



香港罕見疾病聯盟

Hong Kong Alliance for Rare Diseases



會務報告
ANNUAL REPORT

2018

香港罕見疾病聯盟 2018 年會務報告 會長：曾建平 (2019 年 1 月)

2018 年香港罕見疾病聯盟(下稱「罕盟」)快速成長。政策倡議、提昇認知、能力建設、對外交流等各方面工作均有良好進展，成效顯著。

1. 政策倡議是罕盟的核心會務

2018 年罕盟在藥費分擔機制和罕病藥物審批辦法兩個與患者息息相關的重要層面，取得了初步的實質倡議成果；並史無前例地推出「民間安全網」，為一批需要處方未納入醫院管理局名冊的藥物的患者，提供可預算的優惠治療計劃，最終促使醫院管理局將藥物納入名冊。以上這些成果，令為數不少的罕病患者，在獲取治療上帶來重大的實質改善。

1.1. 藥費分擔

承接 2017 年就昂貴藥費分擔機制與數十個機構的持份者面對面諮詢的基礎，罕盟於 2018 年 1 月舉行藥費分擔機制專題研討會，就草擬的初步方案進一步聽取各方持份者的意見，其後於 4 月向政府提交最終方案(詳見附件一)。

罕盟的方案基於病有所醫、能者多付和維持尊嚴三大核心價值，就家庭定義、資產計算及豁免範圍、以及病人分擔比率和上限等，提出優化方向和具體建議。

提交方案後，罕盟不止一次地與政府委聘的顧問團隊會面，詳細解釋罕盟的理念和方法；並且多次組織罕病患者和照顧者與顧問團隊會面，面對面地述說具體個案，從而論證罕盟方案的針對性和合理性。

政府於 11 月向立法會提交的文件，確立了修改家庭定義和按 50% 計算可動用資產的兩項優化措施，雖然具體方法與罕盟提出的具體建議不盡相同，不過方向和目的與罕盟的思路不謀而合，大致上回應了患者和照顧者的主流訴求。

1.2. 藥物審批

罕病藥物的審批制度是現時病人獲取治療的重大障礙。醫院管理局繁複而漫長且欠人性化的藥物審批制度，加上以「成本效益」凌駕病人的健康和生命的思維範式，以及無視罕病個案稀少和長期療效數據不多的客觀事實，令罕病用藥極難在現有機制下短時間內通過審批，嚴重妨礙患者獲得及早治療。

在罕盟不斷反映和倡議下，去年醫院管理局同意為罕藥審批和式用作出新的安排。除現有藥物建議委員會(DAC)審批機制外，將試行由專家委員會審批及決定使用罕藥及納入安全網，這些藥物未必即時納入藥物名冊，但會在公營醫療系統供臨床使用。

醫院管理局表示，由專家委員會審批使用的罕藥一般準則為：暫無其他藥物治療該種罕病；數據及個案較少；藥價昂貴。

去年中脊髓肌肉萎縮症(SMA)，以及下半年家族性澱粉樣多發性神經病變(FAP)的用藥，便是參照這項打破以往慣例的新安排，令患者得以較早有用藥治療的機會。預計今後陸續有新的罕病藥物，透過這種模式較快讓罕病患者獲得合適的治療。

1.3. 「民間安全網」

有見罕病藥物往往難以及時納入醫院管理局藥物名冊，病人無法儘早獲得適切治療，罕盟與呼吸系統科專科醫生、非牟利社區藥房及藥廠合作，於 3 月為罕見的特發性肺纖維化(idiopathic pulmonary fibrosis)提供「特發肺纖愛心送暖

用藥計劃」，讓在全港公私營醫療機構就診的患者，及時以較低廉的價錢接受治療，並在用藥二十四個月後免費用藥，直至醫生改變處方為止，令病人有明確的醫療費用預算。

這項以在全港公立和私家醫生就診的病人為受惠對象的用藥計劃，是病人組織、專科醫生、非牟利社區藥房和商界攜手協作的創舉，是史無前例的首個「民間安全網」，各方都以病人儘早得到適切治療為先，充份體現愛心送暖的意義。此計劃以創新思維改善藥物的可及性，不只有助患者及早接受治療，亦間接令醫管局可以集中資源資助經濟能力最差、最需要政府資助的一群患者。



到 2018 年年底為止，已有 50 多名特發肺纖患者在這項計劃支援下得到藥物治療。醫院管理局亦在罕盟等敦促下，於 10 月將該種罕藥納入藥物名冊自購藥類別，並於 2019 年 1 月起在醫管局藥房配發，為下一步納入撒瑪利亞基金等安全網鋪平道路。

1.4. 整全策略

除以上倡議成果外，罕盟去年多次致函行政長官，感謝她對脊髓肌肉萎縮症用藥親自過問，令患者迅速獲得藥物，同時指出她不可能為每一種罕病患者站台，過問每一種罕藥的引入。罕盟透過向行政長官施政報告提交意見書(詳見附件二)以及去信，多次敦促行政長官著手製定罕病定義和整存的策略，在篩查、檢測、診斷、治療、復康、研究、人材培訓和職位配置等方面作出有系統的統籌規劃，才是應對罕病挑戰的負責任和有效取向。

1.5. 《殘疾人權利公約》民間報告

此外，罕盟還參與香港復康聯會向聯合國殘疾人權利委員會提交香港履行《殘疾人權利公約》第二份民間報告的起草工作；並就香港康復計劃方案檢討積極組織會員提交意見。

1.6. 調查研究

為了進行實證為本的政策倡議，罕盟於去年委托香港中文大學公共衛生及基層醫療學院，進行「香港罕見疾病的情況與影響」研究，在 4 至 9 月期間訪問了三百四十多位患者和照顧者，收集大量有用數據。中大研究團隊對有關數據作出分析研究後，預計於 2019 年上半年發表報告。

2. 提昇認知

要配合政策倡議，令罕病患者的醫療服務和社會支援得到改善，提昇市民對罕病的認知，取得民意支持，是不可或缺的工作範疇。

2.1. 《罕情》

去年罕盟發行名為《罕情》的季刊共四期，報導罕盟和罕病團體的活動和工作，介紹罕病資訊，深受患者、照顧者和各界持份者的注意和歡迎，成為推廣罕病訊息的標誌性刊物。

2.2. 社交媒體

有鑒於罕病訊息廣泛而多元，罕盟於去年將臉書貼文進行分流，除原有官方臉書外，增設了罕病資訊站，兩個界面各有側重和特色，發揮多元互補，莊諧並蓄的效果，關注者穩步上昇，直到2018年底追隨者已達3,000人（兩個專頁合計）。

2.3. 大眾傳媒

罕盟去年繼續透過傳統和新興媒體，或主動接觸，或接受邀請，發放罕病訊息，發表政策主張。無論是報章、雜誌、電視、電台、網媒以至大專院校的傳播渠道，罕病已逐漸成為常見的資訊題材，有效加深市民大眾對罕病的認知。

2.4. 舉辦研討會

罕盟去年二月舉辦世界罕病日研討會，邀請國際罕病聯盟（Rare Disease International）主席和台灣全民健康保健署署長，就全球各地罕病政策和台灣提供罕藥的經驗發表演講；並展示美、歐、亞三大洲十二個國家地區罕病規劃和病人參與比較的海報，突顯香港在罕病策略的落差。



2.5. 「金像同行」

去年「香港電影金像獎協會」選擇罕盟作為當年電影金像獎活動的社區同行伙伴機構，於4月份金像獎頒獎禮上邀請罕盟代表以及罕病患者和照顧者與演藝人同台宣傳罕病訊息，拍攝宣傳短片，對傳達罕病訊息起到有別於一般媒體的成效。



2.6. 工作坊及外展講座

罕盟從去年第四季度開始，組織和培訓患者和照顧者，到本地中小學進行外展講座，介紹罕病資訊，分享患者克服逆境堅毅上進的生命故事，還讓同學認識醫療政策和無障礙環境，令他們在青少年階段就接觸罕病和殘疾人士的訊息。



3. 能力建設

無論是政策倡議，還是提昇認知，都要依靠罕病患者和照顧者作為主體。他們的能力建設，成為關鍵環節。

3.1. 境外交流

罕盟於去年9月組織和資助患者和照顧者到上海出席「第七屆中國罕見病高峰論壇」，逾二十名病友及義工出席。他們透過聽取演講及與來自各省市的伙伴們溝通交流，對罕病的最新研究和治療進展，以及內地的政策變化，有了直接和多方的認識。他們在回港後的總結會表示，了解內地的罕病政策、病友組織以及醫患關係等之後，擴闊了大家的思路，以及可供借鑒之處，有助今後的工作。



3.2. 病人名冊

罕盟於2017年為有興趣的罕病團體舉辦兩次病人名冊工作坊，去年繼續鼓勵和支持他們開展實質工作。雷特氏症和結節性硬化症兩個罕病小組已正式推行病人名冊計劃，陸續進行製訂框架和收集數據的工作。

3.3. 權利為本

罕病患者與殘疾人士的基本權利息息相關，罕盟去年鼓勵和支持會員多次參與與聯合國《殘疾人權利公約》有關的培訓，加深對《公約》核心價值尤其是「權利為本」的認知。



3.4. 專題講座

近年針對家族性澱粉樣多發性神經病變 (Familial Amyloidotic Polyneuropathy; FAP) 的藥物陸續面世，本地確診個案數目亦告上升。為加深 FAP 患者及照顧者對此罕病的認識，罕盟於11月24日舉辦了「FAP 病友交流會」，邀請專科醫生解構疾病成因、影響範圍、現行治療及應對方法；亦向病友及照顧者簡介政府藥物資助計劃的申請辦法與細節。出席人互動交流，互相認識，討論與疾病有關的心得和經驗。



3.5. 增強互助

罕盟於2018年3月初與幾名威爾遜氏症病人見面。其後小組發起人建立了小組的臉書專頁及通訊群組，群組成員人數逐步增多，於2018年12月舉行「關注組」成立典禮，成員分享患上威爾遜氏症的歷程與治療心得，小組更定下短期目標—到內地醫院考察及推廣疾病篩檢計劃。



4. 對外聯絡

4.1. 國際會議

罕盟去年5月派代表出席國際罕病聯盟 (Rare Disease International) 在奧地利維也納舉行的年會，以及第八屆歐洲罕病大會。罕盟透過發言和展示海報，分享工作進展和成效，與來自世界各地的病友和臨床及研究人員等進行溝通交流。



4.2. 亞太行動

罕盟於去年10月派代表到新加坡出席亞太罕病聯盟 (Asia Pacific Alliance of Rare Disease Organizations) 年會，與區內罕病團體共同商議本地區罕病政策倡議的策略，並與亞太經濟合作組織 (Asia Pacific Economic Cooperation) 就亞太地區罕病行動計劃達成協作共識。



罕盟會員涵蓋的罕病類別：

- 1 10q.26.2 缺失症候群
- 2 18q21.2 x 3 症候群
- 3 22q11.2 Distal Deletion Syndrome
- 4 22q13.33 缺失症候群
- 5 軟骨發育不全症 Achondroplasia
- 6 肢端肥大症 Acromegaly
- 7 天使綜合症 Angelman Syndrome
- 8 抗胰島素 Antibody Insulin
- 9 再生不良性貧血 Aplastic Anemia
- 10 先天性多發性關節攣縮症 Arthrogyrosis Multiplex Congentia
- 11 非典型性尿毒溶血症候群 Atypical Hemolytic Uremic Syndrome
- 12 貝賽特氏症 Behcet's Disease
- 13 口腔灼熱症候群 Burning Mouth Syndrome
- 14 CFC 綜合症 Cardiofaciocutaneous Syndrome
- 15 腓骨肌肉萎縮症 Charcot Marie Tooth Neuropathy
- 16 骨膠原蛋白第12基因 COL12A1
- 17 先天性青光眼 Congenital Glaucoma
- 18 克斯提洛氏彈性蛋白缺陷症 Costello Syndrome
- 19 貓哭症 CRI DU CHAT Syndrome
- 20 克隆氏症 Crohn's Disease
- 21 CTNNA1 症候群
- 22 DDx3x 基因突變
- 23 DNM1 基因突變

- 24 迪喬治症候群 DiGeorge Syndrome
- 25 杜興氏肌肉營養不良症 Duchenne Muscular Dystrophy
- 26 外胚層發育不良 Ectodermal Dysplasia
- 27 法布瑞氏症 Fabry Disease
- 28 面肩胛肱型肌營養不良症 Facioscapulohumeral Muscular Dystrophy
- 29 家族性澱粉樣多發性神經病變 Familial Amyloidotic Polyneuropathy
- 30 進行性肌肉骨化症 Fibrodysplasia Ossificans Progressiva
- 31 GRIN1 Glutamate Receptor, Ionotropic, N-Methyl D-Aspartate 1
- 32 肝醣儲積症第一型 Glycogen Storage Disease Type 1
- 33 溶血性尿毒綜合症 Hemolytic-Uremic Syndrome
- 34 亨丁頓舞蹈症 Huntington's Disease
- 35 卡爾曼氏綜合症 Kallmann Syndrome
- 36 KCNQ2
- 37 甘迺迪氏症 Kennedy Disease
- 38 先天性靜脈畸形骨肥大症候群 Klippel-Trénaunay Syndrome
- 39 朗格漢斯組織細胞增生症 Langerhans Cell Histiocytosis
- 40 楓糖尿症 Maple Syrup Urine Disease
- 41 髓母細胞瘤 Medulloblastoma
- 42 線粒體病 Mitochondrial Disease
- 43 運動神經細胞疾病 Motor Neuron Diseases
- 44 黏多醣症 Mucopolysaccharidoses
- 45 多發性骨骺發育不良 Multiple Epiphyseal Dysplasia
- 46 腦下垂體發育不全 Multiple Pituitary Hormone Deficiency Anterior Pituitary Hypoplasia
- 47 多發性硬化症 Multiple Sclerosis
- 48 肌肉營養不良症 Muscular Dystrophy
- 49 重症肌無力症 Myasthenia Gravis
- 50 桿狀體肌肉病變 Nemaline Myopathy
- 51 神經纖維瘤 Neurofibromatosis
- 52 視神經脊髓炎 Neuromyelitis Optica
- 53 努南氏症候群 Noonan Syndrome
- 54 陣發性夜間血尿症 Paroxysmal Nocturnal Hemoglobinuria
- 55 黑斑息肉症候群 Peutz Jegher
- 56 苯酮尿症 Phenylketonuria
- 57 龐貝氏症 / 肝醣儲積症第二型 Pompe Disease
- 58 小胖威利症 Prader Willi Syndrome
- 59 原發性免疫缺陷 Primary Immunodeficiency
- 60 進行性假性類風濕性骨發育不良 Progressive Pseudorheumatoid Dysplasia
- 61 肺蛋白沉積症 Pulmonary Alveolar Proteinosis
- 62 肺動脈高血壓 Pulmonary Arterial Hypertension
- 63 視網膜色素病變 Retinitis Pigmentosa
- 64 雷特氏症 Rett Syndrome
- 65 橫紋肌肉瘤 Rhabdomyosarcoma
- 66 視幹細胞營養不良 Rod-Cone Dystrophy
- 67 魯賓斯坦綜合症 Rubinstein-Taybi Syndrome
- 68 羅素 - 西弗氏症 Russell Silver Syndrome
- 69 Schaaf-Yang Syndrome
- 70 SCN8A
- 71 脊髓肌肉萎縮症 Spinal Muscular Atrophy
- 72 小腦萎縮症 Spinocerebellar Atrophy
- 73 Supernumerary Chromosome 8
- 74 高安氏症 Takayasu's Arteritis
- 75 結節性硬化症 Tuberous Sclerosis Complex
- 76 尤塞氏綜合症 Usher Syndrome
- 77 後段及全面性葡萄膜炎 Posterior uveitis/Panuveitis
- 78 內臟肌病及神經病變 Visceral Myopathy & Visceral Neuropathy
- 79 瓦登伯革氏症候群 Warrdenburg syndrome
- 80 韋氏症候群 West syndrome
- 81 威廉氏症候群 Williams Syndrome
- 82 威爾遜氏症 Wilson's Disease
- 83 Wolfram 症候群
- 84 X-連鎖無丙種球蛋白血症 X-linked Agammaglobulinemia
- 85 X-連鎖血小板減少症 X-linked Thrombocytopenia

基本資料

理事會成員

- 會長：曾建平先生（患者，退休企業主管）。
 內務副會長：方緯谷先生（患者家人，執業律師）。
 外務副會長：杜勤創先生（患者家人，傳訊經理）。
 義務秘書：曹綺雯女士（患者家人，兼職講師）。
 義務司庫：梁七根先生（患者，自由工作者）。

理事

- * 排名不分先後
 黃婉冰女士（患者，退休校長）；
 黃敏怡女士（執業社工）；
 熊德鳳女士（執業社工）；
 陳振勝教授（科學家）；
 鍾侃言醫生（臨床遺傳科醫生）；
 周權棣先生（患者家人，執業護士）；
 邵德志醫生（患者，執業醫生）；
 阮佩玲女士（患者家人，產品代理）；
 蘇潔燕女士（患者家人，社工）。

顧問

- 陳浩然教授；
 陳麗雲教授；
 車世英教授；
 許宗妮醫生；
 盛斌醫生。

秘書處成員

- 賴家衛先生（會務發展主任）；
 陳蔚斯小姐（行政主任）。

鳴謝

理事會成員；

顧問；

- 義務公關顧問 Ernest & Donald Marketing Communications Limited；
 秘書處成員及義工；
 Maggie Oriental 及所有捐款者；
 提供捐助的商界企業；
 香港視網膜病變協會。
 社會福利署 - 殘疾人士／病人自助組織資助計劃
 余兆麒殘疾人士基金資助計劃

香港罕見疾病聯盟

極昂貴藥物病人藥費分擔機制 — 「第三層安全網」

建議方案

2018年4月

前言

1. 行政長官林鄭月娥女士在 2017 年 10 月發表的施政報告中提到：「醫管局會加快檢討關愛基金項目中病人藥費分擔機制，以紓緩病人因為長期使用極度昂貴藥物而面對的財政壓力。醫管局會於 2018 年上半年完成檢討並提出改善方案。」
2. 回應是項檢討，香港罕見疾病聯盟（下稱「罕盟」）於 2017 年十月就病人藥費分擔機制提出了三個討論方案，從 2017 年 10 月中至 12 月中，面對面地諮詢了包括大學、病人團體、社福機構、商界企業、扶貧及關愛基金委員等數十個機構團體逾百位持份者，聽取了頗多獨到、精闢和具啟發性的意見和建議。罕盟於 2017 年年底草擬《極昂貴藥物病人藥費分擔機制 — 「第三層安全網」初步方案》，並於 2018 年 1 月 13 日舉辦研討會，集中聽取各方持份者的進一步建議。

在廣泛吸納罕病患者、照顧者以及社會各界持份者意見的基礎上，罕盟提出這份建議方案，期望食物及衛生局、醫院管理局以及所委聘的顧問團隊認真考慮，製訂出符合社會核心價值並有效回應民情的藥費分擔機制。

核心價值

3. 首先，制訂藥費分擔機制必須基於以下的核心價值。

第一，病有所醫。所有患病的香港市民，都應該在付費時不會經受財務困難的情況下，及時得到有效的治療。市民的健康和生命凌駕於任何人為的預設原則，包括成本效益等。

第二，能者多付。市民按其經濟承擔能力，或多或少甚至豁免分擔藥費。

第三，維持尊嚴。所有接受安全網提供藥費資助的市民，都不應以犧牲原有的合理和有尊嚴的生活質素作為代價。

4. 罕盟的建議方案，是按照現行關愛基金「資助合資格病人購買價錢極度昂貴的藥物（包括用以治療不常見疾病的藥物）」的框架（即所謂「第二層安全網」），對家庭的定義、可動用財務資源的計算、以及病人分擔比率等等加以修訂和調整，以反映社會的趨向以及蘊含有關核心價值，構建「第三層安全網」。

5. 概括而言，罕盟建議的「第三層安全網」為：

病人分擔總額 = 家庭收入分擔額 + 家庭可動用資產分擔額

家庭收入分擔額 = (每月家庭總收入 - 每月認可扣減項目) × 12 × 分擔比率

家庭可動用資產分擔額 = (可動用資產 - 可扣減豁免額) × 分擔比率

家庭的界定

6. 我們建議以單元核心家庭為計算單位。單元核心家庭的成員是：年滿 21 歲的病人及其配偶和未滿 21 歲的子女（如有）。
7. 現時香港社會保障的計算以家庭為單位，近年社會要求將之改為以個人為計算單位的訴求此起彼落，折射出香港家庭結構、供養模式以及社會文化出現巨大改變，以至數十年前確立的計算基礎不能與之相適應的不爭事實。
8. 數月來我們與持份者的討論中，如可以讓申請者選擇以個人或家庭作為計算單位，絕大部份病人表示選擇前者，主要理由是後者會破壞兩代人之間的和諧關係，嚴重窒礙年青一代向上流動。普遍而言，已成年並有收入的年青一代，即使有心亦難有經濟能力負起全數供養上一代的責任，與父母同住也許只是沒有能力負擔高昂的住屋開支而已。假如要求這些同住的子女提交收入證明及稅單等文件進行經濟審查，難免造成不和，甚至引起糾紛和家變。一些商界人士和社工也認為，從香港家庭發展的趨向考慮，以個人為單位計算藥費分擔額，比以家庭為單位更為合符情理。
9. 我們明白，如果在此時提出改以個人為計算單位，會觸及社會福利政策的根基，難以透過一年半載的社會討論得以有效處理，無法在短期內構建「第三層安全網」。
10. 我們建議以單元核心家庭為計算單位的理由是：
 - (1) 年滿 21 歲的人士，在政治、經濟、社會、文化等各方面均具有完全的自主權，具備成立家庭的法理地位和條件。
 - (2) 選擇配偶以至雙方結合是自願的行為，且受到法律約束和保障。
 - (3) 生育（或領養）子女是夫妻的承諾和承擔，有責任把子女養育到成年。

家庭收入分擔額的計算

11. 每月家庭總收入。

參照關愛基金現行做法：

不論全職、兼職、自僱或自行經營生意的全部收入，包括：薪金、花紅、雙糧獎金、酬金、佣金、小賬、各項津貼、盈利、實物利益等；

其他收入，包括：退休金、租金收入、贍養費、源自病人不同住的子女／親屬／朋友提供的定期資助、賠償金等；

香港特別行政區政府提供的經濟援助（如：鼓勵就業交通資助計劃、低收入家庭資助、公共福利金計劃內的津貼，如普通傷殘津貼、高額傷殘津貼、長者生活津貼、以及高齡津貼）及關愛基金援助項目提供的津貼，都不會被列入家庭入息之內。

12. 每月認可扣減項目。

由家庭成員所支付並用於自身的開支，包括：

- (1) 租金或按揭供款；
- (2) 病人自住物業的管理費；
- (3) 差餉／地租；
- (4) 公積金／強積金／政府推行的自願醫療保險及其他醫療保險計劃供款；

- (5) 薪俸稅；
- (6) 子女託管支出；
- (7) 21 歲以下的子女就讀大專、中學或以下級別的學費；
- (8) 為照顧病人所需的家庭傭工及其他護理開支；
- (9) 慈善捐款；
- (10) 境外探親的旅費；
- (11) 病人維生設備、交通裝置及醫療消耗品；
- (12) 家庭成員可獲得的個人豁免額；
- (13) 在公立醫院／診所就醫的醫療費用（已獲撒瑪利亞基金及／或關愛基金醫療援助項目資助的藥物費用及申請資助的藥費除外。）

個人豁免額：

人數（包括病人在內）

- 1 人 6150
- 2 人 10740
- 3 人 15290
- 4 人 19820
- 5 人 26380
- 6 人 24750
- 7 人以上 27600

13. 分擔比率。

考慮到罕病病人可能需要終生用藥，且藥物使用若干年後理應納入醫管局藥物名冊的專用藥物類別，甚或藥物專利權屆滿，因此病人分擔比率按累退計算，具體為：

- 1 至 3 年 – 10%；
- 4 至 5 年 – 8%；
- 6 至 8 年 – 5%；
- 9 至 10 年 – 2%；
- 10 年以上 – 0%。

家庭可動用資產分擔額的計算

14. 可動用資產。

計算病人及家庭成員不論全部或部分擁有、香港或香港以外地域的資產，例如：

- (1) 現金；
- (2) 透過以不同途徑的儲蓄所累積之存款；
- (3) 一筆過的賠償金；
- (4) 股票、債券及其他投資項目；

(5) 自住及非自住房業（例如土地、車位、舖位及住宅等）；

(6) 含有投資或貯蓄成份的保單（如投資連繫的保險計劃、人壽保險的紅利；但人壽保險的現金價值則不計算在內）；及

(7) 其他可兌現的資產及其他有價值的物件。

15. 可扣減豁免額。

(1) 自住房業；及

(2) 除自住房業外不超過港幣 1,000 萬元的資產值。

以上 (2) 是考慮到現時香港部份中產階層除自住房業外，還為未來的家庭計劃儲備一些資產，用於日後子女求學或退休養老等。基於不嚴重影響他們的長遠生活質素，需要為這部份資產釐定合符情理的可扣減豁免額。

16. 分擔比率。

按當年香港外匯基金淨回報率（外匯基金回報率 - 綜合消費物價指數升幅）的過去十年平均數。

外匯基金回報率反映香港官方資產的保值增值趨勢，比現時撒瑪利亞基金和關愛基金隨意訂定一個或高或低的可動用資產分擔率，更具客觀性及認受性。採用過去十年平均數會相對平穩，避免年度之間大起大落。

事實上，在以上「家庭收入分擔額」的計算中，已計入租金及盈利等資產回報。這裡再次按他們的資產值重複計算分擔額，亦是體現部份擁有較多資產的病人可付出較高的分擔額，而不會對他們的原有生活質素構成重大影響。

與「第三層安全網」相關的問題

17. 要有效構建和執行「第三層安全網」，需要處理以下問題。

- (1) 「第三層安全網」的適用範圍，亦即所謂「極昂貴藥物」的定義。我們要求當局就此提交諮詢文件，與持份者商討。
- (2) 在釐清適用範圍後，還需要確立「入網機制」，即透過什麼程序和步驟，將某一具體藥物納入「第三層安全網」，最後由關愛基金審查決定。我們要求當局就有關機制諮詢持份者，包括臨床專家和病人團體，作出具透明度的安排。
- (3) 我們的理解是：安全網只是一種權宜和過渡的安排，藥物應該按現行機制最終列入醫管局藥物名冊的專用藥物或通用藥物類別，不會無限地留在安全網。因此有需要設立「離網機制」的指引。
- (4) 構建「第三層安全網」之後，需要將之與現行安全網有機和有效銜接，相互呼應，為有需要的病人提供適合和適時的支援。這也是當局應該與持份者商議和確定的課題。

香港罕見疾病聯盟 向 2018 年施政報告提交的意見書 (2018 年 9 月)

香港罕見疾病聯盟(下稱「罕盟」)成立於 2014 年 12 月，是全港首個由跨類別罕見疾病病人和親屬組成，並得到有關專家學者支持的病人組織，旨在團結力量，共同推動改善罕病政策和服務，提升香港市民對罕見疾病的認識和病患者的支持，令罕病患者的醫療、社會支援、教育、生活等各項基本權利與其他所有市民一樣得到尊重和保障。

過去一年，罕見疾病議題在社會引起廣泛關注。在行政長官親自過問下，為個別病種提供藥物治療有所進展。然而這些「特事特辦」、「事後補鑊」等被動回應，依然不能有效全面應對罕病的挑戰，整體策略和長遠規劃乏善足陳。

罕盟自 2015 年起，每年均向行政長官施政報告及財政預算案提交意見書，陳述罕病患者的訴求，但大部分建議至今仍未得到回應。今年罕盟再次向政府反映罕病患者的需要與現行制度和政策之間的落差，要求政府優先處理三大罕病議題：

1. 確立定義
2. 遺傳診斷
3. 罕藥審批

我們還就與罕病相關的醫療和社會支援範疇提出以下訴求：

4. 「人性化」護理
5. 建立病人名冊
6. 臨床研究
7. 個案經理
8. 過渡護理
9. 暫託服務
10. 綜援機制
11. 就業輔助

各項詳述如下，期望政府聆聽和回應。

三大優先處理罕病議題

1 確立定義

現時世界上已知的罕見疾病逾 7,000 種。按立法會研究部以及國際期刊等資料，不同國家對不同罕病有不同定義，一般的界定準則每 1 萬人中少於 10 人至每 1 萬人中少於 1 人，便界定為罕病。美國 1983 年訂立的《孤兒藥品法》，當一個疾病影響少於 20 萬人，便視為罕病；歐洲的罕病定義是每 1 萬人中少於 5 人。巴西則類似世界衛生組織的界定，即每 10 萬人中少於 65 人。台灣的罕病界定準則為每 1 萬人中少於 1 人。

2018 年 5 月，國家衛生健康委員會等五個部門聯合制定了《第一批罕見病目錄》，表列 121 種罕見疾病。是以加強罕見疾病管理，提升罕見疾病診療水平及維護罕見疾病患者健康權益為出發，做好準備。其後更頒佈《罕見病目錄制訂工作程序》，當中第四條便為納入目錄的罕見疾病制定了四大條件。

據了解，由包括香港在內的二十多個經濟體組成的亞太經濟合作組織 (Asia Pacific Economic Cooperation) 將於今年 11 月提交首份亞太罕病行動計劃，呼籲亞太地區各國政府正視罕見疾病，並與包括病人組織在內的各方持份者共同制定及落實綜合性的全民罕病規劃。

2018 年 8 月，香港大學醫療研究團隊首次就本地罕病數據於國際期刊《Orphanet Journal of Rare Diseases》發表論文(見附件一)，分析過往 12 年(2005 至 2016 年)間使用公立醫院住院服務的罕病患者數據。研究發現，香港每 67 人便有 1 人患有罕見疾病，佔本港人口的 1.5%。根據 2015 至 2016 年度醫管局的住院總開支，罕病患者佔 375 億當中的 16 億，即 4.26%。

香港經濟富裕，號稱擁有完善的公共衛生體系，然而一直迴避確立罕病定義，實在令人費解。沒有定義，何來政策？若現屆政府真有決心應對罕病的挑戰，與持份者包括病人組織共議及制訂符合本地實情的罕病定義，是刻不容緩的工作。

確立罕病定義，即能從三方面帶來社會效益：

- 優化資源分配，為病人帶來更適切的治療方案；
- 精準醫療配對，減少資源浪費；
- 提高罕病認知，營造社會關愛風氣。

2 遺傳診斷

八成罕見病與遺傳基因缺陷有關。為了一個答案，有些患者磋砣十年以上方能確診，主要原因是香港嚴重欠缺遺傳診斷和檢測的專門人才和軟硬件。

據聞香港兒科專科學院將設立「遺傳學及基因組學」分科，並將由資深的本地遺傳科醫生帶領下，培育更多人才，逐步充實臨床遺傳科團隊，以滿足殷切的需求。

然而作為全港最大公共衛生服務提供者的醫院管理局，至今仍未設立臨床遺傳職系，例如顧問醫生、駐院醫生、遺傳諮詢師等等。即使未來幾年培育出一批臨床遺傳科專才，如果仍不開設相應的職位吸納，遺傳診斷服務依然不可能大幅增加以回應患者的需求。

除了人力資源外，檢測器材和實驗室等配置也需同步重視。現時不少患者正因人力和設施的不足，需長時間輪候化驗結果，延誤確診，耽誤治療黃金期。

近年基因檢測技術飛躍發展，內地在設計及生產篩檢器材取得相當突破，結合雲端和大數據整合的技術，已能提供價格相宜、高水平的檢測，也刺激了不少本地檢驗公司，提供大眾化服務。

針對現況以及長遠需求，罕盟建議：

- 在醫院管理局設立臨床遺傳專科人力體系，應對診斷和治療罕病的未滿足需求；
- 為縮短輪候期偏長的檢測項目，以公私營協作模式，委托本地或外地檢測機構檢驗，費用由醫院管理局負責；
- 加強罕見疾病公眾教育，鼓勵父母為新生兒進行罕見病基因篩查；
- 建立完善罕見病遺傳諮詢服務、為受罕見遺傳病影響的家庭提供資訊和協助。

3 罕藥審批

罕病藥物的審批制度是現時本地病人獲取治療的重大障礙。醫院管理局繁複而漫長且欠人性化的藥物審批制度，加上以「成本效益」凌駕病人的健康和生命的思維範式，以及無視罕病個案稀少和長期療效數據不多的客觀事實，令罕病用藥極難在現有機制下短時間內通過審批，嚴重妨礙患者及早獲得治療。

另外醫管局一直以「病人參與存在利益衝突」等為藉口，極力排拒病人參與藥物審批。然而現時不少病友已有能力了解疾病藥物訊息，提供臨床療效評估以外的實證，這些數據亦已在其他國家或地區的藥物審批時得到正視及考慮。

就罕藥審批制度，罕盟建議：

- 增設罕藥審批機制，無須經由醫管局「藥事建議委員會」(DAC) 等固有程序，改由具相關臨床經驗的專家小組評審罕病藥物，以病人的生命和健康作為凌駕性考慮，加快審批過程；
- 邀請病人組織代表參與審批過程，讓他們提供醫療專家評估之外的實證，例如患者及照顧者的生活質素、情緒變化、社會參與等數據；
- 向個案患者及病人組織詳細講解審批小組的決定和理據，以及跟進方案。
- 與罕病相關的醫療和社會支援訴求

4 「人性化」護理

部分罕見病患者因病情嚴重，需要貼身照顧。當中不乏長期於公立醫院留醫的病友，對前線醫護人員構成一定壓力，特別於病房人手短缺的日子，貼身照顧只怕是「不可能的任務」。

照顧者比醫護人員更加了解患者的生活習慣、喜惡、甚至病發先兆，有能力分擔病房前線的壓力。但現實是他們受「探病時間」所限，大大局限了他們的功能，也變相加大了醫護人員的壓力。

罕盟建議：

- 增加病房「探病安排」的彈性，以證件或登記等方式識別有罕病照顧者，允許照顧者在病房逗留更長時間。
- 為罕病照顧者提供短期「留宿房間」或「留宿安排」，以人性化角度提升照顧水平，同時維繫患者與照顧者的關係，促進身心健康。

5 建立病人名冊

良好的醫療服務和診斷，有賴紀錄遺傳信息及發病率等的準確方法，建立患者名冊 (Patient Registry)，無疑是處理罕見疾病必不可少的工作。整合和完整的患者名冊，積累罕病診斷和治療成效的恰當經驗，是標準公共衛生政策的重要部份；名冊也有助臨床試驗以及其他涉及病人的研究，為臨床和病人帶來長遠的改善。

就長遠規劃及妥善投放資源，罕盟建議：

- 由兒童醫院牽頭，協調兩家醫學院及各家醫院，選擇若干罕病種類，展開罕病患者名冊的先導計劃，並透過大數據以制訂長遠防治罕病方針；
- 有效利用電子健康紀錄共享平台，逐步建立全面的罕病患者名冊。

6 臨床研究

政府現有一些鼓勵醫學研究的基金，例如醫療衛生研究基金 (Health and Medical Research Fund, HMRF)，但因對案例和數據的要求門檻與常見病看齊，完全不能回應本地罕藥臨床研究的需要。

因應「資助合資格病人購買價錢極昂貴的藥物（包括用以治療不常見疾病的藥物）」等措施實行，預期本地用藥種類、用藥個案等將陸續增加，所得出的本地臨床數據將有巨大參考價值，實在值得醫學界仔細研究，增加學術界對罕病以及罕藥的認識和了解。

就臨床研究，罕盟建議：

- 設立罕病用藥臨床研究專項撥款，爭取香港成為相關藥物研發的試點。鼓勵和方便兩家醫學院及醫院管理局進行罕病用藥臨床試驗，積累本地臨床實證數據。
- 蒐集已在本地使用罕藥的患者的用藥數據，作深入研究及分析。並對具有卓越成效的藥物，作為專用藥物納入藥物名冊。

7 個案經理

罕病患者求診覆診，往往要遊走多個專科，小則數科，多則十數科；他們還需要復康、與生活起居相關的各類社區支援等。種種繁複步驟和流程，困擾著無數罕病家庭的日常生活。

因此罕盟建議設立「罕病患者全人個案經理」項目，內容如下：

- 試行並逐步推廣「罕病患者全人個案經理」服務，負責罕病患者（不論長幼）的全人支援需要，由醫療、覆診、復康、求學、就業、婚姻、社區生活支援以至精神健康等範疇提供協助，並製作相關指引，讓前線的個案經理有所依從，妥善執行。
- 罕病患者全人個案經理的主要職責是：評估患者及家庭的醫療及社會支援需要；安排及統籌協調各項跨部門跨專業的社會支援服務；跟進及檢討服務成效，並因應患者需要的變化而作出服務調整。

社會福利署在 2016 年 9 月公布了《個案管理服務手冊》，罕盟建議當局以此作藍本，因應罕病患者的需要作出優化，早日試行並推廣「罕病患者全人個案經理」服務。罕盟樂意就此提供資料及具體意見。

8 過渡護理

很多罕見病患者在兒童時期開始病發，由兒科醫生照顧，當他們年滿 21 歲，便需轉往成人病房或轉介其他專科覆診。現時一般成人病房的醫生較少接觸罕病，缺少照顧罕見病患者的經驗，處理罕病個案會有難度。

部分兒科醫生見狀不敢貿然轉介，繼而產生「患者超齡」的現象，此舉無疑增加了他們的工作負擔，卻充份反映當前醫療系統無法妥善照料這群罕病患者的需要。

就過渡護理，罕盟建議：

- 加強對罕見疾病患者「過渡護理」的重視，促進具罕病經驗的兒科醫生與成人科醫生的交流，保障順利「過渡」，患者不會因銜接問題而使無法取得適切照料。
- 培訓前線醫生認識罕見疾病，增設職系以吸引人才，應對長遠罕病患者需求。

9 暫托服務

因罕病而致身體及智能缺損的青少年患者，一般被安排在特殊學校，不一定有宿位留宿；離開特殊學校之後，需要輪候大約六年才能進入殘疾院舍。這些患者在家居的日常生活，通常由家長或照顧者照顧，但由於他們需要輪班、出門以至本身因病入院等等，不一定可以每天二十四小時每星期七天在家居照顧罕病孩子。

社會福利署近年推出家居暫托服務，在一定程度上回應了罕病照顧者的需要。不過這項服務依然與照顧者的需要存在落差，例如須提前一個月以上預約、每天服務時間只由上午八時至下午六時、家居照顧員沒有能力應付罕病患者的緊急狀況等等，有待優化。

就家居暫托服務，罕盟建議：

- 除一般預約排期外，增設臨時緊急預約，回應照顧者因突發情況需要即時暫托服務。
- 暫托服務時間增加至每天二十四小時，每星期七天，令家長或照顧者在夜間及節假日無法抽身也不會有後顧之憂。
- 提昇家居照顧員的處理緊急狀況能力，例如患者抽搐及呼吸急促時，能夠在救護車到達前即時施以急救。

10 綜援機制

罕病患者除了衣、食、住、行等基本開支外，持續醫療及維生醫療儀器開支，更是他們延續生命而不能節省的經濟重擔，動輒每月數千甚至數萬元以上。在無力負擔的情況下，不少罕病患者只好申領綜援，在安全網報銷維生開支。

按現時綜援制度，罕病患者必須以家庭作為申請單位，且同住的直系親屬均需申報資產，遵從綜援條例安排領取援助金。在此規限下，罕病患者不得以個人身份獨立申領綜援，同住的家庭成員亦因綜援入息上限而不得就業，既嚴重影響家庭收入，亦增加社會福利開支。有些罕病患者為避免家人受到負累，不得不申請調遷或進入院舍，被迫捨棄家庭團聚的權利，以換取申領個人綜援的資格，繼續取得維生所需開支延緩生命，突顯現行欠人性化的綜援申領制度凌駕罕病患者的社會支援需要，無視罕病患者社區生活的選擇權利。

就綜援機制，罕盟建議：

- 容許年滿 21 歲的罕病患者在與家人同住的情況下，以獨立身份申領綜援；在不需凍結其他家庭成員的經濟水平及應有生產力的同時，解決罕病患者延續生命所需的維生開支。

11 就業輔助

隨著教育普及，罕病患者普遍都接受中小學教育，部份更完成大專以上程度學業。他們有志投身社會工作，自給自足，充實人生。奈何週邊醫療維生儀器及輔助器材等開銷龐大，壓抑了他們的就業動機。一些大型器材如：醫療床、特製床墊、輪椅、抽痰機、呼吸機等器材，一般數年便需更換。一旦他們從工作中賺取收入，便不符合申領各項維生及輔助器材津助的入息門檻。坊間慈善基金申請需時，輪候人士眾多。在別無選擇下，他們為了生存所需的醫療維生設備，只能放棄就業，被困在綜援網不能自拔。

就改善罕病患者的就業環境、鼓勵就業，罕盟建議：

- 設立「醫療維生儀器及輔助器材資助計劃」，為正在就業但未能負擔醫療維生設備及輔助器材開支的罕病患者，提供適切的支援，緩解他們在恆常醫療維生開銷上的難題，提供誘因鼓勵他們就業。
- 為身處綜援網以外且正在就業，並有長期醫療需要人士，提供中途計劃，取得額外補貼，鼓勵他們投入就業市場，持續就業。

Written Submission to the HKSAR Government in response to the Public Consultation for the 2018 Policy Address Hong Kong Alliance for Rare Diseases (September 2018)

The Hong Kong Alliance for Rare Diseases (hereinafter "HKARD"), established in December 2014, is the first patients' group in Hong Kong comprising cross-rare disease patients and their families with the support of experts and academics in the field. Its objectives are to spearhead and improve related policies and services, promote public education on rare diseases, and strengthen the community's support for patients, in order to ensure respect and protection for patients in terms of such fundamental rights as healthcare, social support, education, and daily needs equal to other citizens.

Rare disease-related issues have received community-wide attention over the past year. Since the Chief Executive personally took up the matter, progress has been made in the provision of drugs and treatment for individual rare disease cases. However, such passive responses aiming to make "special arrangements" or to "patch things up afterwards" are still ineffective to fully address the challenge of rare diseases while overall strategy and long-term planning remain lacklustre.

Since 2015 HKARD has written submissions for the Policy Address consultation to put forward rare disease patients' demands, but has yet to receive any response regarding most of our recommendations. This year, apart from reflecting yet again the gap between patients' needs on the one hand and existing systems and policies on the other hand, we urge the Government to give priority to the following three rare disease-related issues:

1. Establishment of Official Definition of Rare Diseases
2. Genetic Diagnosis
3. Approval for Rare Disease Drugs

With regard to healthcare and social support for rare diseases, we appeal for urgent action in the following areas:

4. People-centred Care
5. Development of Patient Registry
6. Clinical Research
7. Case Managers
8. Transitional Care
9. Respite Services
10. Comprehensive Social Security Assistance (CSSA) Scheme
11. Employment Assistance

Details of our requests are furnished below. We hope the Government will listen and respond to us.

Three Highest-priority Issues in Rare diseases

1 Establishment of Official Definition of Rare Diseases

There are over 7,000 known rare diseases in the world. According to the data compiled by the Legislative Council Secretariat's Research Office and international journals, different countries have different definitions of rare diseases. The general yardstick is that a disease is defined as rare if the number of patients ranges from fewer than 10 in 10,000 persons to fewer than one in 10,000 persons. In accordance with the Orphan Drug Act of 1983 in the US, a rare disease affects fewer than one in 200,000 persons while in Europe, a disease is defined as rare when it affects fewer than five in 10,000 persons. Similar to World Health Organization's definition, a rare disease in Brazil affects fewer than 65 in 100,000 persons while it is fewer than one in 10,000 persons in Taiwan.

In May 2018, the National Health Commission, in conjunction with four other government departments, developed the "The First Batch of Rare Disease List", including 121 types of rare diseases with a view to gearing up for enhanced management, diagnosis and treatment of such diseases, and for better protection of the health interests of patients. Subsequently "Guidelines for Rare Disease List" was subsequently issued, in which four criteria are set for rare diseases incorporated into the List.

It has been reported that in November 2018, the Asia Pacific Economic Cooperation, which comprises over 20 economies including Hong Kong, will submit its first action plan on rare diseases. The aim is to call on governments in the region to formally address rare diseases and join hands with stakeholders including patient groups to draw up and implement a comprehensive national rare disease programme.

In August 2018, a medical research team of The University of Hong Kong (HKU) published for the first time a paper on rare disease data in the international journal Orphanet Journal of Rare Diseases, analysing data of rare disease patients using in-patient service at public hospitals from 2005 to 2016 (see Appendix 1). As shown by the research findings, rare diseases affected one in 67 persons in Hong Kong, representing 1.5% of the local population. Of the Hospital Authority's expenditure totalling \$37.5 billion in 2015-16, rare disease patients accounted for \$1.6 billion (or 4.26%).

Given the prosperity of Hong Kong and its reputedly well-established public healthcare system, it boggles the mind why the issue of an official definition of rare diseases has been skirted. How can there be a policy in the absence of a definition? If the current SAR administration is truly determined to address the challenge of rare diseases, it should immediately consult with such stakeholders as patient groups to devise a definition of rare diseases suitable for the local situation.

Three ways the community will benefit from the establishment of an official rare disease definition:

- optimization of resource allocation to offer appropriate treatment options to patients;
- precise healthcare matching to minimize waste of resources;
- greater awareness of rare diseases to foster community spirit.

2 Genetic Diagnosis

80% of rare diseases are related to genetic defects. Owing to a serious shortage of genetic diagnostic and testing professionals as well as hardware and software, it may take up to 10 years or more for some patients to get a definite diagnosis.

It has been reported that the Hong Kong College of Paediatricians will launch a genetics and genomics service and, under the leadership of seasoned clinical geneticists, will nurture professionals to build a team of clinical geneticists.

However, as the primary public healthcare service provider in Hong Kong, the Hospital Authority has yet to establish genetics and genomics ranks, such as consultant, resident, genetic counsellor, etc. Even if a group of expert clinical geneticists will be available after training in a few years, without relevant job openings, it will still be unlikely to significantly increase genetic diagnostic services to meet patients' needs.

Apart from human capital, equal emphasis should be given to the provision of testing equipment and laboratories. Delays in diagnosis and failure to seize the golden opportunity for treatment can indeed be put down to inadequate manpower and facilities, leading to long waits for test results.

In recent years, with a quantum leap forward in genetic testing technology, mainland China has achieved significant breakthroughs in the design and production of screening equipment. Integrating cloud and big-data technologies, it has become possible to provide high-level testing services at reasonable costs on the mainland, prompting many testing organizations in Hong Kong to offer affordable services.

HKARD would like to make the following suggestions in regard to the current situation and long-term needs of Hong Kong:

- The Hospital Authority should establish clinical genetics and genomics ranks to address unmet demands for rare disease diagnosis and treatment;
- Through public-private collaboration, the Hospital Authority should bear the costs of commissioning testing by local or foreign testing organizations to shorten waiting time for test results;
- To strengthen public education on rare diseases and encourage parents to arrange genetic screening of their newborn babies for rare diseases;
- To set up comprehensive genetic counselling services for rare diseases to offer information and assistance to families affected by rare genetic diseases.

3 Approval for Rare Disease Drugs

Currently the drug approval system is a major obstacle to treatment for rare disease patients. Under the Hospital Authority, the system involves complex and time-consuming processes which go against people-centred principles. Coupled with a "cost-effectiveness over patients" mindset and disregard for the fact that rare disease cases are sporadic by nature and data of long-term treatment effects for rare diseases is limited, this has made the approval process for rare disease drugs even less likely to be efficiently completed. These are the formidable hurdles to timely treatment for rare disease patients.

Moreover, the Hospital Authority has been using "conflict of interest inherent in patient participation" as an excuse to prevent patients from participating in the drug approval process. However, many patients have developed an adequate understanding of drug information, which provides hard evidence in addition to clinical assessment of drug efficacy. In other countries, such data has already been given due attention and consideration during the approval process.

HKARD would like to make the following suggestions in regard to the drug approval system for rare diseases:

- To introduce an additional mechanism for approval of rare disease drugs. Instead of going through such process as the Drug Advisory Committee under the Hospital Authority, it will be advisable to put a panel of experts with relevant clinical experience in charge, giving overriding consideration to the lives and health of patients so as to expedite the approval process.
- To invite representatives from patient groups to participate in the approval process so that, in addition to assessment by medical experts, they can provide evidence through data, for instance, life quality of patients and carers, mood changes, and social participation;
- To explain in detail to patients and patient groups the decisions and rationales of the approval panel and follow-up options.

Appeal for Medical and social support in relation to rare diseases

4 People-centred Care

Seriously ill rare disease patients call for attentive care. Since they include long-term patients in public hospitals, this will put extra pressure on front-line healthcare personnel, making attentive care a particularly "daunting task" when hospital wards are understaffed.

Carers understand better patients' daily habits, likes and dislikes, or even the outbreak signs and should be able to share the burden of front-line personnel. However, their role is greatly diminished by limited visiting hours, effectively putting more pressure on healthcare personnel.

HKARD would like to make the following suggestions:

- To increase flexibility of hospital-ward visiting arrangements by allowing rare disease carers to stay longer in wards through an identification or registration procedure.
- To provide sleep-in rooms or sleep-in arrangements for rare disease carers. Such a people-centred approach will be beneficial to the level of care and the health of patients and carers by keeping their relationships close.

5 Development of Patient Registry

Since excellence in healthcare and diagnosis depends on accurate means of recording genetic information and the rate of disease outbreak, developing a patient registry is essential to handling rare diseases. An integrated and comprehensive patient registry collating pertinent experiences in rare disease diagnosis and treatment constitute a crucial part of standard public health policy. A patient registry is also conducive to clinical tests and other patient-related studies, bringing long-term improvements to clinical and patient conditions.

HKARD would like to make the following suggestions in regard to long-term planning and optimal resource allocation:

- To roll out a patient registry pilot scheme on a selection of rare diseases led by Hong Kong Children's Hospital in coordination with the two medical faculties respectively operated by HKU and The Chinese University of Hong Kong as well as various hospitals. Also, to devise a long-term approach for prevention and treatment of rare diseases via big data.
- To progressively develop a comprehensive rare disease patient registry by making effective use of the electronic health record (eHR) sharing platform.

6 Clinical Research

The Government has made available funds, e.g. Health and Medical Research Fund, in support of medical research. However, such efforts have proved ineffective at meeting local clinical research needs of rare diseases as the case and data requirements are the same as those for common diseases.

As a result of the implementation of an assistance programme to provide eligible patients with subsidies for the purchase of ultra-expensive drugs (including those for treating uncommon diseases) and other similar measures, both the types and cases of drugs used in Hong Kong are expected to increase. The clinical data gathered in the process will be most valuable to further study by the medical profession and conducive to enhancing understanding of rare diseases and rare disease drugs in academia.

HKARD would like to make the following suggestions in regard to clinical research:

- To provide earmarked funding for rare disease clinical research and strive to position Hong Kong as a R & D testing ground for rare disease drugs. This will facilitate clinical tests of rare disease drugs by the two university faculties of medicine and development of evidence-based clinical data in Hong Kong.
- To collate medication data of local patients taking rare disease drugs for in-depth research and analysis in addition to listing high-efficacy drugs as special drugs in the Drug Formulary.

7 Case Managers

Rare disease patients require all kinds of social support when it comes to medical consultation, follow-up consultation, rehabilitation, and other daily needs. All the complex procedures and sequences are the cross to bear for patients and their families. They are likely to go back and forth between at least several if not a dozen specialists at the hospital.

HKARD would like to make the following suggestions in regard to "Rare disease Patient Whole-person Case Managers":

- To pilot and promote in stages a "Rare disease Patient Whole-person Case Manager" service to take care of patients' whole-person support needs (for adults and children alike) in terms of healthcare, follow-up consultation, rehabilitation, schooling, employment, marriage, community life, and mental health, and to produce relevant guidelines for proper implementation by front-line Case Managers.
- The main responsibilities of Rare disease Patient Whole-person Case Manager are: evaluating the medical and social support needs of patients and their families; arranging and coordinating various interdepartmental and cross-professional social support services; following up on and reviewing service results; and making service adjustments in line with changing needs of patients.

In September 2016, the Social Welfare Department launched the Handbook on Case Management Service. HKARD suggests that the Government should use this as a blueprint and, after optimizing it based on patients' needs, pilot the proposed "Rare disease Patient Whole-person Case Manager" service as soon as possible. HKARD should be glad to provide further information and specific suggestions in this respect.

8 Transitional Care

Many rare disease patients first received treatment in their childhood by paediatricians. Once they reach the age of 21, they often find themselves transferred to adult wards or referred to other specialists for follow-up consultation. In general, doctors in adult wards have difficulty in treating rare disease patients since they have less exposure to rare disease cases and therefore lack experience in treating these patients.

In view of the above phenomenon, some paediatricians are deterred from referring their patients to other specialists. As a result, more and more "overage patients" are in their care, which creates a heavy workload for them. This is yet another example of how rare disease patients are shortchanged under the present healthcare system.

HKARD would like to make the following suggestions in regard to transitional care:

- To attach more importance to transitional care. Ensure smooth transition of care by facilitating communication between paediatricians experienced in treating rare diseases and doctors in adult wards, so that transitional issues will not cause patients to be denied proper care.
- To familiarize front-line doctors with rare diseases through training. Establish more medical ranks to attract healthcare professionals with a view to meeting the needs of rare disease patients on a long-term basis.

9 Respite Services

Young patients with physical or mental disabilities resulting from rare diseases are usually referred to special schools, which do not always provide hostel accommodation. After leaving the schools, typically they have to wait around six years before being admitted to residential care homes for persons with disabilities. Owing to their own work shifts, travel plans or even hospitalization due to illness, parents or carers may not be on hand to attend to rare disease patients' daily needs at home all the time.

The home-care service launched by the Social Welfare Department in recent years serves to address the needs of rare disease patients' carers to a degree. Still the service falls short in a number of ways. For example, it is necessary to book one month in advance, daily service hours are limited to 8 a.m. to 6 p.m., and home workers are not in a position to help rare disease patients with emergency situations, etc. These are some of the areas that remain to be optimized.

HKARD would like to make the following suggestions in regard to home respite services:

- In addition to general appointments, introduce contingency appointments for respite services at short notice to take the place of carers in case of emergency.
- To provide round-the-clock services seven days a week to ease the burden of parents and carers who are unavailable to help at night or during holidays.
- To improve carers' emergency handling skills, e.g. the ability to administer first aid to a patient suffering muscle spasms and shortness of breath before ambulance arrival.

10 Comprehensive Social Security Assistance (CSSA) Scheme

Apart from expenses for basic needs, long-term medical equipment and life-support medical equipment – which easily cost thousands or even tens of thousands of dollars per month – form another economic burden around patients' necks. This is often the last straw that leaves patients no choice but to apply for CSSA, causing them to rely on the safety net to offset their life-saving expenses.

Under the present requirements of the CSSA Scheme, not only must patients submit their applications on a family basis, all the immediate family members living together are also subject to an asset test, and receive payments in accordance with the CSSA Scheme provisions. In other words, patients cannot apply for the Scheme individually and family members living together are discouraged from working because of the income limit. While seriously affecting family income, this will put the social welfare expenditure under further strain. To avoid compromising their families, patients are forced to file transfer applications or move to residential care homes. To cover their life-saving expenses, they have no choice but to trade their right to live with their families for the eligibility for CSSA. This goes to show how the rigid application procedures ride roughshod over the social needs of rare disease patients without regard to their right to community-life choices.

HKARD would like to make the following suggestion in regard to the CSSA Scheme:

- To allow patients living with their families to apply for CSSA individually. This will solve rare disease patients' problem of life-saving expenses without compromising their families' living standards and potential productivity.

11 Employment Assistance

With increasing access to education, most rare disease patients have graduated from secondary school. Some of them may even have completed tertiary or a higher level of education. They would have been motivated to get a job to support themselves and live independently had they not been bogged down by the huge expenses on life-support equipment and assistive devices. Large equipment such as medical bed, custom-made mattress, wheelchair, suction machine, and ventilator, etc., normally needs to be replaced within a few years. Wages earned from employment will likely exceed the income limit for medical equipment subsidies. As for charitable funds in the community, the time-consuming application process and long list of applicants simply become too prohibitive. To secure subsidy for the essential life-support equipment, patients have no choice but to give up employment and hang desperately on to the CSSA safety net.

HKARD would like to make the following suggestions in regard to improved employment conditions and employment incentives for rare disease patients:

- To set up a "Life-support Equipment and Assistive Device Subsidy Scheme" to render proper support to rare disease patients who are employed but are unable to afford the equipment and devices. Such an initiative will help to reduce their recurrent expenditure in this respect and provide them with an employment incentive.
- To put in place intermediate measures for those who fall outside the CSSA safety net and have long-term healthcare needs. With extra subsidies, they will be encouraged to enter the job market and stay employed.



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