



MINISTRY OF HEALTH  
SINGAPORE

# **The Healthcare Services Act (HCSA) Outpatient Dental Service Requirements**

Presented by the Health Regulation Group (HRG)  
Ministry of Health  
22 June 2023



# **OVERVIEW OF REQUIREMENTS UNDER HCSA FOR OUTPATIENT DENTAL SERVICES**

# What are the general requirements to fulfill for a HCSA licensee?

- Appoint a suitably qualified **Key Appointment Holder, Principal Officer and Clinical Governance Officer**.
- Seek **MOH's approval for co-location of services** within a licensed premises or conveyance
- Ensure the environment, medical supplies and equipment are safe and suitable; medicinal and health products are used safely, appropriately and correctly
- Collected specimens have clinical utility and are tested by approved clinical laboratories, and are packaged and transported in a safe manner
- Patients are accorded privacy, protected against abuse and neglect, well-informed of their conditions and options for treatment, and health records are accurate, up-to-date and secured
- Prepared to respond to national emergencies
- Establish **business continuity plans** in the event of any disruption to the operation
- **Adhere to the naming restrictions** when selecting a name for the healthcare institution

# What are the general requirements to fulfill for a HCSA licensee?

- All registered healthcare professionals are to maintain **valid BCLS and AED certification when present in a patient-facing clinical area**. For those who are not medically fit to administer BCLS, the BCLS and AED certification in the theory component is still required.
  - As time is needed for registered healthcare professionals to attend the course and obtain valid certification, a sunrise period will be provided and this requirement will only be enforced from 1 Jan 2027.
- All registered medical practitioners and dentists should be **trained in the use of emergency drugs and equipment** listed below. MOH will develop a course to refresh and upskill the competency of medical practitioners and dentists in the use of these drugs and equipment for those who require it.

## Emergency Drugs

- Injection adrenaline
- Injection antihistamine (e.g. promethazine)
- Injection steroid (e.g. hydrocortisone)
- Inhaled bronchodilators

## Emergency Equipment

- Manual resuscitator
- Airways of at least 2 sizes (*if clinics are seeing paediatric & adult patients, to cater 1 size each for adult & paediatric patients respectively*)
- Infusion set
- IV infusion fluid
- Appropriate delivery devices for bronchodilator (e.g. spacer)

# Principles for provision of Outpatient Dental Services in temporary premises

The need to maintain and bring emergency drugs and equipment when providing Outpatient Dental Service via the 'temporary premises' MOSD would be based on these principles:

1. In settings where the dentist **does not have control over** (i) the acuity of patients that will be seen, and (ii) the level of resuscitation and emergency management expected, the **need to maintain and ensure the availability of emergency drugs and equipment would be mandatory**.
  - E.g., sites which accept walk-in patients, dental screening events at community centres or workplaces.
2. In settings where the dentist **knows** (i) the acuity of their patient, and (ii) the level of resuscitation and emergency management expected because he or she has seen the patient and has professionally assessed the patient before, the need to bring emergency drugs or equipment would be **dependent on the professional judgement** of the dentist.
  - E.g., home visits for patients without any dental procedures performed during the visit.

# What are the specific requirements to provide Outpatient Dental Services in temporary premises?

## Recap:

- *'Temporary premises' is one of the four Modes of Service Delivery (MOSDs).*
  - *It refers to the provision of Outpatient Dental Service from place to place.*
  - *Examples include dental house calls or ad-hoc dental screenings.*
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- A licensee must ensure that the Outpatient Dental Service in temporary premises is provided in a **proper, effective and safe manner, with adequate privacy if necessary.**
  - In order to achieve this, a licensee must:
    - a) establish and implement guidelines** to assist the dentist attending to the patient to take into account:
      - i. the patient's medical condition or history; and
      - ii. the dentist's training and scope of practice; and
      - iii. the facilities, equipment and resources available at the temporary premises
    - b) inform** the patient or the caregiver on **any follow-up care and treatment**, including how the patient may obtain follow-up care and treatment
    - c) ensure that the patient or caregiver is **provided with alternative arrangements** for the patient to receive dental care if the dentist deems that the patient or a particular treatment cannot be managed at the temporary premises in a proper, effective and safe manner
    - d) ensure every personnel who attends to a patient must **provide the patient with proof of the personnel's identity, role or designation**

# What are the general requirements for the conduct of dental radiography procedures (e.g., dental X-ray, dental CBCT)?

A licensee must ensure that the radiography procedure is **necessary** for the patient, and is conducted in a **proper, effective and safe manner**. In order to achieve this, a licensee must ensure that:

- a) the radiography procedure is conducted on the correct patient.
- b) establish and implement protocols, while the patient is undergoing the radiography procedure, to
  - i. minimise the patient's exposure to radiation or repeated imaging; and
  - ii. protect others against exposure to radiation.
- c) appropriate measures have been taken if the patient is  $\leq 12$  years old.
- d) The patient or caregiver is notified and arrangements are made for follow-up check or treatment if any findings of the radiography procedure indicates that further investigation would be necessary.
- e) ensure that all findings obtained are recorded in the patient's health record
  - i. if the dental CBCT is repeated, to keep and maintain proper and accurate records of the reason for the repeat

# What are the specific requirements to provide Dental CBCT?

## Recap:

- *Dental CBCT is a Specified Service allowable under the Outpatient Dental Service.*
- *It can be offered via the following Modes of Service Delivery (MOSDs): “Permanent premises” and “Conveyances”.*
- *MOH’s approval is required before Dental CBCT can be provided.*

The licensee must ensure that:

- a) the dental CBCT is conducted\* by a qualified person, who is either a dentist, an oral health therapist, radiologist or radiographer.
- b) the dentist who uses CBCT has obtained a Certificate of Competency (COC) from SDC
  - In developing the COC, SDC will also review the framework for the granting of the COC, including any grandfathering of existing providers though this would be dependent on proof of formal training.
  - There will be a sunrise period for the implementation of the COC and SDC will provide an update when ready.
- c) dental CBCT is conducted **after** the following conditions have been satisfied:
  - i. a dentist has assessed that the use of conventional radiography would not be sufficient
  - ii. a dentist has assessed that the potential benefits of conducting dental CBCT outweighs the potential risks
  - iii. if a second or subsequent dental CBCT is to be conducted on the patient, consideration has been given to whether it may be conducted on a different part of the patient’s teeth, jaws or associated structures to minimise exposure to radiation;
- d) keep and maintain proper and accurate records of the conditions mentioned in (c).
- e) the field of view for each dental CBCT is collimated to the area of clinical interest.

*\*NEA licences govern the operation of the equipment but does not govern the use of CBCT in clinical practice.*



# What are the requirements to make referrals for dental radiography procedures?

A licensee taking referrals for dental X-ray or CBCT should –

- a) **Only take referrals from another Outpatient Dental Service.** The Outpatient Dental Service should not take referrals from other licensable healthcare services such as Outpatient Medical Service. If the Outpatient Dental Service intends to take CBCT images for Outpatient Medical Service licensees, the Outpatient Dental Service should also hold a HCSA Radiological Service licence.
- b) Maintain records of:
  - i. The referring Outpatient Dental Service
  - ii. The dentist who prescribed the dental X-ray or CBCT

# How do you ensure price transparency as a HCSA licensee?

**[NEW]** Issue a bill of the fees charged for every Licensable Healthcare Service provided to the patient, even if the patient has zero out-of-pocket (OOP) payment due to third party payors or government subsidies, unless the patient declines.

**[NEW]** Inform the patient about the status of your accreditation or participation in a public scheme where applicable, such as approval for Medisave withdrawal, MediShield Life Scheme Act, or accreditation as a CHAS clinic

Display or make available the charges that are applicable for your service, including:

1. Consultation fee applicable to the patient, AND
2. Any administrative fee or other charges imposed on the patient (e.g., investigations, treatments, procedures and medications).

You must also inform the patient, at their request, of the estimated applicable charges, including administrative charges, for any aspect of your service.

# What is financial counselling? When is it done?

- Before a licensee provides a **category of treatment or procedure that is eligible for MediShield Life coverage or a treatment or procedure that is MediSave claimable\***, the licensee must, as soon as reasonably practicable, **conduct financial counselling** to the patient or the patient's authorised representative on the fees chargeable for the treatment or procedure if the fee information is new to the patient.
- Financial counselling must include giving the patient or the patient's authorised representative all of the following information:
  - a) an **estimated price or price range** for the treatment of the patient's condition or the procedure that the patient undergoes or intends to undergo;
  - b) the **MOH fee benchmark published** (if available) for the same or similar treatment or procedure<sup>^</sup>;
  - c) the applicable MediShield Life benefits (e.g., deductible, co-insurance, claim limits), and MediSave withdrawal limits for the treatment or procedure.
- A licensee must document all financial counselling that is conducted for any patient as part of the patient's health records, and obtain the acknowledgement of the patient or the patient's authorised representative upon the completion of the financial counselling. Record of acknowledgement by the patient in any form would be accepted.

*\*Today, there are no MediShield Life claimable dental procedures. MediSave claimable dental procedures are those which could be found in the Table of Surgical Procedures published by MOH [https://www.moh.gov.sg/docs/librariesprovider5/medisave/table-of-surgical-procedures-\(1-feb-2021\).pdf](https://www.moh.gov.sg/docs/librariesprovider5/medisave/table-of-surgical-procedures-(1-feb-2021).pdf).*

*^Today, there are no fee benchmarks published for dental procedures.*

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# The End

# Thank you

