

Healthcare Planning and Development Office
Food and Health Bureau
19/F, East Wing,
Central Government Offices,
2 Tim Mei Avenue Tamar
Hong Kong

16th February 2015

Dear Senior executive officer,

Opinion on "Regulation of Private Healthcare Facilities"

We have drafted some recommendations on the B8 section of the "Regulation of private healthcare facilities" consultation document and would like to submit for your consideration.

An e-copy of the recommendation has been sent to the e-mail address hpdo@fhh.gov.hk on 16th February 2015.

Please find the hard copy of the recommendation FYI.

If you have any enquiry or require any further assistance in drafting the consultation document, please do not hesitate to contact us.

Wish you a happy and successful year of Lamb.

Yours sincerely,

David and Alan
Contact number:
David Lung
Alan Wu

Recommendation on section B8 Infection control in the “Regulation of Private Healthcare Facilities”

By David Lung and Alan Wu

With reference to the consultation documented issued in December 2014, titled “Regulation of Private Healthcare Facilities”, section B8 on Infection control,

“ We propose that all classes of PHFs proposed to be regulated should be subjected to mandatory requirements on infection control. In particular, hospitals and ambulatory medical centres.....There should also be a designated person to oversee infection control measures....”

We have the following suggestions and recommendation:

1. Lack of elaboration of the term “designated person”
 - The consultation document cited **two** documents for reference:
 - **MoH Singapore Guidelines**, under “The Private Hospitals and Medical Clinics Act 1980 AND Regulations 1991”. In the named document, section on Infection Control (Reg 31), section 4.43 b, it states that
 - i. “An **Infection Control Committee** shall be established. **Infection Control staff** shall be appointed, trained and authorized to carry out such monitoring and control activities”.
 - ii. This document did not state clearly the qualification of the “Infection Control Staff”.
 - **National Minimum Standards for Independent Health Care Services in Wales**, Standard 13 on Infection Prevention and Control (IPC) and Decontamination, Regulation 9, 15 (Document page 53) states that:
 - i. “A **corporate level lead or adviser** for IPC who can provide timely and specialist advice to the organization on all aspects of IPC”
 - ii. “A multi-disciplinary Infection Control Team and where appropriate, **access to a Clinical Microbiologist**”
 - iii. In this document, again, the qualification of “the corporate level lead or adviser” is not stated clearly. However it mentioned that the infection control team should have access to a Clinical Microbiologist. In the United Kingdom, most of the hospital infection control teams are led by Clinical Microbiologist.
 - iv. The **best option** would be the **Clinical Microbiologist** acting as the leader/chairperson of the IPC team/committee, which is the **standard practice** in public hospitals in Hong Kong.
 - v. In the current private hospital setting, direct and timely access to a Clinical Microbiologist is very limited, only a handful of hospitals would be able to achieve this

requirement.

2. Recommendations from other relevant documents not cited in the consultation document of FHB:
 - JCI Infection Prevention and Control Requirements Appendix 1, PCI 1
 - i. **“One or more individuals oversee** all infection prevention and control activities. This individual(s) is qualified in infection prevention and control practices through **education, training, experience, or certification.** “
 - ii. In the JCI document, again, it did not specify the qualification, but it is clear that the person overseeing all the infection control policies should possess relevant training and qualification.
 - The International Federation of Infection Control (IFIC), Basic Concepts of Infection Control 2nd Edition, Chapter 2 Organizational Structure, it states that:
 - i. The Infection Control Committee (ICC) membership should reflect the spectrum of clinical services and administrative arrangements. It should include:
 1. Chief Executive/Administrator or his/her nominated representative
 2. **Infection Control Doctor/Microbiologist** who may act as a **chairperson**
 3. Infection Control Nurse (ICN)
 4. Infectious Disease Physician (if available)
 5. Director of Nursing or his/her representative
 6. Occupational Health Physician (if available)
 7. Representatives from the major clinical specialties
 8. Representatives of other departments (pharmacy, central supply, maintenance, housekeeping, training services, etc.) may be invited as necessary
 - ii. It is clear from the IFIC basic concepts, that the chairperson of the ICC should be a **Microbiologist or Infection Control Doctor.**
 - Practical Guidelines for Infection Control in Health Care Facilities, published by the World Health Organization, it states that:
 - i. “Health care establishments must have access to **specialists in infection control, epidemiology and infectious disease**, including **physicians and infection control practitioners.**”
 - ii. A **Clinical Microbiologist** is a “physician specialized in infection control, epidemiology and infectious disease”, however an **Infectious Disease specialist** with **appropriate infection control training** would also serve the purpose stated by the WHO document.
3. There is no regulation in Hong Kong to limit a person practicing infection control should possess a certain academic degree, it would be very difficult to determine who is considered to be the appropriate “designated person”. But with reference to the infection control organization structure of the Hong Kong Hospital Authority (HA), all the cluster infection teams of HA hospitals (Cluster ICO) are led by Clinical Microbiologists, where ICO of other branch hospitals can be medical doctors of other specialties. And the entire structure is overlooked by a Chief Infection Control Officer (CICO), whom by training, is also a Clinical Microbiologist. Infectious diseases specialists with appropriate training in infection control are also considered as the appropriate personnel.

4. The “designated person” must possess a formal training in both infection control and infectious diseases, to have sufficient medical knowledge to understand the importance of the problem, and able to shoulder the responsibility. Since many times, infection control decision may involve in-depth medical knowledge in clinical infectious diseases and laboratory medicine, where a Clinical Microbiologist or an Infectious Diseases physician will be required.
5. The discussion of the details of the infection control program may not be appropriate in the consultation document, therefore it is important for an appropriate personnel to design, carry out and monitor the infection control program in the PHF setting. And the personnel must possess appropriate qualification and knowledge to carry out such duty.
6. The role of the “designated person”:
 - Bridge between clinical, laboratory and administration level of the private hospital
 - Leading role in the infection control committee
 - Responsible and overlook all infection control matter (including antibiotics stewardship programme) in the private hospital
 - Policy maker of infection control issues
 - Outbreak investigation and management
7. Unless the FHB thinks that patients attending the private healthcare facilities deserves lower standard of care, otherwise, when benchmarking with public hospitals, the “designated person” should be a medical doctor with appropriate training in **infection control AND infectious diseases** (preferable also have knowledge in laboratory medicine) to overlook the infection control committee, either a Clinical Microbiologist or an Infectious Disease specialist with infection control training.
8. Ambiguity does not allow flexibility, it would promote contempt of PHF to create fake and dummy infection control team, just to fulfill the requirement of the government and ignoring patient’s safety and pretending to offer quality health care. The government should take note of good practice in selected private hospitals and using them as role model to quality patient care and safety.
9. Currently, many private hospitals are equipped with a crippled infection control team, by assigned a medical doctor as the ICO, whom does not have any formal and appropriate training in infection control or infectious diseases.
10. Therefore, we recommend the following principles in regulating PHF:
 - Appropriate person with relevant training to take up the responsibility of infection control issues, and the designated person is held accountable for all infection control problems arising.
 - To have a central government organization to regulate and oversee the PHF
 - To make the PHF reportable to the central government organization and ensure compliance to local guidelines and meet the international standards
11. With reference to the reference stated above and principles derived, we propose:
 - A government organization to overlook and regulate all the ICC of the private hospital and IC matters of non-hospital health care facilities, benchmarking the role of the CICO in HA.
 - The “Designated person” mentioned in the consultation document must be a Medical doctor

with appropriate training in **infection control AND infectious diseases**, preferable full time, but part-time will also be acceptable in private hospital settings.

- For medical centers (non-hospital health care facilities), they should assign a designated link nurse to overlook infection control issues and report to the relevant government organization.

Appendix 1: Internationally recognized infection control training program (modified from Best Practices in Infection Prevention and Control: An International perspective, Second Ed)

Organization	Description	Website	Professional Degree
Royal College of Pathologist	Medical Microbiology training Infection prevention and control is a major part in the training program	http://www.rcpath.org/Resources/RCPath/Migrated%20Resources/Documents/T/FINAL_MICROBIOLOGY_CURRICULUM_June14.pdf	FRCPath Quotable in Hong Kong
Royal college of pathologists of Australasia	Infection control is part of the microbiology training curriculum	http://www.rcpa.edu.au/Library/Practising-Pathology	FRCPA Quotable in Hong Kong
Hospital Infection Society (HIS), the London School of Hygiene and Tropical Medicine (LSHTM), and the Public Health Laboratory Service (PHLS)	Diploma in Hospital Infection Control established in 1997 for IPC practitioners, IPC physicians, microbiologists, epidemiologists, and others who complete the requirements of training	http://www.lshtm.ac.uk/	DipHIC Not quotable in Hong Kong
The international Federation of Infection Control (IFIC)	Basic training course	http://www.theifc.org	Nil
The Certification Board of Infection Control and Epidemiology Inc.	Certification course examination (based on the US practice analysis) in many countries	https://www.cbic.org/	CBIC Not quotable in Hong Kong

Appendix 2: Locally recognized infection control training program

Organization	Description	Website	Professional Degree
Hong Kong College of Pathologist	Clinical Microbiology and Infection training Infection control is a major part in the training program	http://www.hkcpath.org/	FHKCPath Quotable in Hong Kong
The University of Hong Kong School of Nursing	Certificate in Infection Control 6 modules for practicing nurse	http://nursing.hku.hk/cms/en/education/certificate-course	Certificate only
The University of Hong Kong School of Nursing	Master of Nursing Infection Control is one of the four study tract where students may join	http://nursing.hku.hk/cms/en/education/postgraduate/master-of-nursing	For Nursing only
The Hong Kong Polytechnic University School of Nursing	Master of Science in Infection Control	http://sn.polyu.edu.hk/en/home/	MSc in Infection Control For Nursing only
Squina International Centre for Infection Control (CIC)	Infection Control Course for Health Care Professionals This course has been organized by Prof Seto WH and Ms. TY Ching and is one of the most well established infection control course in Hong Kong. Basic and Advance level are available	http://squina-cic.sn.polyu.edu.hk/en/conferences/index.htm	Certification of merit only, no quotable degree available