



SINGAPORE ASSOCIATION OF PHARMACEUTICAL INDUSTRIES

151 Chin Swee Road, #02-13A/14, Manhattan House, Singapore 169876.

T: +65-6738 0966 F: +65-6738 0977 E: admin@sapi.org.sg W: www.sapi.org.sg UEN: S66SS0025J

16 October 2020

Quality Service
Ministry of Health
16 College Road
College of Medicine Building
Singapore 169854

To whom it may concern,

The Singapore Association of Pharmaceutical Industries (SAPI) welcomes the opportunity to share its comments on the MediShield Life 2020 review. SAPI currently comprises 41 members of which 34 members are R&D based global companies, including 8 of the top 10 biopharmaceutical companies with facilities in Singapore. Our members employ close to 10,000 people in the country. SAPI aims to make innovative medicine accessible to patients in Singapore, through a sustainable and valued partnership with healthcare professionals and providers, government, patient group stakeholders, and a reputation of consistent ethical behavior.

SAPI believes that since its launch in 2015, MediShield Life has been successful in providing Singaporeans lifelong protection against large medical bills, regardless of pre-existing conditions. It is a progressive healthcare financing system and an example of how the Singapore government has supported innovation and stability. Integrated with private insurance which provides patients with more options, it also calls for individual accountability, preventing a “buffet syndrome” and ensuring responsible usage of healthcare resources.

We agree that it is both important and timely to review the benefits and premiums regularly to keep pace with evolving medical practice, healthcare cost inflation and actual claims experience. In this regard, we welcome and support the two main areas recommended for enhancement as well as provide our industry’s perspectives for your kind consideration.

Refreshing and Refining Claim Limits for Better Coverage

SAPI wholly supports MediShield Life’s objectives to cover 9 in 10 subsidized bills and to raise the annual claim limits from \$100,000 to \$150,000. We believe that this would be extremely helpful to patients who often have to seek treatment for chronic diseases and would rely on MediShield Life the most, as well as patients who require extended periods of hospitalization for their treatments.

We are pleased to see that there has been substantial increase in the claim limits for radiotherapy and radiosurgery. As the Ministry and the MediShield Life Council would be aware, cancer patients’ treatment plans often revolve around surgery, radiotherapy and chemotherapy. MediShield Life originally revised the limits for chemotherapy from \$1,240 to \$3,000 in 2015 – we welcomed this approach back then and it is clear how important this increase has been in assisting cancer patients with the affordability of treatment options. At the minimum, we hope that the Ministry of Health and MediShield Life Council maintains this limit.

While surgical claim limits and coverage were already expanded in January this year, and taking into account the currently recommended increase for radiotherapy, claim limits for cancer medications have stayed the same, notwithstanding multiple advances in cancer treatments in the past five years that have improved the survival and quality of life for cancer patients in Singapore. An increase in claim limits would help encourage the adoption of precision medicine as well as advancing the development of innovative cancer treatments.

We also urge the Ministry of Health and MediShield Life Council to consider coverage for cancer diagnostic testing, which is considered to be the defining factor in appropriate healthcare utilization as science is moving towards targeted therapies given only to patients with a high likelihood of response. Investing in cancer diagnostic testing would, in our view, be an efficient use of resources especially as it is key in guiding decisions on treatment plans and the selection of appropriate drugs. Coupled with more advanced and targeted therapies, this will provide patients with the best therapeutic outcomes.

In this regard, we hope that the Ministry of Health and MediShield Life Council will see how the current claim limits for oncology therapies and the lack of subsidies for diagnostics does not always result in the desired outcome of 9 in 10 Singaporeans paying little or no cash for subsidized bills in public hospitals. Noting that Singaporean cancer patients should not be denied the medication and/or treatment that they deserve, we urge the Council to factor this when reviewing a possible increase in the current MediShield Life claim limits for oncology medicine as well as consider including subsidies for diagnostic testing.

Other Recommendations

SAPI also welcomes the removal of standard exclusions for treatment arising from attempted suicide or intentional self-injury, drug addiction, and alcoholism. We think it is important to support these individuals in their recovery process and will go a long way in reducing the stigma to seek help for these issues.

Premium Adjustments

SAPI notes the importance of keeping MediShield Life sustainable. Having expanded the coverage of MediShield Life since 2018, we appreciate that up to 50 percent of premiums are already subsidized for Singaporeans, in addition to the Pioneer and Merdeka generation subsidies.

We note that most of the public feedback is against the rise in premiums, and welcome the additional support in the form of the two years of COVID-19 subsidies to Singaporeans to reduce the burden of these hikes. Given how COVID-19 has permeated through to our households, these measures will go a long way in providing greater financial help for Singaporeans. If possible, we urge the Council and the Ministry of Health to consider extending this to all residents in Singapore.

SAPI hopes that our comments will be taken into consideration as you look to refine these recommendations. We stand ready to support the Ministry and the Council and hope to be able to participate fully in these consultations.

Best,



Enver Erkan
President, SAPI
Managing Director, Pfizer Pte Ltd



Celine Ting
Vice President, SAPI
Managing Director, Eisai (Singapore) Pte Ltd



Ashish Pal
Vice President, SAPI
Managing Director, MSD Pharma Pte Ltd



Christina Teo
Executive Director, SAPI