

23 October 2006

Dear SMA Member

SMA ADVISORY ON CLINIC MANAGEMENT SYSTEMS (CMS)

Further to the previous advisories on Clinic Management Systems (CMS) emailed on 4 September 2006 and 23 September 2006, SMA has since been in active discussions with MOH. Arising from these discussions, SMA would like to highlight the following information that you may wish to take note of:

1. We reiterate that Singapore law does not prohibit storage of medical records off-site in electronic form. (Reference: The Private Hospitals and Medical Clinics Regulations 2002 [Revised Edition] Section 12, and the Electronic Transactions Act)
2. ALL non-web-based CMS systems at present, cannot help GPs make Medisave claims through CPF's central Mediclaim system. Examples of non-web-based systems currently on the market include Clinic Assist, Clinic Management Software 7.0, Gloco CMS, Medi200, and others.

With regard to the two web-based CMS vendors that MOH has discussed with IDA about the issue of data protection:

- a) We understand from MOH that the two vendors are in-principle agreeable to review their subscriber contracts and make certain changes, which may be applied to existing and future subscriptions so as to enhance the protection of patients, doctors and healthcare institutions;
- b) The subscribers (e.g. the GPs) actually own the medical data they upload;
- c) MOH has confirmed with IDA that the two vendors have the following features to keep the medical data secure in place: data encryption, enterprise level firewall and anti-virus software which reduce the possibility of virus attacks and hacking of patient data through the network. In addition, vendor access for maintenance and troubleshooting purposes are made available only with authorisation by subscribers. On the issue of continuity of data access, there are also business continuity solutions in place to ensure that patient data would always be available to the subscribers offline.

With reference to paragraph 3(c), SMA advises Members to check if such features are similarly available in other web-based CMS solutions.

- Singapore Medical Association