



# HONG KONG COLLEGE OF RADIOLOGISTS

## 香港放射科醫學院

Founder College of the Hong Kong Academy of Medicine

(Incorporated in Hong Kong with limited liability)



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16 March 2015

*By fax and mail*

[Fax: 2840 0467]

Dr. KO Wing Man, BBS, JP  
Secretary for Food and Health  
Food and Health Bureau  
17-19/F, East Wing  
Central Government Offices  
2 Tim Mei Avenue  
Tamar, Hong Kong

Dear Dr. Ko,

**Re: Public Consultations on Voluntary Health Insurance Scheme and Regulation of Private Healthcare Facilities**

Thank you for your letter dated 18 December 2014 regarding the captioned Consultation documents released in December 2014.

The matter had been thoroughly deliberated by our Council Members at its recent Council Meetings. On behalf of the College's Council, we would like to express our views on the Regulation of Private Healthcare Facilities paper.

In general, our College recommends the Government to consider regulating the PHF providing parenteral chemotherapy treatment in the community based mainly on the Regulatory Aspect C11 annex B (3) regarding to the 1) safe reconstitution and handling of cytotoxic agents, 2) occupational safety.

In addition, our College's Council would like to comment on **Regulatory Aspect C11 – Standards Specific to Procedures Performed:**

- 1) Annex B(1): Recommended Scope of High-risk and Hospital-only Procedures  
(A) Risk of Procedures and  
(D) Hospital-only procedures

The College notes that image-guided core biopsy [except breast and superficial lymph node] is included as one of the high-risk procedures, and image-guided biopsy of deep seated organ is placed under the category of hospital-only procedures. Image-guided biopsy is an important facet of Interventional Radiology and its role is rapidly expanding. The risk of a biopsy procedure is manifold and the anatomical location of the structure is only one of the contributing factors. Other factors like the relevant structure targeted and technology employed for the procedure should also be considered in risk assessment. The College suggests that the recommended scope should be expanded to cover other contributing factors in delineating high-risk procedures.

Overall, our College supports in principle the need for regulation of private healthcare facilities and the performance of high risk procedures. The proposed high-risk procedures including parenteral chemotherapy (cytotoxic) treatment and interventional radiology in the ambulatory settings would be provided by our College Fellows in the Specialties of Radiology and Clinical Oncology. Hence, we earnestly request to be consulted and allowed to participate in the process of legislation to ensure that the final legislation ultimately serves its purposes to protect the Public while striking a balance so that it is realistically possible for our Fellows providing parenteral chemotherapy treatment and interventional radiology in the community to comply.

With best regards,

Yours sincerely,

Dr. Law Chun Key  
President  
Hong Kong College of Radiologists

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