

Date: 29 March, 2006

To : Panel on Health Service, Legislative Council of Hong Kong

From : Hong Kong Dental Association

Subject: Regulation of Health Maintenance Organizations

The Hong Kong Dental Association feels that Health Maintenance Organizations should be strictly regulated as their operation affects the health and welfare of many of the Hong Kong citizens. Our members have reported to us that:

- 1 HMOs are business enterprises, their main purpose is to make money. They deprive the employee dentists of their rightful remuneration, and offer minimal return to their clients-patients.
- 2 HMOs advertise heavily and make cold calls. Constant telephone messages and mail inserts that one receives daily are irritating and repulsive. This is a nuisance to ordinary citizens and intruding into their privacy.
- 3 In case of legal complexities, such as bankruptcies and licensing faults, the employee dentists are usually held responsible and not the business owners. The patients are usually left out in the cold.
- 4 The HMOs tend to buy cheap supplies to save costs that affect the well being of the sick.
- 5 In order to save money, business employers force dentists and doctors to make diagnosis or to perform work that should be done by specialists, treat more patients than they can handle, and use cheap and sometimes unregistered supplies. This may cause misdiagnosis and maltreatment of patients. Subsequently, patients suffer.
- 6 HMOs, because they have investors, use low cost to attract clients, and then coerce the employee dentists to 'sell' expensive, and unnecessary dental work to their clients. It usually ends up costing more to the clients.
- 7 Patients complain that appointments are difficult for the items covered by the standard dental plan, however, for expensive work not covered by dental plan, appointments are easy. This shows that HMOs provide the least amount of resources to fulfill their obligations.
- 8 Doctor-patient rapport cannot be established, and mistakes can be made in an HMO environment because they overwork their employee dentists. Patients, in turn, receive poor quality service.
- 9 Complaints against HMOs from patients are rampant.

We feel that HMOs should be regulated; to regulate HMOs the Hong Kong Dental Association asserts that:

- 1 HMOs should be governed under the jurisdiction of the Dental Council or the Medical Council same as private practitioners, in addition to register as business entities.
- 2 Dental HMO companies should not be allowed to advertise and they should act according to the same standards of ethical behavior as stated in the 'Warning Notice for Dentists' issued by the HK Dental Council.
- 3 HMOs should not be allowed to canvass or solicit patients. Cold calls on mobile phones, mail inserts should not be allowed. They should not be allowed to liaise with commercial firms, such as credit card companies, real estate developers, etc. as a benefit for using their services.
- 4 Majority of directors of a dental HMO incorporated company should be dentists.
- 5 'Middle man' type HMOs, who get a fee-split for recruiting patients and then referring them to dentists should not be allowed.
- 6 HMOs should not be allowed to dictate dentists on the type of treatment or drugs used, or coerce the dentists to sell expensive dental work.
- 7 Government should not outsource their dental services to business HMOs.

In conclusion, the Hong Kong Dental Association recommends the preclusion of HMO in dentistry or that they should be strictly regulated. HMOs provide poor quality services, they advertise and they put the patients' health in jeopardy. This has happened many times. It is usually the patients who suffer the most in a society that HMOs exist.

We strongly oppose the government's view on not to regulate HMOs, because complaints against HMO increased by 400% in the past three years. We feel that the government is being irresponsible if it does not set up laws to regulate HMOs.