



MINISTRY OF HEALTH
SINGAPORE



MH 78:44/1

MOH Circular No. 60/2024

19 August 2024

All Healthcare Services Act Licensees
Registered Medical Practitioners

ISSUANCE OF MEDICAL CERTIFICATES FOLLOWING THE PROVISION OF OUTPATIENT MEDICAL SERVICE

We refer to the following circular and press release which were previously sent to registered medical practitioners and Healthcare Services Act licensees:

- a) MOH Circular 30/2024 titled “*Issuance of Medical Certificates Following the Provision of Outpatient Medical Service*” on 22 April 2024 (**Annex A**) which reminds (i) all registered medical practitioners of the obligations relating to the issuance of medical certificates (“**MCs**”) found in the Singapore Medical Council Ethical Code and Ethical Guidelines 2016 Edition (“**SMC ECEG 2016**”), and (ii) all Outpatient Medical Service (“**OMS**”) licensees of their obligations under the Healthcare Services Act (“**HCSA**”) for the provision of OMS via remote mode of service delivery; and
- b) MOH Press Release on 16 August 2024 on “*MaNaDr Clinic Instructed to Stop Provision of Outpatient Medical Services via Teleconsultation*” (**Annex B**).

Findings on the Issuance of Medical Certificates

2. Following the issuance of MOH Circular 30/2024, the Ministry has found an OMS licensee with poor adherence to the requirements stipulated in the Circular, particularly in the context of the remote provision of OMS i.e., teleconsultations. The findings revealed:

- a) Short Teleconsultation Duration. A very large number of cases seen by MaNaDr Clinic involved very short teleconsultations. For example, in a sampled month, more than 100,000 teleconsultations involved video calls with patients of one minute or less in duration, with the shortest being 1 second. Such short consultations raise concerns about the safety and quality of clinical care provided to patients.

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- b) Multiple Issuance of MCs. Following these very short teleconsultations, some patients were issued with multiple MCs over a short period of time, typically within a month. For example, in a sampled month, more than 1,500 patients were issued with MCs on 5 or more occasions, with the highest number of MCs issued to a single patient in a month being 19.
- c) Questionable and Poor Documentation. While the duration of these teleconsultations was short, some of the corresponding case notes contained detailed information that did not appear to be commensurate with the duration of teleconsultation. At the same time, in other instances the case notes were extremely sparse or brief, potentially compromising the continuity of patient care.

Reminder on MOH Circular 30/2024 on the Issuance of Medical Certificates Following the Provision of Outpatient Medical Service

3. In MOH Circular 30/2024, the Ministry and SMC reminded medical practitioners on the guidance in the SMC ECEG 2016 that the issuance of MCs is underscored by an existing patient-doctor relationship and the duty of care owed to the patient. The SMC ECEG states that “*Medical certificates must be issued to patients only on proper medical grounds arrived at through good clinical assessment*” and must not be influenced by extraneous considerations. **Medical practitioners are responsible for ensuring that MCs issued to patients are justified on proper medical grounds and that the decision to do so had been arrived at through good clinical assessment.** Additionally, the Circular highlighted the medico-legal implications of MCs and the necessity for doctors to personally sign the MCs at the time of consultation, accompanied by their name and Medical Council Registration (MCR) number for accountability and verification purposes. Furthermore, it advises that telemedicine consultations should strive to provide the same quality and standard of care as in-person medical care, and if the doctor is not satisfied with the standard of care through telemedicine, a physical in-person consultation should be arranged.

4. MOH Circular 30/2024 also reminded OMS licensees on the need to comply with the Healthcare Services Regulations, including the Healthcare Services (General) Regulations, the Healthcare Services (OMS) Regulations, and the Licence Conditions (“**LCs**”) For Remote Provision of Outpatient Medical Service. In particular, real-time, two-way interactive audio-visual communications (e.g., video consultation) must be utilised when tele-consulting with new patients¹. MCs should not be issued via

¹**Healthcare Services (OMS) Regulations 2023**

Restriction on remote provision

R30.—(1) Subject to paragraph (2), a licensee must not provide an outpatient medical service by remote provision to a first-time patient.

(2) Despite paragraph (1), a licensee may provide an outpatient medical service by remote provision to a first-time patient if —

(a) the outpatient medical service is provided through real-time 2-way interactive audiovisual communications; or

teleconsultations to new patients solely based on the patients' requests without proper assessment by a medical practitioner to determine if the issuance of the MCs is warranted. Additionally, if an assessment of a patient cannot be conducted remotely (e.g., the patient requires a physical examination), medical practitioners should make alternative arrangements for the patient to receive the necessary care² e.g., advise the patient to seek an in-person consultation with a medical practitioner. Patients should undergo a physical review if additional assessment is required before the issuance of MCs.

Reminder on the Obligations under HCSA and SMC ECEG 2016

5. The Ministry and SMC would like to remind:

- a) HCSA OMS licensees on the need to comply with the HCSA, the Healthcare Services (General) Regulations, the Healthcare Services (OMS) Regulations and any other applicable LCs in ensuring that the OMS is provided safely and effectively to all patients; and
- b) Registered medical practitioners of the need to comply with the provisions in the SMC ECEG 2016 on the issuance of MCs and practice of telemedicine.

6. A breach of the Healthcare Services (General) Regulations, Healthcare Services (OMS) Regulations and LCs may result in regulatory actions being taken, including but not limited to:

- a) suspension or revocation of the OMS licensee's licence;
- b) shortening the term of the OMS licensee's licence;
- c) a direction requiring the OMS licensee to rectify the contravention, or prevent a recurrence of the contravention; and/or
- d) a direction requiring the OMS licensee to pay a financial penalty.

(b) the outpatient medical service is provided in response to an emergency or a disaster, including but not limited to, prescribing any empiric or prophylactic treatment to prevent or control an infectious disease outbreak.

(3) In this regulation, "first-time patient", in relation to a licensee, means a patient who has not received an outpatient medical service from the licensee.

²Healthcare Services (OMS) Regulations 2023

Requirements for remote provision

R29.—(1) This regulation applies to a licensee who is approved to provide an outpatient medical service by remote provision.

(2) A licensee must —

(e) if a medical practitioner who is the licensee's personnel is of the opinion that a patient requires a particular medical treatment or care or a physical examination which cannot be carried out by remote provision, make alternative arrangements for the patient to receive the medical treatment or care or physical examination and inform the patient or (if the patient is a minor or lacks mental capacity) a next-of-kin or carer of the patient of the alternative arrangements.

7. The Ministry may conduct inspections, audits or request for any relevant documents, including procedures and policies with regard to the remote provision of OMS.

8. Registered medical practitioners who are found to have failed to adhere to the SMC ECEG 2016 may also be referred to SMC for disciplinary action.

9. Should you require any further information or clarification, please email us at HCSA_Enquiries@moh.gov.sg.



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DIRECTOR-GENERAL OF HEALTH
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PROFESSOR CHEE YAM CHENG
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ANNEX A

MOH Circular 30/2024: Issuance of Medical Certificates Following the Provision of Outpatient Medical Service



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ANNEX B

MOH Press Release: MaNaDr Clinic Instructed to Stop Provision of Outpatient Medical Services via Teleconsultation



Press Release -
MaNaDr Clinic Instru