



MINISTRY OF HEALTH
SINGAPORE

26 June 2023

**STAKEHOLDER CONSULTATION REPORT ON
PROPOSED NUCLEAR MEDICINE 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. Nuclear Medicine Service providers will be impacted by Phase 2 of the HCSA implementation. As such, we have engaged extensively with providers on the proposed HCSA Nuclear Medicine Service requirements that aim to further strengthen patient safety and welfare.

2. From 27 January to 24 February 2023, MOH sought feedback on the proposed Nuclear Medicine Service requirements from the Nuclear Medicine community¹ via an online public consultation hosted on www.hcsa.sg. In all, we received feedback from 6 out of 19 nuclear medicine providers via written comments and email enquiries.

Feedback Received and MOH's Responses

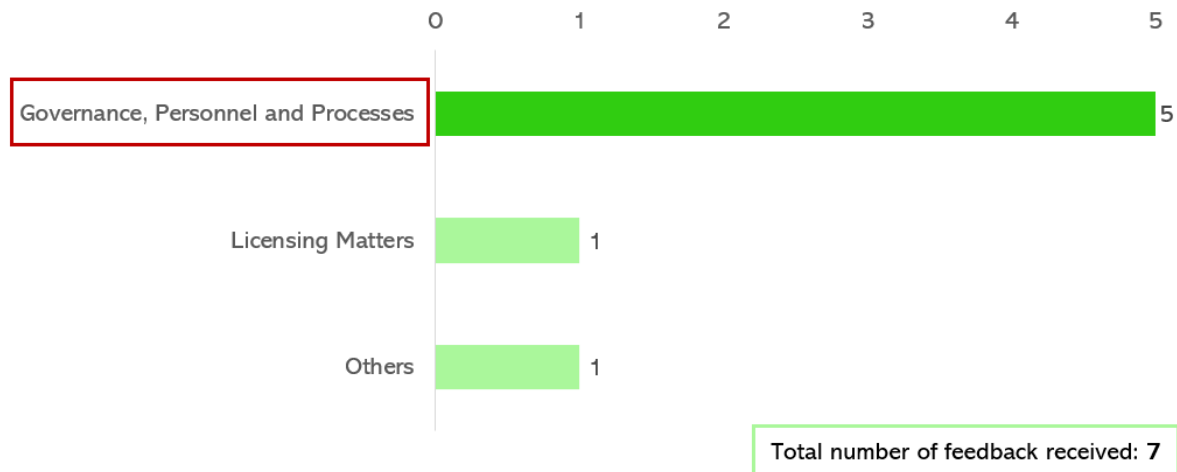
3. Stakeholders were generally supportive of the proposed HCSA Nuclear Medicine Service requirements. Majority of the feedback gathered from licensees requested for further clarification on the proposed requirements and implementation details. Please refer to [Figure 1](#) for the breakdown of feedback collected.

¹ This includes licensees currently providing Nuclear Medicine Services under both the Private Hospitals and Medical Clinics Act and the HCSA, as well as locally registered Nuclear Medicine Physicians.



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Figure 1. Breakdown of feedback received on the proposed Nuclear Medicine Service requirements



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

**Others include clarification on whether references and terminology in the Nuclear Medicine Service Regulations would be updated to be aligned with the recently updated Radiation Protection (Ionising Radiation) Regulations 2023.*

4. Of the feedback received, the top area that licensees were concerned about were on Governance, Personnel & Processes.

I. Governance, Personnel & Processes

5. Stakeholders generally agreed with the proposed regulatory requirements on governance, personnel & processes, but some requested for further clarity on benchmarks or standards regarding identification of key performance indicators for assessing performance outcomes. Others requested for alignment of terminology between the Nuclear Medicine Service Regulations (NMSR) and the recently updated Radiation Protection (Ionising Radiation) Regulations (RPIRR) e.g., “medical physicist” instead of “radiation physicist”.

6. MOH has reviewed the feedback and has reached out to the relevant stakeholders to clarify specific queries on the proposed regulations. The NMSR have also been updated to align with the RPIRR where relevant –

- i. “medical physicist” is now used in the NMSR to reflect the terminology used in the RPIRR as well as by licensees; and
- ii. requirements relating to NEA licences have also been updated (e.g. CGO to hold a NEA L6 licence) to reflect the new licensing framework under the RPIRR.

Next Steps

7. In addition to the feedback received above, MOH is also reviewing other feedback received and will publish a set of Frequently Asked Questions (FAQs) to address majority of the feedback. The finalized requirements and the FAQs will be shared with licensees and uploaded on www.hcsa.sg in due course.

Conclusion

8. MOH would like to thank all stakeholders who have actively engaged with 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.

9. For further clarifications, please write in to hcsa_enquiries@moh.gov.sg.

Thank you.

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