



MINISTRY OF HEALTH
SINGAPORE

MH 78:44/1

MOH Circular No. 13/2025

21 March 2025

All Outpatient Medical and Dental Service Licensees under Healthcare Services Act (HCSA)

CLARIFICATIONS ON THE IMPLEMENTATION SUPPORT MEASURES FOR THE PROPOSED HEALTH INFORMATION BILL

Following recent engagements on the proposed Health Information Bill (HIB), we understand that there are concerns amongst outpatient medical service licensees. We gathered that there are three main concerns. First, the licensees' ability to meet the Cyber and Data Security (CSDS) requirements. Second, potential legal liabilities that licensees may be subjected to should there be a cyber or data breach. Third, the cost of cyber and data security measures.

2 We want to assure you that they can be addressed. We are confident of this because we have likewise worked with Healthier SG primary care clinics to implement similar measures, and it has worked for them. While there are some new aspects arising from HIB such as data security requirements and concerns on legal liabilities, these can be addressed.

Meeting CSDS Requirements

3 To support licensees in meeting the CSDS requirements, MOH has introduced the [Cyber and Data Security Guidebook](#), which offers practical guidance and examples to help licensees understand and meet the CSDS requirements. We will be providing more resources and educational materials, such as templates and infographics, on this. We will also be rolling out a self-assessment tool, guides, and also training programmes.

4 Under Healthier SG, MOH published a list of Healthier SG-compatible Clinic Management System (CMS) which are capable of contributing data to the National Electronic Health Record (NEHR), adheres to data portability requirements, and are compliant to cyber security requirements. Likewise, MOH will **publish a whitelist of NEHR-compatible CMS systems** that meet both the NEHR connection and CSDS security requirements, and licensees will be able to select from this whitelist to meet HIB requirements and contribute to NEHR.

Mitigating Legal liability

5 MOH's published whitelist of CMS and Electronic Medical Record (EMR) vendors will also address the concerns on legal liability, as they have all demonstrated that their systems comply with the prescribed requirements. Hence, under the proposed HIB, if licensees have exercised due diligence in choosing a white-listed CMS/EMR system, they will not be held accountable for lapses or cybersecurity non-compliance arising solely from these CMS/EMR solutions.

6 That said, licensees will still need to ensure that their clinic processes and staff are able to meet the CSDS requirements. For instance, licensees will need to put in place an up-to-date basic incident response plan and ensure that staff are familiar with basic cyber practices, such as the prevention of phishing and good password management. These are essential hygiene practices that most clinics should already have in place.

7 The law will not be written in a way to always result in licensees being held liable. In the event of any data or cybersecurity incidents, the circumstances surrounding the incident are salient. If the licensee has exercised due diligence in using the right CMS/EMR system and maintaining appropriate data and cybersecurity practices, they will not be held liable.

Addressing Cost of Measures

8 MOH is also working on a support package to help licensees with their HIB onboarding costs, to comply with the new HIB requirements.

9 With the CSDS resources, tools and materials mentioned in Paragraph 3, it is envisaged that vast majority of our licensees will be able to meet the HIB CSDS requirements. Hence, the need to engage any professional services, including retainer services, to help licensees meet the CSDS requirements, is entirely optional. If licensees want to do so, they can select from a curated list of qualified service providers (<https://www.healthinfo.gov.sg/implementation-support/>).

10 To help licensees with the costs of such professional services, MOH will provide a support package to help defray the one-time cost of doing so. Subsequently, licensees should consider business needs and costs to determine if the retainer services are necessary. This support package will also cover costs associated with contribution to the NEHR and adoption of a NEHR-compatible CMS system under the HIB.

11 We would like to reassure licensees that adequate time will be provided for you to meet and comply with HIB requirements. Further details on the timelines to meet HIB compliance will be announced at the end of 2025, following the passing of the Bill. In the meantime, we remain committed to partnering and supporting you through this transition while ensuring the security and integrity of our health information systems and data.

12 Please visit our website at www.healthinfo.gov.sg for more information on the HIB. Should you require any further information or clarification, please email us at HIA_Enquiries@moh.gov.sg.



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