

HIGHLIGHTS

From the Honorary Secretary

Report by Clinical Asst
Prof Benny Loo Kai Guo

Dr Loo is a paediatrician in public service with special interest in sport and exercise medicine. He serves to see the smiles on every child and athlete, and he looks forward to the company of his wife and children at the end of every day.



Meeting with MOH on HIB and NEHR

On 31 January 2024, SMA Council members met with Ministry of Health (MOH) officers to discuss the draft Health Information Bill (HIB). The MOH representatives were led by Deputy Director-General of Health (Health Regulation), Adj A/Prof Raymond Chua. SMA representatives were led by Dr Ng Chee Kwan, SMA President.

SMA had earlier submitted feedback to the Minister for Health highlighting concerns regarding the HIB, which will make it mandatory for all licensed healthcare providers to contribute data to the National Electronic Health Record (NEHR). We thank Minister Ong Ye Kung for his thoughtful response.

Details of MOH's public consultation can be found at this link: <https://bit.ly/3STP20F>.

In our feedback to MOH, we recommended the following:

1. NEHR implementation should protect patient autonomy, privacy and confidentiality. Patients should be allowed to opt out of uploading their health information and should be able to control the information that is presented to their doctors.
2. The process of opting out should be made widely available.
3. Licensed healthcare providers should not be required to contribute the health information of patients who are not resident in Singapore.
4. Mandatory contribution should be deferred for an appropriate period of time in order for licensed healthcare providers to prepare themselves for the necessary requirements.
5. The health information to be contributed to NEHR should be limited to the essentials required for a healthcare provider to provide immediate care.
6. Medico-legal protection should be provided for licensed healthcare providers who contribute to NEHR.
7. The costs of implementation that will be incurred by licensed healthcare providers would need to be funded.

SMA strongly believes that NEHR access arrangements should include "giving extra protection for sensitive health

information and enabling patients to restrict access to their NEHR" (as stated in Minister Ong's reply to SMA on 26 December 2023).

After the discussions, SMA was informed of the following approach by MOH:

1. Limit the contributions to NEHR to key medical information only (such as diagnosis, drug allergy, prescriptions, and laboratory and radiological test results) and not require the contributing of the entire set of information in the electronic medical record (EMR) (although this will be shared between public healthcare institutions who use the same EMR systems since they are all part of the public healthcare system);
2. Not to require mandatory NEHR contribution by short-term visit pass holders;
3. Access logs are provided to patients via their HealthHub to check their NEHR access history and to report to MOH if there is any suspicious or unauthorised access;
4. Provide patients the option to restrict access to their NEHR by all licensed healthcare providers even for care purposes, while giving clinicians authority to "break the glass" in a medical emergency;
5. Provide extra protection for sensitive health information in the form of a double log-in within NEHR; and
6. Provide appropriate support packages to healthcare providers to digitalise their systems and workflows to meet the mandatory contribution requirement. More details will be made known in the coming months.

A survey will be rolled out in the coming months by MOH to determine the readiness of licensed healthcare providers to meet the mandatory contribution requirements to NEHR as well as cyber and data security requirements. This will help to determine the readiness and timelines for operationalisation of the HIB, such that the providers will have adequate time to meet the requirements of the HIB.

A draft "Guidelines on the Appropriate Use and Access to NEHR" has been developed by MOH, and the workgroup includes experts in medical ethics, including representatives from the SMA Centre for Medical Ethics and Professionalism.

SMA looks forward to more dialogue and will continue to work closely with MOH in the future, to enable a smooth transition for our healthcare providers to meet the requirements of the HIB. ♦