



COLLEGE OF PUBLIC HEALTH
UNIVERSITY OF THE PHILIPPINES MANILA
SEAMEO-TropMed Philippines Regional Center for Public Health,
Hospital Administration, Environmental and Occupational Health



Position Paper

On the proposed amendment to Act 3573,
“An Act Providing For the Prevention and Suppression
of Dangerous Communicable Diseases, and for Other Purposes.”

The College of Public Health of the University of the Philippines Manila, the Regional Center for Public Health, Hospital Administration, Environmental and Occupational Health of the Southeast Asian Ministers of Education-Tropical Medicine and Public Health Network (SEAMEO-TropMed), *affirms the need to amend Act 3573*. This is in line with the need *to consolidate the authority of the Department of Health to mandate all facilities, centers, ports of entry and conveyances, both public or private, to report and appropriately manage notifiable diseases and other health-related events of public health significance*. We laud the initiative of the lawmakers from the Senate and the House of Representatives in proposing legislation to update the Act.

After discussion on the contents of the bill, we would like to respectfully relay these concerns to the committees tasked to act on the bills:

- *Feedback and referral mechanisms should be flexible* enough so as to enable facilities to decide which level of healthcare should receive referred patients diagnosed with notifiable diseases, based on the service capacity of the destination unit.
- *The information system for infectious disease surveillance should be integrated with other health information systems*, to facilitate reporting and appropriate action, prevent overlaps in data entry, and ensure accuracy. It should also subsume all reporting systems currently in place, for consistency and ease of deployment to all levels of healthcare.
- *Duties, responsibilities and lines of accountability* in the national, regional, provincial, city/municipal and barangay *levels of government* should be well-defined. Likewise, duties and responsibilities must also be developed for the *private sector*, specifically for private health facilities, free-standing clinics and laboratories, workplaces, transport and public conveyances, and other potential venues in which contagious notifiable diseases may be spread. *Agencies that will enforce these duties*, responsibilities and lines of accountability must also be identified.
- *Points of integration of the DOH and local government health systems with other government agencies and the private sector* should be considered in reporting notifiable diseases and mandating appropriate action.
- There should be *capacity building and identified funding sources* to enable epidemiology and surveillance units (ESUs) to appropriately manage, or refer if needed, patients diagnosed with notifiable diseases.
- *Maintenance of communication infrastructure* must be ensured by the government agencies mandated to carry out such functions.
- *Risk communication* protocols should be in place to inform policy-makers, other practitioners and stakeholders, mass media, and the general public on developments when a state of public health emergency is in force or when an epidemic or similar health event is

declared, while preventing irresponsible use of information that may affect public trust of the health sector.

We earnestly hope that these concerns will be considered in developing the final version of the proposed legislation, and that the College of Public Health and the rest of the University will be consulted in developing implementing rules and regulations.

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