

26 June 2023

# STAKEHOLDER CONSULTATION REPORT ON PROPOSED ASSISTED REPRODUCTION SERVICE REQUIREMENTS UNDER THE HEALTHCARE SERVICES ACT (HCSA)

#### SUMMARY OF KEY FEEDBACK AND RESPONSES

Since the enactment of the Healthcare Services Act (HCSA) in 2020, the Ministry of Health (MOH) has been rolling out the HCSA in phases. Phase 1 of the HCSA was implemented on 3 January 2022, while Phase 2 will be implemented on 26 June 2023. Providers who are offering the Assisted Reproduction (AR) service will be impacted by Phase 2 of the HCSA implementation. As such, we have engaged extensively with providers on the proposed AR service requirements that aim to further strengthen patient safety and welfare.

2. From 9 December 2022 to 27 January 2023, MOH sought feedback on the proposed AR service requirements from PHMCA licensed medical clinics and hospitals who were approved to offer assisted reproduction under the Second and Third Schedules of the PHMC Regulations via an online public consultation hosted on <a href="https://www.hcsa.sg">www.hcsa.sg</a>. Of the 26 providers (then) who offered AR, we received 8 feedback via written comments and email enquiries.

### Feedback Received and MOH's Responses

3. There was broad consensus supporting the proposed HCSA AR service requirements. Majority of the feedback gathered from licensees requested for further clarification on the proposed requirements and implementation details. Please refer to Figure 1 for the general breakdown of feedback collected.



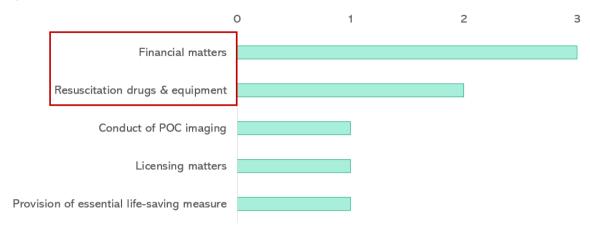








Figure 1. Breakdown of feedback received on the proposed AR service requirements<sup>^</sup>.



^Feedback/Clarifications exclude those on transition-related administrative matters.

4. Of the feedback received, the top 2 areas that licensees were concerned about were on: (i) financial matters and (ii) resuscitation drugs and equipment requirements.

#### I. Financial Matters

5. Stakeholders sought greater clarification on how financial counselling should be conducted, such as whether it was mandatory for patients to fill up specific forms and if there were existing fee benchmarks which patients could refer to for AR treatments and procedures. Furthermore, stakeholders sought clarifications on how MediShield Life and Community Health Assist Scheme (CHAS) would apply to fertility procedures and services. This was in relation to MOH's requirement whereby a provider should inform the patient or caregiver about the status of the licensee's accreditation or participation in a public healthcare financing scheme, such as MediShield Life and CHAS. Licensees will be required to provide financial counselling, and inform patients about fees which may be deducted from a Medisave account and if there are any other applicable subsidies or grants that may apply to their patients. MOH has noted stakeholders' requests to provide further information on financial counselling within the FAQs on www.HCSA.sq.

## II. Resuscitation Drugs and Equipment Requirements

- 6. Licensees noted the list of resuscitation drugs and equipment which should be maintained by an AR service provider. They also sought further elaboration on what "Reversal kit for local anesthetic toxicity" and "Management kit for malignant hyperthermia" should consist of.
- 7. MOH would like to clarify that the reversal kit for local anaesthetic toxicity should minimally consist of 20% Intravenous Lipid Emulsion and Benzodiazepine Injection while the management kit for malignant hyperthermia should minimally consist of

Dantrolene injection. In addition, the kits should contain instructions on the use of these drugs (e.g., dose, dilution), and any other drugs or equipment needed for dilution and administration.

## **Next Steps**

8. In addition to the feedback received above, MOH is reviewing other feedback received on the proposed AR service requirements and will be responding to these queries separately. The finalised requirements and the updated FAQs will be shared with licensees and uploaded on <a href="https://www.HCSA.sg">www.HCSA.sg</a> in due course.

#### Conclusion

- 9. MOH would like to thank all stakeholders who have actively engaged us during our stakeholder consultations. This has allowed us to better understand your concerns and priorities. Together with our stakeholders, we look forward to improving patient safety, welfare and continuity of care across the sector.
- 10. For further clarifications, please write in to hcsa enquiries@moh.gov.sg.

Thank you.

Health Regulation Group Ministry of Health