

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

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

<p>1. [Updated as at 10 Aug 2021] 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 3 Jan 2022. 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. [Updated as at 10 Aug 2021] 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 if they were assessed to still be compliant with the MOH Standards for EAS and MTS (2017) at the point of porting over to HCSA.
<p>3. [Updated as at 10 Aug 2021] 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"> <u>From 1 Jul 2021 – 30 Sep 2021</u>: PAOs who are not on VAS will need to apply for a new EAS/MTS HCSA licence(s) if they wish to continue providing EAS/MTS services from 3 January 2022 onwards. PAOs may wish to email to: elis@moh.gov.sg to inform us of the interest to apply for a new EAS/MTS HCSA licence. For service continuity, PAOs are strongly encouraged to inform us via eLIS <u>by 30 Sep 2021</u> so that the 3 Jan 2022 cut-off may be met. Following the notification via eLIS, we will reach out to arrange for inspection of the vehicles and to review the relevant documents/ protocols. Given that processing time is required to validate documents and conduct inspection of vehicles, PAOs not on VAS and have notified MOH on the interest to apply for a new EAS/MTS HCSA licence after <u>30 Sep 2021</u> may only have the licences issued after 3 Jan 2022. This is on the assumption that the application is complete, and all vehicles are able to meet the EAS/MTS requirements under HCSA. PAOs who have not received HCSA licence(s) by 3 Jan 2022 will need to cease the provision of services until the necessary licence(s) have been obtained. <u>From Oct 2021</u>: PAOs who are not on VAS and have earlier expressed interest to apply for a new EAS/MTS HCSA licence by 30 Sep 2021 will be contacted and invited to apply for the EAS/MTS HCSA licence under the new electronic licensing system, HALP, from <u>Oct 2021</u> onwards. PAOs will be required to pay the applicable licensing fees under HCSA.

<p>4. [Updated as at 10 Aug 2021] 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"> • <u>From Oct 2021</u>: PAOs accredited under the VAS who wish to update existing details (e.g. company name, information on key personnel) and vehicle information (i.e. add or remove vehicles) may do so during the data verification stage from Oct 2021 onwards. Addition of vehicles will similarly be subjected to inspection before the vehicle details are transferred to the service licence under HCSA. PAOs accredited under the VAS will be contacted and invited to perform the data verification under the new electronic licensing system, HALP, from Oct 2021 onwards. • <u>From 3 Jan 2022</u>: Once the service regulation for EAS/MTS under HCSA comes into force from 3 Jan 2022 onwards, any changes to vehicle information (i.e. addition or removal of vehicles) will be subjected to the necessary inspections and applicable licence fees under HCSA. More details on licensing fees under HCSA will be separately released in 2H 2021.
<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 scrapyards; 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 2H 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 3 Jan 2022.

7. **[Updated as at 10 Aug 2021] What are the various types of service licences related to private ambulance services under HCSA?**

- 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. However, the **relevant requirements for an EAS (i.e. crew member requirements, equipment etc.) would still apply even if EAS-equipped ambulances are used to ferry non-emergency patients.**

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?**

- 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.

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 relevant requirements for an EAS (i.e. crew member requirements, equipment etc.) would still apply even if EAS-equipped ambulances are used to ferry non-emergency patients. In addition, 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. [Updated as at 10 Aug 2021] Can I appoint the same person to be the Principal Officer (PO) and Clinical Governance Officer (CGO) (previously referred to as the “Clinical Director” (CD))?</p>
<ul style="list-style-type: none"> • The same person may be appointed as the PO and CGO as long as the person fulfils the requirements of the PO and CGO and is able to take on the associated roles and responsibilities. • While the CD is now renamed as the CGO to align with the terminology used under HCSA in reference to the person responsible for providing such clinical/technical oversight, the nature of this role remains the same.
<p>15. What is the requirement for the CGO 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 CGO. • 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. [Updated as at 10 Aug 2021] For EAS, can specialists of specialties other than Emergency Medicine be appointed as the EAS CGO in my company?</p>
<ul style="list-style-type: none"> • Only Emergency Medicine, Intensive Care, Anaesthesia and General Surgery Specialists accredited by the Specialist Accreditation Board and registered by the Singapore Medical Council may be appointed as an EAS CGO without further review, subject to their meeting other requirements. • Other registered specialists from specialties with significant training and practice in acute and/or life-saving interventions will have their applications reviewed by an MOH-appointed panel.
<p>17. 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 CGO in my company, what should I do?</p>
<ul style="list-style-type: none"> • The provision of EAS services should not continue until a CGO is appointed. The list of approved CGO can be found at: https://www.moh.gov.sg/licensing-and-regulation/regulations-guidelines-and-circulars/details/list-of-approved-clinical-directors-for-private-ambulance-operators. • To seek assistance on CGO-related matters, PAOs can also email to the Unit for Pre-Hospital Emergency Care (UPEC) at: enoch.chan.k@upec.sg.

18. What if I am unable to appoint a Key Appointment Holder that is able to meet the requirements stipulated in the Code of Practice?

- To allow greater flexibility for businesses to meet these clinical qualification/governance requirements, the CGO 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

19. Can the same ambulance service crew be used to account for the staffing number for more than one ambulance?

- 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:
 - a) At least one qualified emergency ambulance driver; and
 - b) At least one crew leader who is an appropriately qualified Ambulance Paramedic, Ambulance Nurse or Ambulance Doctor.

20. Can in-training personnel (i.e. pending certification/qualification) be counted towards the minimum requirement for ambulance service crew?

- 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

21. What are the technical requirements that each ambulance vehicle must meet?

- 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.

22. Is there any vehicular requirement for ambulances under the new regulations?

- 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 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.
23. For PAOs who are already currently on board the VAS, would they still need to be re-inspected prior to the implementation of HCSA?
<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

24. [Updated as at 10 Aug 2021] In the event that an MTS patient deteriorates into an emergency condition, what should the MTS provider do?
<ul style="list-style-type: none"> The MTS crew should check with their CGO to determine whether they should proceed with the conveyance, or to stop the vehicle and focus on instituting the necessary clinical measures while activating SCDF for more advanced clinical support. In making this assessment, the CGO and MTS crew should take into consideration their ability to achieve the best care outcomes for the patient.
25. [Updated as at 10 Aug 2021] How should the licensee determine which hospital to send patients to?
<ul style="list-style-type: none"> PAOs are required to 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 to the nearest public hospital with an A&E department. The requirement applies even if the patient or patient's next-of-kin insist on going to a private hospital; and (b) all other Emergency Patients 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), unless the patient or patient's next-of-kin have given an indication to be ferried to a hospital of their choice. With the exception of the above scenarios for Emergency Patients, PAOs should develop a process to determine what is an appropriate hospital to convey the patient to at any point in time. This should take into account the patient's condition, the specialties which the hospital has, as well as the times when these specialties are available (e.g. whether the specialties in question are available on site at the time when the patient is estimated to arrive at the hospital).

<ul style="list-style-type: none"> To avoid disputes with the patient and/or the patient's next-of-kin over the destination, licensees are encouraged to clarify the above requirements, such as through a disclaimer on their website or as part of the triaging process.
<p>26. [Updated as at 10 Aug 2021] Does HCSA regulate the pricing of private ambulance services?</p>
<ul style="list-style-type: none"> While the HCSA Regulations do not regulate the fees and charges of healthcare services, 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. PAOs are to ensure alignment in their published fees and the actual fees charged to patients in relation to the service(s) provided. To bring about greater price transparency for consumers, MOH has worked with the accredited PAOs to publish a range of fees, with corresponding line items of the typical types of services/procedures. The range of fees is available on MOH website: https://www.moh.gov.sg/licensing-and-regulation/accredited-private-ambulance-operators. 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>27. 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 and prior to actual conveyance?</p>
<ul style="list-style-type: none"> PAOs would have to inform patient or the patient's next-of-kin 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). The patient or the patient's next-of-kin 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. The patient or the patient's next-of-kin should be notified promptly if there are changes to the earlier conveyed charges and the patient or the patient's next-of-kin should agree to the revised charges. Informed consent should be taken upon arrival prior to the conveyance of the patient. As part of the informed consent taking, PAOs should clearly communicate the updated rates associated with the changes in the treatment plan and obtain a signed agreement from the patient or the patient's next-of-kin, to consent to the new charges before proceeding to continue with the provision of service and charge the new rates.

Part 6 Regulatory Controls on PAOs and Vehicles

<p>28. 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>29. 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 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>30. [Updated as at 10 Aug 2021] 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, the VAS status of several PAOs has been revoked due to non-compliances to the standards detected from 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>31. 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>32. 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, the details of the approved vehicle will be included in the HCSA licence and you may then proceed to inform Customs and register the vehicle(s) with LTA.
<p>33. 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.
<p>34. [Updated as at 10 Aug 2021] Are PAOs allowed to loan licensed EAS/MTS vehicles to another licensed PAO?</p>
<ul style="list-style-type: none"> • PAOs, when engaged by clients/patients to provide EAS/MTS, are not allowed to use another PAO's vehicles for the service, as the unique details of each EAS/MTS vehicle is tied to the licence held by the PAOs and the PAOs will be held responsible/accountable for all activities undertaken by the EAS/MTS vehicles under their licence. Under HCSA, it is an offence to operate an ambulance vehicle with a vehicle registration number that is not reflected on the licensed PAO's licence.