicles by: (a) disposing of them at any LTA-authorized scrapyard; or (b) exporting the vehicles. Vehicle scheme conversions and/or valid proof of disposal must be submitted to LTA.
<p>6. What are the costs involved for the transition of PAOs accredited under the VAS to HCSA?</p>
<ul style="list-style-type: none"> • PAOs will only have to pay an administrative fee of \$100 for registration during the VAS period to obtain the LOA and COC for each vehicle. The LOA will be converted to a service licence once HCSA comes into force. • PAOs who are not on-board VAS prior to HCSA coming into force will have to pay the licensing fees during the application under HCSA. More details on licensing fees under HCSA will be separately released in Q2 2021. • PAOs who are not on-board VAS will also have to incur downtime and opportunity costs in terms of the time taken from inspection of their vehicles to the approval and issuance of the service licence before being allowed to operate after 1 Sep 2021.
<p>7. What are the various types of service licences related to private ambulance services under HCSA?</p>
<ul style="list-style-type: none"> • PAOs who intend to provide MTS conveyances will be required to hold a valid MTS HCSA service licence. Likewise, PAOs who intend to provide EAS conveyances will be required to hold a valid EAS HCSA service licence. • PAOs with a mixture of EAS-equipped and MTS-equipped vehicles providing the respective types of conveyances can either hold two separate service licences or an EAS-MTS bundled service licence (refer to question 9 for more details on the fees for different types of service licences under HCSA). • PAOs with EAS-equipped ambulances may also choose to use the ambulances to provide MTS and ferry non-emergency patients, by virtue of the higher standards for EAS ambulances.

<p>8. Will PAOs be able to cope with the new requirements? Will regulations be too onerous for smaller players to invest and upgrade their fleet of ambulances to serve as emergency ambulances?</p>
<ul style="list-style-type: none"> • We have been regularly engaging PAOs on the new regulatory framework since 2017 to ensure that the industry is kept up to date and informed of the requirements. MOH has also worked with various agencies, such as the Alice Lee Institute of Advanced Nursing, Institute of Technical Education and Nanyang Polytechnic, to ensure there are training programmes to upgrade the skills of existing ambulance personnel and ensure they have sufficient time to meet the crew requirements under the new standards. • Since 1 January 2018, MOH has also been actively encouraging the providers to voluntarily accredit themselves to the new standards under the VAS, so as to raise their service standards earlier and transition into the licensing framework under the HCSA. The Paramedic Transition Scheme (PTS) was also rolled out since January 2019 to allow existing ambulance personnel who are not holding approved paramedic or Emergency Medicine Technicians (EMT) qualifications a one-off opportunity to obtain approval to practice as paramedics, thereby allowing PAOs to meet the personnel qualification requirements under VAS and the EAS and MTS Regulations under HCSA. • MOH will continue to engage and work with PAOs to come on board the VAS by the application deadline 31 May 2021.

B. Requirements in the HCSA EAS and MTS Regulations

Part 1 General Licensing

<p>9. What are the key areas that will be regulated?</p>
<ul style="list-style-type: none"> • The EAS and MTS Regulations under HCSA will stipulate requirements for governance, quality assurance, ambulance crew personnel, equipment, medical management, medication supply, infection control and fee transparency.
<p>10. Are there any differing/ additional requirements from the current MOH Standards for EAS/MTS (2017) that will be under the new regulations?</p>
<ul style="list-style-type: none"> • Under HCSA, additional requirements for licensees of EAS/ MTS services include enhanced governance structures, requirements for proper medication supply and storage, conveyance requirements for Emergency and non-Emergency patients, and fee transparency.
<p>11. Is there a limit to the number of ambulances allowed per licence?</p>
<ul style="list-style-type: none"> • There is no limit to the number of ambulances allowed per licence.

<p>12. Can an EAS licensee also provide MTS? Does a separate licence need to be applied?</p>
<ul style="list-style-type: none"> • EAS licensees with EAS-equipped ambulances may choose to use the ambulances to provide MTS and ferry non-emergency patients without having to hold a separate MTS service licence. However, the siren and beacon lights in the EAS vehicles are only to be used when transporting an Emergency Patient. • PAOs will need to hold separate EAS and MTS service licences if the fleet of ambulances contains both EAS-equipped and MTS-equipped vehicles.
<p>13. Do the EAS and MTS Regulations only cover land vehicles, and not other modes of conveyances (e.g. air)?</p>
<ul style="list-style-type: none"> • The EAS and MTS Regulations of HCSA are focused on ground conveyances operating as Emergency Ambulances or Medical Transport, and do not cover other modes of conveyances.

Part 2 Organisation, Management and Governance of Licensees

<p>14. Can I appoint the same person to be the Principal Officer (PO) and Clinical Director (CD)?</p>
<ul style="list-style-type: none"> • The same person may be appointed as the PO and CD as long as the person fulfils the requirements of the PO and CD and is able to take on the associated roles and responsibilities.
<p>15. What is the requirement for the CD to demonstrate good standing?</p>
<ul style="list-style-type: none"> • This means that the doctor or nurse must not have been subject to any disciplinary actions by a Disciplinary Tribunal of the Singapore Medical Council or the Singapore Nursing Board (whichever is applicable) for the preceding three years before appointment as a CD. • This requirement is based on our concern with appointing doctors and nurses found guilty of more serious offences that suggests a defect in character or a lack of professionalism, and/or poor competency which may impede their ability to manage critical clinical incidents or otherwise predispose them to acts that can compromise patient safety.
<p>16. For EAS, in the event where there is no person with relevant experience in disciplines that manage acute and critical patients to be appointed as CD in my company, what should I do?</p>
<ul style="list-style-type: none"> • The provision of EAS services should not continue until a CD is appointed. The list of approved CD can be found at: https://www.moh.gov.sg/licensing-and-

<p>regulation/regulations-guidelines-and-circulars/details/list-of-approved-clinical-directors-for-private-ambulance-operators.</p> <ul style="list-style-type: none"> To seek assistance on CD-related matters, PAOs can also email to the Unit for Pre-Hospital Emergency Care (UPEC) at: enoch.chan.k@upec.sg.
<p>17. What if I am unable to appoint a Key Appointment Holder that is able to meet the requirements stipulated in the Code of Practice?</p>
<ul style="list-style-type: none"> To allow greater flexibility for businesses to meet these clinical qualification/governance requirements, the Clinical Director (CD) can fulfil the requirements and the KAH will be exempted from the clinical qualification requirement. Please refer to the FAQs for the Code of Practice for further information.

Part 3 Licensee Personnel

<p>18. Can the same ambulance service crew be used to account for the staffing number for more than one ambulance?</p>
<ul style="list-style-type: none"> The number and qualifications of the ambulance crew must commensurate with the number of licensed ambulance vehicles in accordance with the EAS/MTS Regulations under HCSA. For example, an EAS licensee shall have a service crew comprising at least 2 appropriately qualified staff for each vehicle: <ol style="list-style-type: none"> At least one qualified emergency ambulance driver; and At least one crew leader who is an appropriately qualified Ambulance Paramedic, Ambulance Nurse or Ambulance Doctor.
<p>19. Can in-training personnel (i.e. pending certification/qualification) be counted towards the minimum requirement for ambulance service crew?</p>
<ul style="list-style-type: none"> Trainees / other staff not stipulated in the Regulations will not count towards fulfilment of the minimum requirements for ambulance service crew.

Part 4 Requirements for Conveyance and Equipment

<p>20. What are the technical requirements that each ambulance vehicle must meet?</p>
<ul style="list-style-type: none"> The Land Transport Authority (LTA) requires all vehicles, including EAS and MTS vehicles, to be registered for use in Singapore and to comply with the registration and technical requirements set out in the Road Traffic Act and its subsidiary legislations under the Goods Vehicle class.
<p>21. Is there any vehicular requirement for ambulances under the new regulations?</p>
<ul style="list-style-type: none"> Under HCSA, the vehicular requirements for ambulances which was previously stated in the 2017 Standards for EAS & MTS will be promulgated into the EAS and MTS Regulations and accompanying licensing terms and conditions. The vehicle must also

<p>be able to accommodate: (a) the conveyance of lying and/or seated patients, and should not compromise their safety, or the safety of the ambulance crew at any time; and (b) all mandatory equipment and manpower without compromising safety or care of both patient/s and crew of the ambulance.</p>
<p>22. For PAOs who are already currently on board the VAS, would they still need to be re-inspected prior to the implementation of HCSA?</p>
<ul style="list-style-type: none"> • MOH may conduct inspections/audits on PAOs following the VAS accreditation to assess compliance to the Standards. Accredited PAOs must ensure continued adherence to the Standards ahead of the regulations for PAOs coming into force.

Part 5 Provision of Healthcare Services

<p>23. In the event where an MTS patient deteriorates into an emergency condition during transport, what should the MTS provider do?</p>
<ul style="list-style-type: none"> • The MTS ambulance should engage SCDF immediately if: <ul style="list-style-type: none"> (a) The MTS arrives on scene and triages the patient to be emergency case (i.e. a PAC1 patient) and/or (b) The MTS patient deteriorates into an emergency condition and the vehicle is more than five minutes away from the hospital. In which case, the MTS crew is expected to stop at the roadside and continue with CPR/AED and life saving measures until SCDF arrives and proper handover to the SCDF is performed. • However, if the patient deteriorates into an emergency condition when the vehicle is five minutes or less than five minutes away from the hospital, the MTS should contact SCDF or their own Control Centre, for assistance to notify the hospital of their arrival.
<p>24. How would the licensee know which hospital to send patients (i.e. Emergency/non-Emergency) to?</p>
<ul style="list-style-type: none"> • PAOs should develop and institute a clear triaging framework to determine the acuity of a patient's medical condition (e.g. whether the patient is an Emergency or a non-Emergency Patient) before conveying the patient. • PAOs must transport: (a) Emergency Patients who are either already in a state of cardiovascular collapse, or in imminent danger of collapse; and (b) All other Emergency Patients that have not given an indication to be ferried to a hospital of choice to the nearest public hospital with an A&E department that possesses the appropriate on-site specialties (e.g. adult cases to the nearest public general hospital, and paediatric cases to National University Hospital or KK Women's and Children's Hospital, whichever is nearer).

<ul style="list-style-type: none"> • With the exception of the above scenarios for Emergency Patients, where the patient has indicated to be ferried to a hospital of choice, licensees of the EAS and MTS will ferry the patient to the patient’s hospital of choice.
<p>25. Will HCSA regulate the pricing of private ambulance services?</p>
<ul style="list-style-type: none"> • While MOH does not regulate the fees and charges of any healthcare service, under the HCSA Regulations, there are requirements for all licensees, including PAOs, to publish common charges for services they provide (e.g. displaying their fees prominently on their official website) and provide transparency to the bill components. • To bring about greater price transparency for consumers, MOH had since worked with the accredited PAOs to publish a range of fees, with corresponding line items of the typical types of services/procedures that will be covered. PAOs licensed under HCSA will also be required to submit information on itemised charges for the purposes of updating the range of fees published on the MOH website.
<p>26. In the event of an emergency which involves a first-time patient, how are we able to convey the common charges before accepting the patient?</p>
<ul style="list-style-type: none"> • PAOs would have to inform patient or the patient’s family of the common charges before the service is engaged. • Common charges include (a) base fee, (b) extra service charges (if any), (c) consumables (e.g. oxygen, bandages, drugs, equipment use, continuous monitoring). Patient or the patient’s family members should also be informed of the option of conveyance with or without extra service charges (if any) and be allowed to make a choice unless the extra service charges are required for life-saving measures. • Patient or the patient’s family members should be notified promptly if there are changes to the earlier conveyed charges and the patient or the patient’s family should agree to the revised charges. Informed consent should be taken upon arrival prior to the conveyance of the patient.

Part 6 Regulatory Controls on PAOs and Vehicles

<p>27. What aspects of the EAS and MTS will be inspected under HCSA?</p>
<ul style="list-style-type: none"> • The inspection will be conducted in reference to the EAS and MTS Regulations under HCSA. As such, operators may use that as a guide to prepare their fleet of vehicles for inspection and relevant documents, policies and procedures for review.
<p>28. When and how will inspections/audits be conducted on private ambulance services?</p>
<ul style="list-style-type: none"> • Under HCSA, inspections/audits of PAOs will be conducted to assess compliance to the HCSA regulations. Inspections/audits may be conducted for the following

<p>scenarios: (a) prior to issuance of new EAS/MTS service licences; (b) prior to renewing an existing EAS/MTS service licence; and (c) following notification of changes made to the existing EAS/MTS service licence (e.g. addition of new and/or different types of vehicles, and >50% change in the management of the ambulance company). MOH may also conduct post-licensing or ad-hoc compliance checks on PAOs at any time during the service licence period.</p>
<p>29. What are the disciplinary actions that can be taken on accredited / licensed PAOs for non-compliance?</p>
<ul style="list-style-type: none"> • PAOs who are currently accredited under the VAS and fail to comply with the standards may have their VAS status revoked. They would have to either re-apply to be accredited under VAS again prior to the EAS and MTS regulations coming into force under HCSA or apply for a licence in order to provide EAS and/or MTS services under HCSA. PAOs with VAS status revoked will also be removed from the list of PAOs who has met the requirements for VAS, which is currently published on MOH's website for public reference. To date, one PAO's VAS status has been revoked due to repeated non-compliance to the standards detected from the audits. • Under HCSA, PAOs may have their service licence suspended or revoked, be fined up to \$20,000, and/or be given up to two years' imprisonment for non-compliance.
<p>30. What are the disciplinary actions that can be taken for unlicensed PAOs operating under HCSA?</p>
<ul style="list-style-type: none"> • PAOs who are found to be providing private ambulance services without a valid service licence will be fined up to \$20,000, and/or given up to two years' imprisonment.

Part 7 Miscellaneous

<p>31. What should I do if I wish to import an EAS/MTS vehicle for use in Singapore?</p>
<ul style="list-style-type: none"> • As an operator, you are required to inform Customs and LTA of the intention to import EAS/MTS vehicles. Once the vehicle(s) arrives in Singapore, you must declare the import permit to Customs and apply to MOH for vehicle inspection within three months of the vehicle(s) arriving in Singapore. The vehicle(s) must be retrofitted in accordance with the EAS/MTS Regulations and any other accompanying regulatory requirements under HCSA. Upon successful inspection, each approved vehicle will be issued with a Certificate of Compliance (COC) and you may then proceed to inform Customs and register the vehicle(s) with LTA.
<p>32. Will EAS and MTS vehicles have free parking?</p>
<ul style="list-style-type: none"> • All car parks are managed by private entities. As such, free parking for EAS and MTS vehicles will be at the discretion of the car-park operator.