



Pitfalls in Private Primary Care Practice – A Personal Perspective (*Part 1*)

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Primary care practice is a rewarding and enriching calling.

But the going can be challenging and the practitioner has to be continually mindful of the accompanying potential minefields and how best to avoid them.

In the past, doctors could step right into private practice with the basic MBBS degree and etch out a comfortable living.

Expectations from patients were lower then and naturally so was the litigation rate.

There was less bureaucracy and red tape and the clinic overheads were inexpensive.

It was Eden.

Fast forward to the 21st century and the situation could not be more different.

This article hopes to shed some lights on the commoner pitfalls and give some pointers to the younger doctors who intends to make the leap into private primary care.

Legal and Ethical Obligations

As doctors training in the hospitals we are often not attuned to the these medico-legal and ethical obligations.

We could always defer to our seniors and administrators.

However, the moment we strike out on our own, it pays to be familiar with all the laws, regulations and professional codes governing the doctor and the practice.

Failing which, the doctor will pay dearly!

The followings are must-knows:

1 *Medical Registration Act*

The Act governs the practice of medicine and set out the the requirements for registration of doctors, accreditation for specialists and the recently, Family Physician Register.

It ensures that doctors practise competently and follow current ethical guidelines. For doctors to call themselves Family Physician, they must satisfy the basic minimum registrable criteria e.g. GDFM. Renewal of practising certificates must fulfill the minimum CME points of 50 every two years.

Physical and mental fitness to practise are also taken into consideration.

2 *The Private Hospital and Medical Clinics Act*

The Act seeks to regulate and govern the administration and management of medical clinics, private hospital and clinical laboratories.

Guidelines can be issued from time to time to all licensees for their compliance. Since 2012 the words 'Family Physician' have become protected ; clinics can only use the word ' Family ' on the signboard provided the clinic licensee is on the Family Physician register.

Doctors registering for new clinic can do so at the following website : <https://elis.moh.gov.sg>.

Be prepared for unannounced periodic audit (spot checks) by the licensing team and make sure that all the emergency medications and equipments are up to date and in good working order.

3 *Infectious Diseases Act*

The Act requires doctors to notify MOH through their e-portal (www.cdLens.moh.gov.sg) of notifiable infectious diseases. These notifications are time sensitive with some requiring notification within 24 hours and others within 72 hours.

The form MD 131 can also be used to fax in the notification.

The Zika outbreak was a case in point when daily updates and instructions were sent via email. So make sure that you maintain a valid and updated email address with MOH.

4 *Misuse of Drug Regulation*

Doctors are required to report cases of suspected drug abuse to the Central Narcotic Bureau (CNB) via eNOTIF at <https://www.enotif.cnb.gov.sg/ENotif>.

5 *Health Products Act*

This supersedes the Medicine Act and the Poison Act and includes medications that doctors prescribe which are classified as Therapeutic Products.

The significant new requirements include having the expiry dates and batch or serial numbers on the dispensed drug labels.

This is to facilitate tracing in the event of manufacturing problems or batch recall.

6 *SMC Ethical Code and Ethical Guideline 2016*

This all important and timely update covers all aspect of doctoring and it would be wise to be familiar with it.

The new guideline also covers current trends and technologies like the role of telemedicine as well as the responsible use of social media by doctors.

The guideline can be downloaded from the following link below: [http://www.healthprofessionals.gov.sg/content/dam/hprof/smc/docs/guidelines/2016%20SMC%20Ethical%20Code%20and%20Ethical%20Guidelines%20-%20\(13Sep16\).pdf](http://www.healthprofessionals.gov.sg/content/dam/hprof/smc/docs/guidelines/2016%20SMC%20Ethical%20Code%20and%20Ethical%20Guidelines%20-%20(13Sep16).pdf)

The accompanying Handbook on Medical Ethics is also a must-read. ([http://www.healthprofessionals.gov.sg/content/dam/hprof/smc/docs/guidelines/2016%20SMC%20Handbook%20on%20Medical%20Ethics%20-%20\(13Sep16\).pdf](http://www.healthprofessionals.gov.sg/content/dam/hprof/smc/docs/guidelines/2016%20SMC%20Handbook%20on%20Medical%20Ethics%20-%20(13Sep16).pdf))

7 *Retention of Medical records*

The requirement for retention of medical records stated in the MOH circular which can be downloaded at following link below: https://www.moh.gov.sg/content/dam/moh_web/Publications/Guidelines/Retention%20guidelines%202015.pdf.

In the next part, practical practice issues like medical indemnity, consent and medical reports will be discussed.

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