MINISTRY OF HEALTH
SINGAPORE

Consumer Guide on the Moratorium on Genetic Testing and Insurance

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Key Takeaways

- *Genetic testing helps to predict health risks, diagnose diseases, and adopt healthier lifestyles to reduce the risks of diseases.*
- *The Moratorium on Genetic Testing and Insurance applies to all insurers in Singapore.*
  - *Insurers cannot pressure you to take genetic tests as a condition for purchasing insurance.*
  - *Insurers cannot request or use predictive genetic test results except in limited cases.*
- *Your family history and diagnosis of conditions may still be requested by insurers.*

INTRODUCTION TO GENETIC TESTING

A genetic test is a test that analyses a person's DNA[1], RNA, chromosomes, or specific genes to identify changes (also known as variants). These changes may be linked to certain inherited conditions, risk of developing certain diseases, or ability to pass on genetic conditions to their children. Genetic testing supports targeted prevention and health promotion by allowing for:

- Early detection of inherited risks before symptoms develop
- Reduction of late-stage chronic diseases
- Faster and more accurate diagnosis of diseases
- Personalised medical care to effectively treat diseases
- Adopt healthier lifestyles to reduce the risks of diseases

Genetic testing can be categorised into **clinical** and **non-clinical** genetic testing

[1] *Deoxyribonucleic acid (DNA) and ribonucleic acid (RNA) are types of nucleic acids that store and transmit genetic information in living organisms.*



Clinical

Clinical genetic testing is used for medical purposes. It can help:

- Confirm or rule out a genetic disease in someone who already has symptoms[2];
- Predict if someone is at risk of passing a genetic condition to their children;
- Predict future risk of developing a genetic condition in someone who currently has no symptoms[3];
- Guide doctors in choosing the right medication and dosage that may be most effective and beneficial for the person;
- Guide people on adopting healthier lifestyles to reduce the risks of developing a disease; or
- Detect or predict a genetic condition in a foetus during pregnancy.

Important note

Clinical genetic testing can provide different types of information depending on whether it is used to predict future risk (**predictive** genetic testing) or to confirm a diagnosis (**diagnostic** genetic testing). This distinction is important, as it affects how test results are interpreted by healthcare professionals and how they are treated under the Moratorium. For example:

- Genetic test for Huntington's disease (HTT) done in a person with existing symptoms (e.g., involuntary jerking or writhing movements) or atypical test results (e.g., magnetic resonance imaging changes) would be considered diagnostic as the genetic test confirms the diagnosis of the disease.

- Genetic test done in a person with no signs or symptoms of Huntington's disease would be considered predictive as the genetic test predicts that the person may develop the disease in the future.

Non-clinical

Non-clinical genetic testing is not used for medical diagnosis or treatment. Examples include genetic tests that provide information about:

- an individual's relatedness to a certain ancestor or ancestral group and/or how much of an individual's genome is likely to have been inherited from ancestors from particular geographical areas or ethnic groups (ancestry testing);

- an individual's behavioural propensities or talents, performance capacity (physical or cognitive), or response to certain environmental conditions (e.g., stress) (innate behavioural/lifestyle testing); or

- an individual's response to certain diets (nutrigenomics testing).



Important note

Some Direct-to-Consumer (DTC) genetic tests could have medical implications e.g., a DTC genetic test offered for general wellness but includes assessment about the genetic risks of medical conditions. Consumers should exercise caution and consult a registered medical practitioner for advice.

[2] A symptomatic individual is a person who has observable or detectable signs and symptoms associated with a disease or condition.

[3] An asymptomatic individual is a person who does not have observable or detectable signs and symptoms associated with a disease or condition.

MORATORIUM ON GENETIC TESTING AND INSURANCE



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

The Moratorium **protects certain genetic test results from use by insurers in underwriting**, so that you have greater assurance when undergoing clinical genetic testing for medical care or participating in precision medicine. It applies to all LIA members that includes life insurers and reinsurers that are licensed to operate in Singapore.



Key Protections of the Moratorium

Please see Annex A for a summary of the protections.

(a)

If you have never taken a genetic test, insurers cannot require or pressure you (directly or indirectly) to do so for insurance underwriting. This applies to ALL genetic tests, including diagnostic, predictive, pharmacogenetic or prenatal and newborn screening genetic tests.

New under the 2025 Moratorium

(b)

If you have undergone genetic testing conducted under the National Familial Hypercholesterolaemia (FH) Genetic Testing Programme, insurers are prohibited from requesting for and/or using your FH genetic test results (both diagnostic and predictive) in insurance underwriting.[4]

(c)

If you have previously taken a genetic test, insurers cannot request and/or use your genetic test results in insurance underwriting (including health insurance, integrated shield plan, general insurance, group insurance and others), unless:

- If the test was a **diagnostic** genetic test (confirming a diagnosis), insurers can request this as part of your medical history; or
- If you are applying for (i) life, (ii) total permanent disability (TPD), (iii) long-term care (LTC), (iv) critical illness (CI), or (v) disability income insurance, insurers may request for your predictive genetic tests only if **both conditions** below are met:
  - ✓ The sum assured/pay-out you are applying for is higher than the **Approved Financial Limit** set out in the Moratorium; and
  - ✓ The predictive genetic test you took is one of the **Approved Predictive Genetic Test** set out in the Moratorium (i.e., HTT genetic test for Huntington's disease and BRCA1/2 genetic test for breast cancer).

Please see Table 1 for more information.

(d)

The Moratorium does not affect the Insurers' ability to request and/or use diagnosis or family history as per current industry practice. For example, if the doctor diagnoses you with FH based on clinical examination and/or genetic tests, insurers may request for the disclosure of the diagnosis.

[4] If you take FH genetic testing outside of the National FH Genetic Testing Programme, insurers cannot request for predictive genetic test results but may request diagnostic genetic test results.

TABLE 1: CONDITIONS WHICH MUST BE MET BEFORE INSURERS CAN REQUEST FOR PREDICTIVE GENETIC TEST RESULTS

Approved Insurance Type	CONDITION 1 Above the Approved Financial Limit of (SGD) (aggregated per life basis)	CONDITION 2 Approved Predictive Genetic Test
Life	$2,000,000 Sum Assured	Huntington's Disease (HTT)
Total Permanent Disability (TPD)	$2,000,000 Sum Assured	
Long-Term Care (LTC) (≥2 ADLs[5])	$3,000 Per Month	
LTC (1 ADL)	$3,000 Per Month	Huntington's Disease (HTT) Breast Cancer (BRCA1) Breast Cancer (BRCA2)
Critical Illness (CI)	$500,000 Sum Assured	
Diability Income (DI)	$10,000 Per Month	

For additional clarification on the Moratorium, please refer to Annexes B and C, which contain case scenarios and frequently asked questions.

[5] *"Activities of Daily Living" or "ADL" means a set of activities such as (i) bathing or washing, (ii) dressing, (iii) feeding, (iv) transferring, (v) mobility and (vi) toileting.*



ANNEX

ANNEX A: SUMMARY OF TYPES OF GENETIC TEST / INFORMATION AND USE BY INSURERS

Type of Genetic Test / Information	**Individual:** Can insurers use my test result / information?	**Family members:** Can insurers use my test result / information?
Direct To Consumer genetic test	No	No
Genetic test done as part of biomedical research		
FH genetic tests conducted under the national FH genetic testing programme		
Predictive genetic test	No, unless both conditions in the Moratorium are met: i. Sum assured/pay-out you are applying for is higher than the **Approved Financial Limit** set out in the Moratorium; and ii. Predictive genetic test you took is one of the **Approved Predictive Genetic Test** set out in the Moratorium (i.e., HTT genetic test for Huntington's disease and BRCA1/2 genetic test for breast cancer).	No
Diagnostic genetic test	Yes, however insurers are prohibited from requiring or pressuring an individual (directly or indirectly) to undertake a diagnostic genetic test as a pre-condition for insurance underwriting.	Yes, however insurers are prohibited from requiring or pressuring an individual (directly or indirectly) to undertake a diagnostic genetic test as a pre-condition for insurance underwriting.
Pre-implantation genetic diagnosis (PGD)[6], prenatal or newborn genetic screening for congenital diseases		
Family history	Yes	Yes

[6] *Pre-implantation Genetic Diagnosis (PGD) refers to genetic testing performed on early embryos created during in vitro fertilisation prior to implantation.*

ANNEX B: CASE SCENARIOS

The following examples illustrate how the Moratorium applies in common situations. These case scenarios aim to help you better understand when you need to share information with insurers and when you are protected from doing so.

A

I am asymptomatic and have not been diagnosed with Familial Hypercholesterolaemia (FH). I was invited to participate in the national FH genetic testing programme because one of my family members has been diagnosed with FH. I was subsequently diagnosed with FH through genetic testing under the national programme and prescribed treatment to lower my future risk of developing cardiovascular disease.

What this means for you:

- Your genetic test for FH is a predictive test.
- You do not need to share your FH genetic test results with an insurer, as the genetic test was conducted under the national FH genetic testing programme.
- However, insurers may request the disclosure of and/or use the diagnosis of your FH condition as part of medical history for insurance underwriting.
- Your family members do not need to share your FH genetic test results with an insurer for their own insurance application, however insurers may request for family history of FH.

B

I have been clinically diagnosed with FH based on LDL-C levels and family history but have never taken a genetic test for FH. I was then invited to participate in the national FH genetic testing programme and received positive results for FH through genetic testing under the national programme. I was prescribed treatment to lower my future risk of developing cardiovascular disease.

What this means for you:

- Your genetic test for FH is a diagnostic test.
- You do not need to share your FH genetic test results with an insurer, as the genetic test was conducted under the national FH genetic testing programme.
- However, insurers may request the disclosure of and/or use the diagnosis of your FH condition as part of medical history for insurance underwriting.
- Your family members do not need to share your FH genetic test results with an insurer for their own insurance application, however insurers may request for family history of FH.

ANNEX B: CASE SCENARIOS

C

I have taken a genetic test and the results are positive, but I am asymptomatic and there are no abnormalities for all other tests. However, I have a family history of this genetic condition.

What this means for you:

- Your genetic test is a predictive test.
- You do not need to share your predictive genetic test results with an insurer, unless both conditions in the Moratorium are met:
  i. The sum assured/pay-out you are applying for is higher than the **Approved Financial Limit** set out in the Moratorium; and
  ii. The predictive genetic test you took is one of the **Approved Predictive Genetic Test** set out in the Moratorium (i.e., HTT genetic test for Huntington's disease and BRCA1/2 genetic test for breast cancer).
- Insurers may request for information on family history.
- Your family members do not need to share your predictive genetic test results with the insurer for their insurance application.
- Please refer to Scenario A if you had taken a predictive genetic test for FH under the National FH Genetic Testing Programme.

D

I have been diagnosed with a medical condition, and during participation in a research study, I received a genetic test result that is relevant to my diagnosis. Do I need to tell insurers about the genetic test result when disclosing my medical condition during the application process?

What this means for you:

- You do not need to share your genetic test result with an insurer, as the genetic test was conducted as part of a research study.
- Insurers may request the disclosure of and/or use the diagnosis of your medical condition as part of medical history for insurance underwriting.
- Your family members do not need to share your genetic test results with an insurer for their own insurance application, however insurers may request for family history of the medical condition.

ANNEX C: FREQUENTLY ASKED QUESTIONS

Q Who does the Moratorium apply to?

A

The Moratorium applies to Singapore residents (including Singapore Citizens, Permanent Residents of Singapore, as well as Residents with an Employment Pass / Work Permit / Pass Permit).

For non-residents, the Moratorium also applies, with the exception for the protections related to the use of predictive genetic test results for the underwriting of:

i. Life insurance
ii. Total Permanent Disability (TPD) insurance
iii. Long-Term Care (LTC) insurance
iv. Critical Illness (CI) insurance, and
v. Disability income insurance

For non-residents applying for the above-mentioned insurance products, insurers are allowed to request for any predictive genetic test results, regardless of the policy's sum assured or payout.

Q Does the Moratorium apply to prenatal and newborn screening genetic test results?

A

No, the request for and/or use of results from prenatal and newborn screening genetic tests (e.g. for metabolic disorders) do not fall within the scope of the Moratorium. The use of prenatal and newborn screening test results done while under clinical care is left to the discretion of individual insurers, similar to other diagnostic test results.

ANNEX C: FREQUENTLY ASKED QUESTIONS

Q When does the Moratorium apply and does it apply to insurance policies that were already in effect before the roll-out of the Moratorium?

A The Moratorium covers the underwriting of insurance, and applies to all insurance policies applied for and underwritten when the Moratorium is in force.

- Policies signed on or after 30 June 2025, i.e. implementation of the 2025 Moratorium, will be subject to the 2025 Moratorium. Policies that were already in effect before the implementation of the 2025 Moratorium will remain subject to the terms and conditions of the insurance contract as agreed between the insured and insurer at the point of signing the contract.
- Policies signed from 27 October 2021 to 29 June 2025, i.e. implementation of the 2021 Moratorium, and before the 2025 Moratorium, will be subject to the 2021 Moratorium.
- It does not apply to policies signed before the implementation of the 2021 Moratorium.

Q My insurance policy is already in effect before the roll-out of the Moratorium. Does the Moratorium apply to my existing policy?

A No, as the policy is already in effect, the claims process and outcome of your insurance policy continue to be subject to the terms of the insurance contract as they were agreed by the insurer and you before the Moratorium is implemented.

ANNEX C: FREQUENTLY ASKED QUESTIONS

Q How will I know that the new 2025 Moratorium protection for the national FH genetic testing programme applies to me?

A The 2025 Moratorium for the national FH genetic testing programme applies to you if you have undergone FH genetic testing at the Genomic Assessment Centre (GAC) either via a referral from your doctor to the GAC, or if you were contacted by the GAC to undergo FH genetic testing as part of cascade screening.

Q I took a predictive genetic test when I was asymptomatic. Subsequently, I developed the genetic condition with signs and symptoms at the point of insurance application. Can the insurer request the disclosure of and/or use my previous predictive genetic test results in insurance underwriting?

A No, the insurer cannot request and/or use the results of the predictive genetic test results that were taken when you were asymptomatic, for underwriting purposes, unless both conditions in the Moratorium are met:

i. The sum assured/pay-out you are applying for is higher than the **Approved Financial Limit** set out in the Moratorium; and

ii. The predictive genetic test you took is one of the **Approved Predictive Genetic Test** set out in the Moratorium (i.e., HTT genetic test for Huntington's disease and BRCA1/2 genetic test for breast cancer).

However, if you are symptomatic or have been diagnosed with a condition at the point of insurance application, you should declare your symptoms and medical condition. If a diagnostic genetic test has been done, that test should also be declared (as with any other diagnostic medical test results). Insurers can use the diagnostic genetic test result in insurance underwriting.

You will also need to follow the standard insurance application process, which may include a detailed health examination/answering questionnaire.

ANNEX C: FREQUENTLY ASKED QUESTIONS

Q What happens if I accidentally disclose a predictive genetic test result to an insurer?

A The Moratorium applies to accidental disclosure. For example, Insurers cannot consider the predictive genetic test result that is accidentally disclosed unless both conditions in the Moratorium are met:

i. The sum assured/pay-out you are applying for is higher than the **Approved Financial Limit** set out in the Moratorium; and

ii. The predictive genetic test you took is one of the **Approved Predictive Genetic Test** set out in the Moratorium (i.e., HTT genetic test for Huntington's disease and BRCA1/2 genetic test for breast cancer).

If the accidentally disclosed predictive genetic test result is favourable (i.e., negative result), insurers may use it in the underwriting process in deciding the underwriting outcome.

Q My insurance premiums are higher due to my family history, how does the Moratorium protect me?

A The Moratorium does not affect the Insurers' ability to request for and use information on family history, including whether the applicant has family member(s) with a diagnosed genetic condition to inform their decision on the insurance application.

👉 **Please note:** You may submit a predictive genetic test where the result is favourable (i.e. negative for the genetic condition tested) to your Insurer. However, a favourable predictive genetic test may not affect the cost of insurance as Insurers consider other factors such as family history, lifestyle and environment risks.

ANNEX C: FREQUENTLY ASKED QUESTIONS

Q How do I submit a complaint or feedback regarding disputes or suspected non-compliance with the Moratorium?

A If you have concerns or disputes regarding how an insurer has handled your genetic test information:

- For all disputes/concerns: You may work directly with the insurer to resolve complaint or feedback regarding disputes or suspected non-compliance with the Moratorium.
- For complaints on insurance claims: If you and the insurer fail to reach a resolution, you may file a complaint at the Financial Industry Disputes Resolution Centre (FIDReC). Alternatively, you can approach the Singapore Mediation Centre (SMC) for mediation.

FIDReC serves as the first port of call for consumers who require mediation of claims-related disputes arising from the Moratorium (where a customer relationship already exists); consumers will be directed to SMC if there is no existing relationship with the insurer concerned and in the event that FIDReC is unable to handle the cases arising from the Moratorium.

For further queries on the Moratorium, you may write in to HCSA_Enquiries@moh.gov.sg.

Q Is there an end-date of the Moratorium?

A No, the Moratorium is open-ended with no expiry date. It is reviewed regularly and updated where necessary to keep up with the rapidly evolving developments in genetic testing.