



MINISTRY OF HEALTH  
SINGAPORE

MH 78:44/1

MOH Circular No. 68/2023

20 September 2023

All Public and Private Healthcare Institutions' Chief Executive Officers, Chief Operating Officers, Chairman Medical Boards  
All Registered Medical Practitioners  
All Healthcare Services Act (HCSA) licensees

## CONDUCT OF DISABILITY ASSESSMENTS BY DOCTORS UNDER THE HEALTHCARE SERVICES ACT (HCSA)

The Ministry of Health (MOH) implemented Phase 2 of the Healthcare Services Act (HCSA) on 26 June 2023 (see enclosed). The HCSA marks a shift from a premises-based licensing approach to a services-based licensing approach. Under HCSA, MOH will regulate the provision of healthcare services by doctors delivered through different modes such as house calls and tele-consultations under the HCSA Outpatient Medical Service licence. With this change, disability assessments performed by doctors will fall within the definition of Outpatient Medical Service.

2. In order for you to continue performing Functional Assessment Report (FAR) assessments<sup>1</sup> in person, you or your organisation are to take the following steps, where applicable:

- i. If you have been performing in-clinic disability assessments and wish to continue doing so, you or your organisation must hold a valid HCSA licence for **Outpatient Medical Service with approval for the permanent premises mode of service delivery**.
- ii. If you have been performing disability assessments through house calls ("housecall assessments"), and wish to continue doing so, you or your organisation must hold a valid HCSA licence for **Outpatient Medical Service with approval for the temporary premises mode of service delivery**.
- iii. If you have been performing in-clinic and housecall assessments and wish to continue doing so, you or your organisation must hold a valid HCSA licence for **Outpatient Medical Service with approval for both**

---

<sup>1</sup> Only doctors who are under full or conditional registration with the Singapore Medical Council can perform FAR.



Ministry of Health, Singapore  
College of Medicine Building  
16 College Road  
Singapore 169854  
TEL (65) 6325 9220  
FAX (65) 6224 1677  
WEB [www.moh.gov.sg](http://www.moh.gov.sg)

**permanent premises and temporary premises modes of service delivery.**

For avoidance of doubt, MOH's current policy is that disability assessment can only be performed in person.

3. If you or your organisation does not currently hold a valid relevant licence under the HCSA, you will no longer be able to perform any FAR assessment with immediate effect.

4. Please note that this also applies to the conduct of other disability assessments (e.g. severe disability assessments) that you or your organisation may be offering.

Follow-up Actions Required for assessors / organisations without valid relevant HCSA licences

5. Please be advised that you should not accept any appointments with immediate effect. If you have disability assessments that have been completed and are pending submission via eFASS, you will need to submit them by 22 September 2023.

Information on Licensing Requirements and Clarifications

6. Should you wish to continue conducting FAR assessments, please visit the website at [www.HCSA.sg](http://www.HCSA.sg) for more information on how to be licensed under the HCSA. You may also email [HCSA.Enquiries@moh.gov.sg](mailto:HCSA.Enquiries@moh.gov.sg) to seek further clarification on the new regulation. We have also attached a list of FAQs below for your reference.



ADJ A/PROF RAYMOND CHUA  
DEPUTY DIRECTOR-GENERAL OF HEALTH  
HEALTH REGULATION GROUP  
MINISTRY OF HEALTH

## Frequently Asked Questions

### **Q1: What is the Healthcare Services Act (HCSA)?**

A: The Healthcare Services Act (HCSA) was enacted in January 2020 to gradually replace the Private Hospitals and Medical Clinics Act (PHMCA). The Act safeguards patient safety and well-being and strengthens the governance over healthcare service providers in the evolving healthcare landscape, while enabling the roll out of new and innovative healthcare services. The Regulations under the Act are being implemented in phases, with Phase 1 implemented in January 2022 and Phase 2 on 26 June 2023. Healthcare service providers who provide any Licensable Healthcare Services under the HCSA, including the Outpatient Medical Service (OMS), are legally required to hold a HCSA licence.

### **Q2: Why are doctors who conduct disability assessments required to hold a HCSA OMS licence?**

A: The HCSA is gradually replacing PHMCA, and reflects a shift from a premises-based licensing approach to a services-based licensing approach. Under this new regulatory framework, the provision of non-premises-based services by doctors such as house calls and teleconsultations in the outpatient setting must be licensed under the HCSA OMS. Disability assessments by medical practitioners (doctors) fall within the definition of OMS as it entails the examination of a person's body and mind. Hence, a HCSA OMS licence is required.

“Outpatient medical service” means any of the following healthcare services that is provided to an outpatient:

- a. the examination of the outpatient's body or mind;
- b. the assessment of the outpatient's health;
- c. the observation and diagnosis of, and intervention in, the outpatient's health condition;
- d. the treatment of the outpatient for any condition, disability, disease, disorder or injury;
- e. the provision of medical care to the outpatient;
- f. the performance of either of the following which changes, or is intended to change, the outpatient's appearance or anatomy:
  - i. a clinical procedure;
  - ii. an invasive procedure that penetrates beyond the epidermis layer of the outpatient's skin;
- g. any other healthcare service that is incidental to the provision of a healthcare service mentioned in paragraphs (a) to (f), including —
  - i. the conduct of any simple in vitro diagnostic test on the outpatient; and
  - ii. the conduct of any ultrasound imaging on the outpatient.

### **Q3: What are the relevant HCSA licences required for doctors to continue performing disability assessments?**

A: As the conduct of disability assessment entails the examination of a person's body and mind, it would fall within the scope of the OMS licence if such assessments are done in the outpatient setting. Medical practitioners (doctors) performing disability assessments in the outpatient setting are thus required to hold an OMS licence.

As for the applicable modes of service delivery (MOSD), medical practitioners (doctors) are to assess how the disability assessment is to be provided, and apply accordingly for their licence:

- i. Permanent premises (e.g., brick-and-mortar premises such as GP clinics)
- ii. Temporary premises; no permanent premises (e.g., treating patients at home (home medical, house calls))

Medical practitioners (doctors) can apply for one or more of the relevant MOSDs under their OMS licence.

Disability assessments done in an inpatient setting will fall under the relevant inpatient licensable healthcare services (e.g., Acute Hospital Service, Community Hospital Service).

**Q4: Why are disability assessments by medical practitioners (doctors) considered a licensable healthcare service under the HCSA, but nurses, occupational therapists and physiotherapists who perform the same disability assessments are not subject to HCSA requirements and are allowed to continue performing disability assessments without a HCSA licence?**

**Can doctors not be subjected to HCSA regulations for disability assessments, but instead only be subjected to their professional regulations?**

A: Doctors, by virtue of their training, practice and registration, can provide a wide range of healthcare services, from assessment to diagnosis and treatment. This full spectrum of services provided by doctors are regulated by the Outpatient Medical Service licence under HCSA. Considering the provision of holistic care to patients, a doctor will generally provide any provision of further care and management to the patients on top of any disability assessment provided. Hence, it may not be suitable for this continuum of care to be divided.

On the other hand, nurses, occupational therapists and physiotherapists perform a more restricted scope of practice in accordance with their respective professional regulations.

Assessors who require assistance to apply for the HCSA licence may email [HCSA\\_Enquiries@moh.gov.sg](mailto:HCSA_Enquiries@moh.gov.sg).

**Q5: Do these HCSA licensing requirements apply to nurses, occupational therapists and physiotherapists? Are there plans to extend the requirements to them in the future?**

A: Today, we allow disability assessments to be conducted not only by doctors, but also by nurses, occupational therapists, and physiotherapists. This is to increase convenience for patients, who may interact with different healthcare professionals in different parts of their care journey.

Doctors, nurses, occupational therapists, and physiotherapists need to have a professional license and be regulated under their professional acts to perform disability assessments. For those performing severe disability assessments, they also need to be accredited under the CareShield Life and Long-Term Care Act for a more consistent approach for severe disability assessments given the higher quantum of payouts that these assessments unlock.

MOH had taken a risk-based approach to regulate doctor-led services first in Phase 2 of HCSA. Thus, there will be additional requirements for doctors conducting disability assessments, as part of the fuller range of medical services, including diagnosis and medical management, that they provide to patients which are regulated under HCSA.

MOH will be reviewing the need to license the other healthcare professionals in future phases of HCSA implementation. Before the review is completed, there will not be additional HCSA requirements for the other healthcare professionals performing disability assessments independently within their scope of practice.