

Frequently Asked Questions

(Version 1.0 dated 2 April 2007)

1. Why is there a need to withdraw the SMA GOF?

SMA had received legal advice that the GOF may be in contravention of Section 34(2)(a) of the Competition Act.

Section 34(1): Subject to section 35, agreements between undertakings, decisions by associations of undertakings or concerted practices which have as their object or effect the prevention, restriction or distortion of competition within Singapore are prohibited unless they are exempt in accordance with the provisions of this Part.

(2): For the purposes of subsection (1), agreements, decisions or concerted practices may, in particular, have the object or effect of preventing, restricting or distorting competition within Singapore if they – (a) directly or indirectly fix purchase or selling prices or any other trading conditions; (b) limit or control production, markets, technical development or investment; (c) share markets or sources of supply; (d) apply dissimilar conditions to equivalent transactions with other trading parties, thereby placing them at a competitive disadvantage; or (e) make the conclusion of contracts subject to acceptance by the other parties of supplementary obligations which, by their nature or according to commercial usage, have no connection with the subject of such contracts.

2. Can I still use the SMA tent card?

No. You should create your own equivalent of the tent card which is visible and easy to use.

3. Is there still a requirement to give financial counselling?

MOH previously issued the “Guidelines on Financial Counselling by Hospitals” under Regulation 11 of the Private Hospitals and Medical Clinics Regulations to all government, restructured and private hospitals. This requires all private hospitals (other than maternity homes or nursing homes) to provide financial counselling to their patients, so as to allow the patient and family to make a proper informed choice. In addition, the guidelines also state that consultation fees should be displayed prominently either on the signboards, counter-top tent cards or supplementary brochures providing information on the fees charged.

However, please note that this requirement of mandatory financial counselling only applies to private hospitals but not primary care medical clinics.

4. How do I know if I am undercharging or overcharging?

The best way is to advise the patient of your charges first during financial counselling and to display the charges clearly in your clinic/institution. Nonetheless, in the short term, one should not vary pricing practices drastically so as not to possibly lead to unnecessary increase in healthcare costs.

5. Can I give a ‘range estimate’ rather than a ‘point price’?

Yes. In fact, a range estimate is probably better than a point price, due to the uncertainties inherent in medical practice.

6. Should I request patients to sign a form documenting that they have received a financial counselling session and that a price range has been agreed upon?

For clinic consultations and routine investigations, this is probably unnecessary. Nevertheless, it would be advisable to document in the medical casenotes that financial counselling has been done and that the patient had accepted the price quoted.

For procedures and inpatient admissions however, this is preferable since documentation of financial counselling may already be bundled with the patient consent documentation process.

7. How do I charge for consultation fees?

The charges levied by doctors on patients should be appropriate and within reasonable limits. This would depend on a few factors, that is the skill-set, competence, experience and specialties of the doctors.

MEDIA RELEASE**Withdrawal of SMA Guidelines of Fees (GOF)**

Singapore, 2 April 2007 – The Singapore Medical Association (SMA) announced at its Annual General Meeting on 1 April 2007 that the Association is withdrawing its *Guideline of Fees (GOF)* with immediate effect. This decision by the 47th SMA Council was made after it received indications that the SMA GOF might run the risk of contravening Section 34 (2)(a) of the Competition Act and also after the Council had sought advice from five of its seven Honorary Legal Advisers.

The GOF was first introduced in 1987 with the aim to protect patients from being overcharged and to equip them with knowledge on medical procedures in hope that with improved knowledge there would be lesser cases of misunderstandings. It helped doctors with an indication of the current rates and how much to charge their patients. The guideline was the result of the collaboration of the Singapore Medical Association and the Association of Private Medical Practitioners of Singapore (APMPS) in response to the Health Ministry's call for a guide on medical charges.

To date there have been four editions of the GOF (1987, 1992, 2001 and 2006).

The SMA will be conducting a survey on clinic charges and professional fees later in the year and will publish the data before its next Annual General Meeting.

8. How do I charge for medications?

Doctors are allowed to dispense based on the principle that it is a service to patients. Drug-pricing should be priced based on cost, with a suitable mark-up based on administrative, storage, packaging and dispensing costs incurred for this dispensing service.

9. How do I charge for investigations?

Doctors are allowed to dispense based on the principle that it is a service to patients. Investigation-pricing should be priced based on cost of the services offered by laboratories, with a suitable mark-up based on administrative costs incurred. The cost for explaining the results may be lumped with the investigation price or charged separately as a consultation. Accordingly, patients should be informed beforehand which practice you are adopting.

10. How do I charge for (civil) court attendance fees and insurance medical reports?

You would have to state your charges first and come to an agreement with the lawyers and/or insurance companies beforehand when they inform you that they require your services.

11. How do I charge for urgent out-of-office-hour consultations?

Where possible, you would have to state your charges first and reach an agreement with the patients beforehand.

12. How do I conduct financial counselling in emergency life-threatening situations?

Obviously prior agreement on prices would not be possible in such situations. One suggestion would be to charge what you would have quoted to a patient in an urgent situation, including a suitable (if any) mark-up.

13. If I am a patient, how would I know what is considered a reasonable rate?

MOH has been publishing bill sizes for the various procedures in the hospitals on the MOH website. This is to ensure transparency of prices so that patients can make a better informed choice. In the meantime, SMA will also be conducting a survey to find out the prices of the various charges (such as consultation charges) in the primary care clinics. Results will be announced before the next AGM. ■