

# MORATORIUM ON GENETIC TESTING AND INSURANCE

BY THE MINISTRY OF HEALTH AND LIFE INSURANCE ASSOCIATION, SINGAPORE

## INTRODUCTION



The Ministry of Health (MOH) and the Life Insurance Association (LIA) "Moratorium on Genetic Testing and Insurance" sets limits on the use of genetic test results in insurance underwriting. The Moratorium was first introduced in 2021 ("2021 Moratorium") and later amended and re-signed in 2025 ("2025 Moratorium").

Since 27 October 2021, life insurers in Singapore are not allowed to ask applicants for their predictive genetic test result, if they had taken such a test, and are not allowed to use the test result for assessing the applicant's health profile.

However, if certain criteria are satisfied, life insurers may ask for and use the results of approved predictive genetic tests for assessing the applicant's health profile.

The Moratorium was co-developed by MOH and LIA to protect Singapore Residents\* from having their insurability impacted as a result of having taken predictive genetic tests.

\*A Singapore Resident refers to Citizens, Permanent Residents of Singapore, as well as Residents with an Employment Pass / Work Permit<sup>1</sup> / Pass Permit<sup>2</sup>

## WHAT IS ALLOWED UNDER THE MORATORIUM?



YOUR LIFE INSURER CAN:	YOUR LIFE INSURER CANNOT:
<ul style="list-style-type: none"> <li>Use the result of any <b>diagnostic</b> genetic test (except for Familial Hypercholesterolaemia ("FH") test conducted under National FH Genetic Testing Programme), similar to non-genetic diagnostic test result, for assessing and deciding the outcome of your insurance application</li> </ul>	<ul style="list-style-type: none"> <li>Ask you to take a genetic test (diagnostic<sup>3</sup> or predictive) before assessing an insurance application</li> <li>Ask you to disclose, and use the result of any predictive genetic test for assessing your insurance application if the test was taken for biomedical research</li> </ul>
<ul style="list-style-type: none"> <li>Ask you to disclose, and use the result of any diagnostic FH genetic test <b>not</b> conducted under the National FH Genetic Testing Programme</li> </ul>	<ul style="list-style-type: none"> <li>Ask you to disclose, and use the FH genetic test result, whether it is predictive or diagnostic, for assessing your insurance application if the test is conducted under the National FH Genetic Testing Programme</li> </ul> <p>However, you are to disclose the doctor's diagnosis of your personal FH condition and family history of FH; which is part of typical medical history disclosure required for insurance underwriting</p>
<ul style="list-style-type: none"> <li>Use the result of any <b>predictive</b> genetic test which is given to the insurer by you or any other person, be it voluntarily, accidentally, or otherwise, if the result is favourable to you</li> </ul>	<ul style="list-style-type: none"> <li>Ask you to disclose, and use the result of any predictive genetic test for assessing your application if the insurance or test is one of these:                             <ul style="list-style-type: none"> <li>Health insurance, including Integrated Shield Plans (IP)</li> <li>Group insurance, including affinity plans</li> <li>Any other types of insurance not covered by the Moratorium</li> <li>General insurance</li> <li>The test is taken after the insurance coverage has started (unless you consented to take the test before the coverage started)</li> <li>Direct-to-Consumer genetic test</li> <li>Test that is done on another person, for example your blood relative</li> <li>The test is taken as part of the National FH Genetic Testing Programme</li> </ul> </li> </ul>

## HOW WILL YOU BE IMPACTED?

ONLY IF YOU ARE BUYING ANY OF THE INSURANCES LISTED BELOW:

### 1 LIFE INSURANCE



### 2 TOTAL PERMANENT DISABILITY INSURANCE



### 3 LONG-TERM CARE INSURANCE



### 4 CRITICAL ILLNESS INSURANCE



### 5 DISABILITY INCOME INSURANCE



<sup>1</sup>It should not be less than a total of 183 days in the 12 months before the insurance application date.

<sup>2</sup>It should not be less than a total of 90 days in the 12 months before the insurance application date.

<sup>3</sup>Diagnostic genetic tests confirm or rule out a diagnosis based on existing symptoms, signs or abnormal non-genetic test results which indicate that the condition in question may be present.

## THE DOUBLE-KEY MODEL<sup>4</sup>

IF THE DOUBLE-KEY MODEL IS SATISFIED, YOUR LIFE INSURER CAN ASK FOR AND USE THE RESULTS OF CERTAIN PREDICTIVE GENETIC TESTS FOR ASSESSING YOUR INSURANCE APPLICATION



TYPE OF INSURANCE	KEY 1 Above the financial limit of (SGD) (aggregated per life basis)	KEY 2 Approved predictive genetic tests
LIFE INSURANCE	\$2,000,000 SUM ASSURED	HUNTINGTON'S DISEASE (HTT)
TOTAL PERMANENT DISABILITY INSURANCE	\$2,000,000 SUM ASSURED	
LONG-TERM CARE INSURANCE <i>Two or more ADLs<sup>5</sup> for at least six months</i>	\$3,000 PER MONTH	HUNTINGTON'S DISEASE (HTT)
LONG-TERM CARE INSURANCE <i>One ADL only</i>	\$3,000 PER MONTH	
CRITICAL ILLNESS INSURANCE	\$500,000 SUM ASSURED	BREAST CANCER (BRCA 1) (BRCA 2)
DISABILITY INCOME INSURANCE	\$10,000 PER MONTH	

Only if both keys are unlocked can your life insurer ask you to disclose, and use, the result of approved predictive genetic test(s) which you had taken in the past for assessing your insurance application, or which you may take in the future for re-assessing the terms of the policy after the policy has been issued to you.

For **non-residents**, application of the Double-Key Model is not compulsory, which means a life insurer can ask you to disclose, and use the result of any predictive genetic test (including but not limited to HTT, BRCA1 or BRCA2) for assessing your application for any of the five types of insurance, regardless of the Sum Assured amount proposed.

## HOW IT WORKS

### Illustration 1



**DEBBIE SITS DOWN WITH A FINANCIAL CONSULTANT.**



Debbie is a young woman looking for a critical illness plan.

I'm looking to buy a critical illness plan with a Sum Assured of \$750,000.

In this case the life insurer can ask for and use predictive genetic test results for Huntington's disease and breast cancer.

Does this mean I will automatically be disqualified from coverage? I have previously taken a predictive genetic test for breast cancer.



**First key** is unlocked as the Sum Assured exceeds the financial limit of \$500,000 for critical illness plans.



**Second key** is unlocked as breast cancer tests (BRCA1, BRCA 2) are approved predictive genetic tests for critical illness plans.

No, you will not be automatically disqualified. You will have to disclose the result since you have taken the test, and your coverage will be determined by the life insurer after reviewing your predictive genetic test result along with your other health declarations.



### Illustration 2



**JASMINE SITS DOWN WITH A FINANCIAL CONSULTANT.**



Jasmine is a woman looking for a life insurance plan.

I am buying an insurance plan. I was referred to participate in the National FH Genetic Testing Programme even though I do not have any symptoms or signs of a genetic disorder. However, I have received a positive FH genetic test result, do I need to declare in my insurance application form?



You do not need to declare as this is considered a predictive FH genetic test which will be protected by the Moratorium. Under the Moratorium, you do not need to disclose the result of any predictive and diagnostic FH genetic test for assessing your insurance application if the test is conducted under the National Familial Hypercholesterolaemia ("FH") Genetic Testing

Insurers are still allowed to request the disclosure of and/or use the doctor's **diagnosis** and family history of FH condition.

<sup>4</sup>The Double-Key Model does not apply to the National FH Genetic Testing Programme.

<sup>5</sup>Activities of Daily Living means a set of activities such as bathing or washing, dressing, feeding, transferring, mobility and toileting.