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Referring to Page C1637, this proposed bill applies to private healthcare facilities: to repeal the Hospitals, Nursing Homes and Maternity Homes Registration Ordinance and provide for the *transfer of nursing homes for elderly persons to be regulated under the Residential Care Homes (Elderly Persons) Ordinance*; to repeal the Medical Clinics Ordinance and its subsidiary legislation; and to provide for incidental and related matters.

This bill aims to make changes to the existing healthcare facilities such as Hospitals, Nursing Homes and Maternity Homes. However, on page C1641, under the interpretation of **facility service**:

Item (b), *the provision of a diagnostic or therapeutic procedure in the facility*;

HKAML wants to point out that medical laboratory technologists are currently regulated under Chapter 359A. Therefore, medical laboratory testing should not be confused with other diagnostic or therapeutic procedures in this bill especially since hospitals also provide diagnostic laboratory services.

Similar confusions are also found on page C1653, Clause 7 (c) (i) & (ii):

Clause 7. Meaning of health service establishment

(c) that are used, or intended to be used, in relation to –

(i) assessing, maintaining or improving the health of patients; or

(ii) diagnosing or treating illnesses or disabilities, or suspected illnesses or –

HKAML would like to have these two areas, assessing and diagnosing to be better defined and have these clearly differentiated from diagnostic testing performed by medical laboratories.

HKAML understands that this bill is expected to regulate private healthcare facilities such as hospital, nursing homes and maternity homes. The term diagnostic or diagnosis generally refers to a specific behavior or test ordered by a doctor for making a diagnosis for their patients. Therefore, the role and function of medical laboratories should not be confused with other diagnostic tests, and definitions and should be made more clear in this bill.

Other than this clarification, HKAML has no other concerns.

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