



RAVI KUMAR KOUL <koulravikumar@gmail.com>

Future of thousands of Indian Medical Aspirants at risk due to absence of answer to a few important questions from the NMC

1 message

Ravi Kumar Koul <koulravikumar@gmail.com>
To: dr.vipul@nic.in, grievance_cell@nmc.org.in
Bcc: RAVI KUMAR KOUL <koulravikumar@gmail.com>

Wed, Sep 13, 2023 at 1:34 PM

To,

13.09.2023

Dr. Vipul Aggarwal

Secretary, **National Medical Commission** (NMC)
Joint Secretary (Medical Education), **MoHFW**, Govt of India
New Delhi
dr.vipul@nic.in
grievance_cell@nmc.org.in

REFERENCE - in continuation to all my letters sent directly to the National Medical Commission & the Ministry of Health and Family Welfare and also through the office of the Hon'ble Prime Minister for more than a year.

REGARDING - I have been requesting the National Medical Commission for last more than 1.5 years for Clarification on Gazette notification Foreign Medical Graduate Licentiate Regulations, 2021 of 18th November, 2021 but any replies received through Centralized Public Grievance Redress and Monitoring System at <https://pgportal.gov.in/> all were incorrect even had no connection with the points raised in my letters.

SUBJECT - Future of thousands of Indian Medical Aspirants at risk due to absence of answer to a few important questions from the National Medical Commission and the Ministry of Health and Family Welfare.

REASON FOR SENDING MY LETTERS ADDRESSED THROUGH THE OFFICE OF THE HON'BLE PRIME MINISTER - Never ever got even single line reply to my letters sent directly to the National Medical Commission or the Ministry of Health and Family Welfare.

Dear **Respected Sir**,

Thank you sir from the core of my heart for this initiative taken up by you for direct communication with the students or parents or otherwise that was missing in the National Medical Commission since its inception.

During the erstwhile Medical Council of India, people associated or aspiring for the medical education were allowed in to the office during a stipulated time on every working day to get the official answer for the questions coming up in the minds of the concerned and the reply was given by none other than the seniors officers not below the post of a section officer.

Despite the Gazette Notification Foreign Medical Graduate Licentiate Regulations 2021 of 18.11.2021; Indian students continue flying abroad in huge numbers to various countries.

I want to inform you that I have written multiple letters directly to the Ministry of Health & Family Welfare and the National Medical Commission regularly since last more than 1.5 years; to know the actual interpretation of various sections of Gazette Notification - Foreign Medical Graduate Licentiate Regulations, 2021 dated 18th November, 2021.

Not even a single letter is written by me for my personal or individual interest but for the public interest, for the benefit of aspiring doctors of the country; their parents and my country India.

In absence of the proper interpretation of the Foreign Medical Graduate Licentiate Regulations, 2021 dated 18th November, 2021; the future of thousands of Indian Medical Aspirants is at risk.

Students are fully dependent on verbal promises by the education consultants as well as the university websites (mostly managed by agents).

Respected Sir, guidance to a student going abroad for medical education must come from a government source not education consultants or medical institutions abroad.

It is the National Medical Commission that makes the rules and regulations on medical education and it is the same National Medical Commission that will give or refuse license to these doctors on return with the degrees from abroad.

If after completion, the degree / diploma received by the student does not satisfy the National Medical Commission rules and regulations for licensing as medical practitioners in India; students will lose so many years of precious time of life as well as hard earned money of their parents.

In case we do not educate these students today; they will lose time, money and the country will lose huge foreign exchange beyond calculations. We need to educate the aspiring students with the reality before seeking admissions abroad, not after they return with degrees or diplomas.

Respected Sir, Various Indian Embassies have put advisories on their official websites but many of these have not posted details after verifying facts from the local authorities or the National Medical Commission but **details collected from senior students or those influencing the place or medical institutions**; all these can not be trusted. Details from only local authorities are authentic and only our Embassy can obtain the facts

about the law on medical education from local authorities in that country and post the same on the embassy website for the guidance of aspiring Indian medical students.

An advisory in simple language (not legal language) from the National Medical Commission or the Ministry of Health and Family Welfare giving answer to the below described THREE questions can save thousands of students from being misled to various destinations abroad and also save a huge Forex of the Country as well.

DESCRIPTION OF REFERENCE NO. 01

“The National Medical Commission Gazette Notification; dated the 18th November, 2021; No. UGMEB/NMC/Rules & Regulations/2021/” that reads –

4. Grant of permanent registration to Foreign Medical Graduate.—No foreign medical graduate shall be granted permanent registration, unless he has–

(a) (ii) Undergone an internship for a minimum duration of twelve months in the same foreign medical institution;

ABOUT INTERNSHIP ABROAD – confusion has been created by many including the advisories issued by various Indian Embassies while explaining about the Practical Training / Clinical Rotation/ Clerkship / Internship in almost all the CIS countries like Russia, Georgia, Armenia, Azerbaijan, Belarus, Kazakhstan, Kyrgyzstan, Moldova, Tajikistan, Turkmenistan, Ukraine, Uzbekistan etc.

The problem is the same in all these countries above; where the Practical Training/ Clinical Rotation/ Clerkship is now called INTERNSHIP and is said to be Integrated with the main course between 3rd to 6th year of education.

FAQ’s were issued for explanation on internship BUT with the remarks – **“these are only the nature of explanation without legal validity”**; and these words in FAQ’s (**without legal validity**) are being misused by many to misguide the aspiring students.

QUESTION NO. 01

The National Medical Commission must tell the aspirants if this integrated internship being done during the main course from 3rd to 6th year (practical training/ Clinical Rotation/ Clerkship) of education as mentioned by various Indian Embassies Abroad in their advisories / RTI Replies is valid as desired Internship for licensing in India or not.

DESCRIPTION OF REFERENCE NO. 02

“The National Medical Commission Gazette Notification; dated the 18th November, 2021; No. UGMEB/NMC/Rules & Regulations/2021/” reads -

SCHEDULE-I

(See regulation 4)

CRITERIA TO RECOGNISE FOREIGN MEDICAL GRADUATES APPLYING FOR LICENCE OR PERMANENT REGISTRATION TO PRACTICE IN INDIA

2. Eligibility for primary medical qualification in a country outside India:

(iv) Duration of course: *The total duration of the foreign medical graduation course* shall be completed within ten years from the date of joining the course.

QUESTION NO. 02

What does **THE TOTAL DURATION OF THE FOREIGN MEDICAL GRADUATION COURSE** required to be completed within 10 years from the date of joining mean (**considering the implementation of NeXT as was released 27th June, 2023**) –

1. Undergraduate Degree Course abroad.

OR

2. Undergraduate Degree Course + Internship Abroad.

OR

3. Undergraduate Degree Course + Internship Abroad + Registration / License Abroad.

OR

4. Undergraduate Degree Course + Internship Abroad + Registration / License Abroad + NeXT 1 in India + CRMI internship in India.

OR

5. Undergraduate Degree Course + Internship Abroad + Registration / License Abroad + NeXT 1 in India + CRMI internship in India + NeXT 2 in India.

OR

6. Anything else may kindly let me know the same please for the information and benefit of the Indian aspiring doctors abroad.

DESCRIPTION OF REFERENCE NO. 03

“The National Medical Commission Gazette Notification; dated the 18th November, 2021; No. UGMEB/NMC/Rules & Regulations/2021/” reads –

4. Grant of permanent registration to Foreign Medical Graduate.–No foreign medical graduate shall be granted permanent registration, unless he has –

(b) Registered with the respective professional regulatory body or otherwise, competent to grant license to practice medicine in their respective jurisdiction of the country in which the medical degree is awarded and at par with the license to practice medicine given to citizen of that country;

QUESTION NO. 03

What does clause 4(b) mentioned in FMGL 2021 referred above mean –

1. He or she must be registered as a medical practitioner in the country abroad

OR

2. He or she must be eligible to register as a medical practitioner in the country abroad

OR

3. His / her Degree must be Registrable in the country abroad
OR
4. He or she must possess License to Practice as junior doctor (as is case in many countries)
OR
5. He or she must possess License to Practice as independent practitioner
OR
6. Anything else may kindly let us know the same please for the information and benefit of Indian students.

To save all the aspirants from such a situation, I request the National Medical Commission to answer the above three questions for the benefit of the whole country.

Fresh admissions are on for session 2023 – 24 and approximately 15000 to 20000 students are expected to fly soon for various countries.

The Ministry of Health & Family Welfare and the National Medical Commission need to act fast to issue instructions (answer the above questions through a public notification / advisory / alert in a simple language) to stop more and more innocent students from being misled and their career spoiled.

Looking at the Gazette Notification and other rules & regulations governing medical education in India and Abroad if the National Medical Commission does not educate the aspiring doctors today and may reject the degree or degrees of the students on return, like first batch under FMGL2021 is expected to return in 2027 calculating at 15000 students per year there will be a loss of **1,890,000,000 USD** of **FOREX** to the India between 2021 to 2027.

**CALCULATIONS OF THE EXPECTED LOSS OF FOREX TO OUR COUNTRY INDIA
FOR BATCHES OF MBBS STUDENTS ABROAD FROM 2021 UPTO 2027**

Calculating at approximately 15000 MBBS students per year between 2021 to 2027

Calculation of Students batch 2021 to 2027 (for 6 years period)

No of students joining MBBS abroad per batch	15,000 every year	
Average expenses per year per student	6,000	USD
Expenses for 15000 students in 1 year	90000000	USD
Total Spent by 2021 batch till 2027	540000000	USD

Calculation of Students batch 2022 to 2027 (for 5 years period)

No of students joining MBBS abroad per batch	15,000 every year
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Average expenses per year per student	6,000	USD
Expenses for 15000 students in 1 year	90000000	USD
Total Spent by 2022 batch till 2027	450000000	USD

Calculation of Students batch 2023 to 2027 (for 4 years period)

No of students joining MBBS abroad per batch	15,000 every year	
Average expenses per year per student	6,000	USD
Expenses for 15000 students in 1 year	90000000	USD
Total Spent by 2023 batch till 2027	360000000	USD

Calculation of Students batch 2024 to 2027 (for 3 years period)

No of students joining MBBS abroad per batch	15,000 every year	
Average expenses per year per student	6,000	USD
Expenses for 15000 students in 1 year	90000000	USD
Total Spent by 2024 batch till 2027	270000000	USD

Calculation of Students batch 2025 to 2027 (for 2 years period)

No of students joining MBBS abroad per batch	15,000 every year	
Average expenses per year per student	6,000	USD
Expenses for 15000 students in 1 year	90000000	USD
Total Spent by 2025 batch till 2027	180000000	USD

Calculation of Students batch 2026 to 2027 (for 1 year period)

No of students joining MBBS abroad per batch	15,000 every year	
Average expenses per year per student	6,000	USD
Expenses for 15000 students in 1 year	90000000	USD
Total Spent by 2026 batch till 2027	90000000	USD

Minimum Loss of Foreign Exchange from 2021 up to 2027 = 1890000000 USD

To save the aspirants from such a situation and the country from such a huge loss, I request the Ministry of Health & Family Welfare; the National Medical Commission to take steps to save the country from such a disaster and stop the students from being misguided and misled.

Sincerely Yours,

Ravi Kumar Koul

Plot No 21; Pocket 1; GF;
Ramprastha Greens,
Sector 7; Vaishali,
Ghaziabad; Uttar Pradesh, INDIA Pin 201010
Mobile & WhatsApp Number **+91 9999155591**
EMAIL koulravikumar@gmail.com

 **13.09.2023 to Dr. Vipul Aggarwal Secretary, NMC.pdf**
535K



RAVI KUMAR KOUL <koulravikumar@gmail.com>

MOST URGENT & PRIORITY PLEASE

1 message

Ravi Kumar Koul <koulravikumar@gmail.com>
To: grievance_cell@nmc.org.in, secy-mci@nic.in, dr.vipul@nic.in
Bcc: RAVI KUMAR KOUL <koulravikumar@gmail.com>

Thu, Nov 30, 2023 at 3:05 PM

MOST URGENT & PRIORITY PLEASE

To,

30.11.2023

Dr. Vipul Aggarwal

Secretary,

National Medical Commission (NMC)

Joint Secretary (Medical Education),

MoHFW, Govt of India,

New Delhi

Email - grievance_cell@nmc.org.in secy-mci@nic.in dr.vipul@nic.in**Subject & Reference** - National Medical Commission (Under Graduate Medical Education Board) public notice no. U/-15024/9/2023-UGMEB dated the 22nd Nov. 2023.Dear **Respected Sir**,

This email is in continuation to my previous email dated 27.11.2023.

1. From the above Notification, I could understand that the time granted to students to seek transfer/migration/mobility as mentioned in the public notice is that the students must finish the whole process of transfer/migration/mobility before 22.02.2024.

Public Notice as referred above reads - "This option of transfer/migration/mobility shall be availed within 3 months from the date of issue of this public notice".

But there is a serious problem to complete the whole process in 3 months time; that could seriously affect the students to avail it as this scheme is a one-time measure.

Most of the students whether studying in online or offline mode will finish their semester in the end of December or mid January and incase they withdraw in mid-session now, they will loose complete one semester of their education because –

- ❖ To get the transcript from the present university it will take 15 to 45 days (varies from university to University).
- ❖ Taking transfer and applying for admission in a new university and country the admission process takes not less than a month, this means that the whole process can take more than 90 days as prescribed in the Public Notice.
- ❖ Also in the 2nd fortnight of December and 1st week of January most of the institutions abroad especially Ukraine are closed due to Christmas and New Year holidays; that means students even if they withdraw admission mid-session can not get the process done by 22.02.2024 as required.

I request you to kindly allow these students to complete the process to take transfer/migration/mobility in 4 months instead of 3 months that is on or before 22.03.2024

2. Further as is confirmed to me by various persons that the above notification is for the students those joined the classed in the University before 18.11.2023 not for those whose classes started after 18.11.2023 or in other words say the Notification is for the students those come under Screening Test Regulations 2002 and Not for the students those come under FMGL 2021.

It could of great relief and support to maximum number of Ukraine Returned Indian Medical students those returned to India through Operation Ganga after the war broke if you kindly consider the same on humanitarian grounds, if possible and modify the notification and grant permission to take transfer/migration/mobility to all the Ukraine Returned Indian Medical students those returned to India through Operation Ganga after the war broke.

I will be thankful to you as always.

Sincerely Yours,

Ravi Kumar Koul

Plot No 21; Pocket 1; GF;
Ramprastha Greens,
Sector 7; Vaishali, Ghaziabad;
Uttar Pradesh
INDIA Pin 201010

Mobile & WhatsApp Number **+91 9999155591**

EMAIL koulravikumar@gmail.com

 **30.11.2023 Dr. Vipul Aggarwal Secretary NMC.pdf**
494K



RAVI KUMAR KOUL <koulravikumar@gmail.com>

screening test regulations 2002 or FMGL 2021

6 messages

Ravi Kumar Koul <koulravikumar@gmail.com>
To: grievance_cell@nmc.org.in, secy-mci@nic.in, dr.vipul@nic.in
Bcc: RAVI KUMAR KOUL <koulravikumar@gmail.com>

Mon, Nov 27, 2023 at 11:07 AM

To,

27.11.2023

Dr. Vipul Aggarwal

Secretary,

National Medical Commission (NMC)

Joint Secretary (Medical Education),

MoHFW, Govt of India

New Delhi

Email - grievance_cell@nmc.org.in secy-mci@nic.in dr.vipul@nic.in**Reference -** National Medical Commission (Under Graduate Medical Education Board) public notice no. U/-15024/9/2023-UGMEB dated the 22nd Nov, 2023**Subject -** Clarification on various issues relating to Foreign Medical Graduates (FMGs)Dear **Respected Sir,**

Public Notice reads –

IV. Allowing FMGs from Ukraine to continue their study from different country (except India)

☑ In continuation to the earlier scheme dated 15th September, 2022 namely Academic Mobility Program, NMC has decided to extend such scheme as a one-time measure to the FMGs returning from Ukraine to avail the benefits of said scheme and complete their remaining medical course. The Degree may however be awarded by the University to where they shall migrate. This option of transfer/migration/mobility shall be availed within 3 months from the date of issue of this public notice.

Public Notice further reads –

D. CAPPING OF TIME LIMIT TO QUALIFY FMG EXAMINATION

☒ The time limit for appearing in FMG Examination/ NExT will be 10 years from the completion of their training/ course in Foreign Medical Institution.

Lot of students who had gone to Ukraine in the year 2021 and those who come under FMGL 2021 have started taking transfer to various countries as most of them are of the view that this public notice allows them to take transfer, as the people in trade having vested interests have told these innocent students that nothing is mentioned in the public notice whether it is applicable to students under screening test regulations 2002 or FMGL 2021; but it applicable for all.

Though I tried to stop them and requested them get it verified from the National Medical Commission (Under Graduate Medical Education Board) before taking any decision; but the people in trade helping them transfer are stronger in marketing so these innocent students are falling in their trap.

I will be thankful to you for the answer of the following two questions for the benefit of the students please.

QUESTION 1 - Is this Public Notice applicable for students who come under screening test regulations 2002 or FMGL 2021 to opt for transfer/ migration/ mobility.

QUESTION 2 - Is this capping of time limit changed for all Foreign Medical Graduates who come under FMGL 2021?

To save these aspirants from such a situation, I request you to kindly answer the above two questions for the benefit of hundreds of Ukraine returned Indian medical students immediately before it is late please.

Sincerely Yours,

Ravi Kumar Koul

Plot No 21; Pocket 1; GF;
Ramprastha Greens,
Sector 7; Vaishali, Ghaziabad;
Uttar Pradesh
INDIA Pin 201010

Mobile & WhatsApp Number **+91 9999155591**

EMAIL koulravikumar@gmail.com

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grievance cell NMC <grievance_cell@nmc.org.in>
To: Ravi Kumar Koul <koulravikumar@gmail.com>

Tue, Dec 12, 2023 at 3:50 PM

Sir/ Madam

Your Grievance has been acknowledged at NMC.

Hearing of your grievance is scheduled on **14th December 2023 from 11:00 AM onwards through VC.**

Meeting Link will be shared only after you will confirm your presence.

You are requested to confirm your presence by **12:00 noon** tomorrow by reverting mail.

Regards
Grievance Cell
National Medical Commission

From: Ravi Kumar Koul <koulravikumar@gmail.com>
Sent: Monday, November 27, 2023 11:07 AM
To: grievance cell NMC <grievance_cell@nmc.org.in>; secy-mci@nic.in <secy-mci@nic.in>; dr.vipul@nic.in <dr.vipul@nic.in>
Subject: screening test regulations 2002 or FMGL 2021

[Quoted text hidden]

Ravi Kumar Koul <koulravikumar@gmail.com>
To: grievance cell NMC <grievance_cell@nmc.org.in>
Bcc: RAVI KUMAR KOUL <koulravikumar@gmail.com>

Wed, Dec 13, 2023 at 12:56 AM

Respected Sir / Madam,

Thanks for the invitation; yes sir, I shall be happy to join you in the meeting.

Regards,

Ravi Kumar Koul

Plot No 21; Pocket 1; GF; Ramprastha Greens,
Sector 7; Vaishali, Ghaziabad; Uttar Pradesh
INDIA Pin 201010

Mobile & WhatsApp Number **+91 9999155591**

EMAIL koulravikumar@gmail.com

[Quoted text hidden]

grievance cell NMC <grievance_cell@nmc.org.in>
To: Ravi Kumar Koul <koulravikumar@gmail.com>

Wed, Dec 13, 2023 at 5:10 PM

Sir/ Madam

Your Grievance has been acknowledged at NMC.

Hearing of your grievance is scheduled on **14th December 2023 from 11:00 AM onwards through VC.**

Please find the virtual meeting link as below.

https://teams.microsoft.com/join/19%3ameeting_MTYwMWVjOGYtZWE1ZS00OTIxLWI4ZDI4YTJhMGY2YmQ5NjE5%40thread.v2/0?context=%7b%22Tid%22%3a%22b0ebec68-73cc-4678-ac24-4d2c3ce38b6d%22%2c%22Oid%22%3a%22efd3524d-6531-4f3b-a84b-3d4b0ecf72fc%22%7d



Join conversation

teams.microsoft.com

Kindly confirm your presence by reverting mail.

Note: It is requested that join the meeting link with your same mail id .

Thanks & Regards

Grievance Cell

National Medical Commission

New Delhi.

From: Ravi Kumar Koul <koulravikumar@gmail.com>

Sent: Wednesday, December 13, 2023 12:56 AM

To: grievance cell NMC <grievance_cell@nmc.org.in>

Subject: Re: screening test regulations 2002 or FMGL 2021

[Quoted text hidden]

Admission Advisor <contact@admissionadvisor.org>

To: grievance cell NMC <grievance_cell@nmc.org.in>

Cc: Ravi Kumar Koul <koulravikumar@gmail.com>

Wed, Dec 13, 2023 at 5:34 PM

Thank you I confirm my presence

[Quoted text hidden]

Ravi Kumar Koul <koulravikumar@gmail.com>

To: grievance cell NMC <grievance_cell@nmc.org.in>

Wed, Dec 13, 2023 at 5:36 PM

Thank you for the mail

Will join the meeting as scheduled through this email I'd only

[Quoted text hidden]



RAVI KUMAR KOUL <koulravikumar@gmail.com>

Future of thousands of Indian Medical Aspirants at risk due to inconsistency and contradiction in various notifications

1 message

Ravi Kumar Koul <koulravikumar@gmail.com>

Tue, Dec 19, 2023 at 8:00 PM

To: dr.vipul@nic.in, secy-mci@nic.in, grievance cell NMC <grievance_cell@nmc.org.in>

Bcc: RAVI KUMAR KOUL <koulravikumar@gmail.com>

SPEED POST & EMAIL

To,

19.12.2023

Dr. Vipul Aggarwal

Secretary,

National Medical Commission (NMC)

Joint Secretary (Medical Education),

MoHFW, Govt of India

New Delhi

Email - dr.vipul@nic.in; secy-mci@nic.in; grievance_cell@nmc.org.in

REFERENCE – Various letters that were sent earlier directly and also through the offices of the Hon'ble Prime Minister of India, Hon'ble Health and Family Welfare Minister of India, and the National Medical Commission; and the recent in-person online meeting on 14.12.2023.

REGARDING – Gazette notification Foreign Medical Graduate Licentiate Regulations, 2021 of 18th November 2021 (published on 22.11.2023) and various other notifications after which there is a lot of **inconsistency and contradiction**.

SUBJECT – Future of thousands of Indian Medical Aspirants at risk due to **inconsistency and contradiction** in various notifications of the National Medical Commission.

Dear **Respected Sir**,

Thank you, Sir, for the initiative of launching direct communication with the students, parents, etc. It was something missing from the National Medical Commission.

I am grateful for allowing me to speak with you at an online conference on 14.12.2023.

This letter is in continuation of the points I raised and discussed with you in the meeting. I am hoping you will discuss them with the concerned and resolve the inconsistencies and contradictions in various notifications.

I wholeheartedly welcome the National Medical Commission (Foreign Medical Graduate Licentiate) Regulations, 2021 right from day one; a big step for regulating better quality medical education for students in India and abroad; but there is a need for a soft approach to raise good doctors and especially those students who can ill-afford expensive Private medical education in India so prefer to go abroad (all NEET qualified students).

I kindly request you to go through the observations described as **I to VI CHAPTERS** on various Gazette Notifications, FAQ's and Public Notices as under: -

CHAPTER - I

(INCONSISTENCY AND CONTRADICTIONS IN THE ORDERS, NOTIFICATIONS, AND FAQ'S)

Let us revisit and understand various notifications issued by the National Medical Commission on and after 18.11.2021; and how these notifications can benefit or harm the medical education of Indian students studying abroad.

Multiple notifications as listed below from S. No. 1 to 7 are inconsistent and contradictory and can destroy the careers of thousands of students who have been studying medicine abroad since November 2021.

- 1.** The National Medical Commission **Foreign Medical Graduate Licentiate Regulations, 2021** dated 18.11.2021; **READS** – The total duration of the foreign medical graduation course shall be completed within ten years from the date of joining the course.
- 2. FAQ'S** - FMG covered by National Medical Commission (Foreign Medical Graduate Licentiate) Regulations 2021 dated 22.02.2022; **READS** - The total duration of the foreign medical graduation course shall be completed within ten years from the date of joining the course. (Reg. 2 (iv) of Schedule I of FMGL 2021)
- 3.** The National Medical Commission Gazette Notification **“NMC, National Exit Test Regulations, 2023”** dated 27.06.2023; (though implementation of the National Exit Test (NExT) examination is deferred vide the National Medical Commission Public Notice Dated 13.7.2023) however the Gazette Notification **READS** – There is no restriction to the number of attempts to appear in **NExT Step-1** provided the candidate has passed both **NExT Step-1** and **NExT Step-2** Examination within 10 years of joining the MBBS Course.
- 4.** The National Medical Commission, **the “Graduate Medical Education Regulations, 2023” or “GMER-23”** (UGMEB, 2023) Notification dated 02.06.2023; **READS:-** Provided under no circumstances the student shall be allowed more than four (04) attempts for first year (First

Professional MBBS) and no student shall be allowed to continue undergraduate medical course after nine (09) years from the date of admission into the course.

IT FURTHER READS - The student admitted into a Graduate Medical Education Programme shall not be deemed to have completed his graduation until he completes his rotating medical internship as per Compulsory Rotating Medical Internship Regulations, 2021.

5. The National Medical Commission; **Public Notice** dated 22.11.2023; **READS** – The time limit for appearing in **FMG Examination/ NExT** will be 10 years from the completion of their training/ course in Foreign Medical Institution.

6. The National Medical Commission Notification **Public Notice** dated 07.12.2023; **READS** – All FMG's shall have to complete their internship within 10 years from date of joining their Foreign Medical Institutions to procure qualification equivalent to MBBS in India.

7. The National Medical Commission; **Frequently Asked Questions** (FAQ's) related to FMG's with reference to the Public Notice dated 7th December, 2023 No. U-15024/9/2023- UGMEB dated 11.12.2023; **READS** – All FMG's shall have to complete their internship in India within 10 years of the date of joining their Foreign Medical Institutions.

Dear **Respected Sir**,

Going through the above summary of all the mentioned notifications; you can see the serious inconsistencies and contradictions in these orders, gazette notifications, and public notices that can be detrimental to the future of students.

From the 7 notifications and FAQ's mentioned above which two say the same meaning; I believe there is none of them.

While discussing on online video conference you agreed to my point that the Public Notices and the FAQ's cannot supersede any Gazette Notification.

Sir, you further told me that the Public Notice dated 22.11.2023 had some errors, and the same was rectified in the next notification and FAQ's dated 07.12.2023 and 11.12.2023.

Here, I believe that we correctly read all the Gazette Notifications issued by The National Medical Commission on and after 18.11.2023 and all the public notices or FAQ's issued on 22.11.2023, 07.12.2023 and 11.12.2023.

We still observe that the public notices and FAQ's issued on 22.11.2023, 07.12.2023, as well as 11.12.2023 all are inconsistent and contradictory to the Gazette Notifications. None of these are following the Gazette Notifications in true spirit.

Kindly do the needful to remove the anomalies that could harm the careers of Foreign Medical Graduates since they too are our people and wish to serve humanity.

I request the National Medical Commission to kindly review the Gazette Notifications issued by the National Medical Commission as well as **all the active Gazette Notifications** issued by the erstwhile Medical Council of India and do the needful to remove the anomalies there in.

CHAPTER - II (THE CAP OF 10 YEARS ON THE FOREIGN MEDICAL COURSE)

The National Medical Commission has practically announced **Zero; negative Breathing time** for Foreign Medical Students and choked their career through various notifications that followed on and after 18.11.2023.

The National Medical Commission, Foreign Medical Graduate Licentiate Regulations, 2021 dated 18.11.2021 says - The total duration of the foreign medical graduation course shall be completed within ten years from the date of joining the course.

This condition was fine for the Foreign Medical Students, as is precedence in India too that a student studying 4.5 years in India is allowed to complete the whole course in 09 years; i.e. double the duration of the course, and Foreign Medical Graduate was allowed to complete the course abroad for a period of 6 years main course plus minimum 1 year of internship in 10 years (that was practically, logically possible and correct).

The National Medical Commission, National Exit Test Regulations, 2023 dated 27.06.2023 is unfair for Foreign Medical Students that says - There is no restriction to the number of attempts to appear in **NExT Step-1 provided the candidate has passed both NExT Step-1 and NExT Step-2 Examination within 10 years of joining the MBBS Course.**

The National Exit Test Regulations, 2023 imposed the condition that the candidate has to pass both **NExT Step-1** and **NExT Step-2** Examinations within 10 years of joining the MBBS Course; that is fine for the Medical Students studying in India as they get a time of 4.5 years to clear both **NExT Step-1** and **NExT Step-2** Examinations after completion of their degree course.

In The National Exit Test Regulations, 2023 the Medical Students studying abroad should have been given a separate window and not put in the same system as Medical Students studying in India.

While the course duration for Medical Students studying Abroad is such that they can not complete this condition at all, except for countries in the Indian sub-continent namely Sri Lanka, China, Bangladesh, and Nepal.

The National Medical Commission needs to understand that the duration of medical education in most of the CIS countries like Russia, Georgia, Armenia, Azerbaijan, Belarus, Kazakhstan, Kyrgyzstan, Moldova, Tajikistan, Turkmenistan, Ukraine, Uzbekistan, etc. is longer than elsewhere. Please have a look at the same as under: -

- 1) **Duration of Course in Abroad** = 6 years
- 2) **Internship in Abroad** = 1 year or Residency up to 3 yrs
(In a few countries it is 2 to 3 years of residency in lieu of 1 year of internship)

3) The licensing examination (Abroad) = 6 Months (can take more time)

TOTAL COURSE FOR FMG'S in ABROAD (1+2+3) = 7.5 years can go up to 9.5 years

4) NExT Step-1 = 9th to 11th Year

(Without any breathing period Foreign Medical Students has to appear for NExT Step-1 but it is not possible even in 10th Year; while the Gazette Notification says - There is no restriction to the number of attempts to appear in NExT Step-1 but the Foreign Medical Students may not even be able to get ONE chance within 10 years to appear for NExT Step-1)

5) CRMI Internship = 10th to 12th year

(While the Gazette Notification says - Medical colleges or institutions **may** allow up to 7.5 per cent of their permitted quota of interns to accommodate internship by Foreign Medical Graduates (only 7% seats reserved for FMGE) – this means all the Foreign Medical Graduates may not get space to join internship for a long time.

6) NExT Step-2 = 11th to 13th year (Incase a CRMI seat is granted in time)

TOTAL COURSE FOR FMG'S UPTO NExT Step-2 (1+2+3+4+5+6) = 11 to 13 YEARS

This calculation will vary from country to country but even if a student clears everything in abroad as well as in India without any trouble, still he or she can not be able to reach for **NExT Step-2 in a minimum of 11 years**; though the fact is hardly every student will be able to reach the milestone without taking rest for even a single day.

✓ **The NMC Foreign Medical Graduate Licentiate Regulations, 2021** clearly says the foreign medical graduation course is to be completed in 10 years from the date of joining but why was such a contradictory change made in the shape of **The NMC National Exit Test Regulations 2023** about the cap of 10 years for completion of NExT examinations; without taking the actual course duration of Foreign Medical Graduates into consideration.

✓ Soon after the Draft for **the NMC National Exit Test Regulations 2023** was released, a lot of representations were sent to the Ministry of Health and Family Welfare, and the National Medical Commission in the form of emails and letters, but it seems none has been taken seriously and into consideration.

✓ **Indian Medical Graduates** complete their medical graduation course in 4.5 years and get another 4.5 years to complete the internship in 9 years **(that is double the actual professional course)**

AND

Foreign Medical Graduates complete their medical education abroad in a minimum of 7.5 years to 9.5 years, so the FMG is granted **(-3) years** to complete the internship in 10 years.

This is going to have serious implications on the future and career of Foreign Medical Graduates; this all seems to have been drafted and designed for a disastrous result for Foreign Medical Graduates.

The NMC National Exit Test Regulations 2023 notification has been issued without going through the previous **records available with** the National Medical Commission; where the Foreign Medical Graduate degree records from various countries are already with the National Medical Commission for decades and it is very easy for the National Medical Commission to know through these records about **the duration of basic MBBS equivalent course** in any country.

Though it seems to me a human error but if it is not rectified well in time (right now), it will be utter discrimination with the Foreign Medical Graduates of our country and harm their future.

The National Medical Commission needs to understand things and revisit the Gazette Notifications so that the necessary amendments can be done to make the law more transparent and result-oriented.

I request the National Medical Commission to review the whole system of Foreign Medical Education from the previous records of Erstwhile MCI and the present NMC and issue necessary directions for **amendments** in the **NMC - National Exit Test Regulations 2023** especially the cap of 10 years imposed on Foreign Medical students to qualify NExT Step-1 and NExT Step-2.

CHAPTER - III

(LICENSE TO PRACTICE MEDICINE AT PAR WITH THE LOCAL STUDENTS ABROAD)

The National Medical Commission, Foreign Medical Graduate Licentiate Regulations, 2021 dated 18.11.2021 says -

4. Grant of permanent registration to Foreign Medical Graduate- No foreign medical graduate shall be granted permanent registration, unless he has -

(b) registered with the respective professional regulatory body or otherwise, competent to grant license to practice medicine in their respective jurisdiction of the country in which the medical degree is awarded and at par with the license to practice medicine given to citizen of that country;

Let us assume the Indian students will obtain the license to practice medicine at par with the local citizens of that country but logically, legally and practically **that is possible only if the Indian students study the course at par with the local students** of that country.

The National Medical Commission, Foreign Medical Graduate Licentiate Regulations, 2021 dated 18.11.2021 further says -

(ii) Content of course or Training leading to primary medical qualification

(a) The course and internship or clinical clerkship shall commensurate with the MBBS course of India in accordance with the Regulations on Graduate Medical Education, 1997 and subsequent amendments thereto, and shall include the subjects mentioned therein as are duly recognised by the Commission under sub- section (2) of section 61 of the Act;

The question here arises: -

How can any country on earth give the license to citizens of any country studying medicine in that country to practice medicine as registered medical practitioners at par with the one given to citizens of that country **while teaching the curriculum designed by a foreign country (in this case it is India)**?

In other words, say teaching the curriculum not at par with the country but giving the license to practice medicine at par with local students?

This condition is practically, logically, and legally impossible for any country to implement.

The question arises; Do Australia, Canada, New Zealand, the United Kingdom and the United States of America follow the NMC Foreign Medical Graduate Licentiate Regulations, 2021, or The NMC National Exit Test Regulations 2023? No, they do not and will not; but still, they are given exemption from appearing in FMGE or NExT examinations. Why is this discrimination with other countries?

We know the Indian students had been going to the former USSR constituent in Government of India nominations for decades. However, the same countries are said not to be good today.

Does this also mean that the doctors from these colleges who are practicing in India are not well-qualified professionals?

CHAPTER – IV

Graduate Medical Qualifications from Australia, Canada, New Zealand, UK and USA exempted from Foreign Graduate Examination / NExT Examinations

Gazette Notification from the Medical Council of India No. F.No. MCI-12(2)/2010-Med.Misc./22383 dated 06.07.2011 - “Minimum qualifications for teachers in Medical Institutions (Amendment) Regulations, 2010”.

Gazette Notification from the Medical Council of India No. MCI/203(9)/2011-Regn./51257 dated 20.12.2011; “Screening Test Regulations (Amendment), 2011” **READS -**

“(4) Provided further that a person seeking provisional or permanent registration shall not have to qualify the Screening Test if he/she holds an Undergraduate medical qualification from Australia/ Canada/ New Zealand/ United Kingdom/ United States of America and the holder thereof also been awarded a Post Graduate medical qualification in Australia/ Canada/ New Zealand/ United Kingdom /United States of America and has been recognised for enrolment as medical practitioner in that country”.

The National Medical Commission, Foreign Medical Graduate Licentiate Regulations, 2021 dated 18.11.2021 says –

- Undergone a course leading to foreign medical degree with a minimum duration of fifty-four months.
- The course and internship or clinical clerkship shall commensurate with the MBBS course of India.

I request the National Medical Commission to study understand to review the above two Gazette Notifications issued by the erstwhile Medical Council of India –

- Do Australia, Canada, New Zealand, the United Kingdom, and the United States of America follow the NMC Foreign Medical Graduate Licentiate Regulations, 2021, and other NMC Regulations?
- Do Australia, Canada, New Zealand, the United Kingdom, and the United States of America follow the FMGL 2021 where the minimum duration of the MBBS Equivalent course shall be 54 months; though most of these countries have 48 months of course equivalent to MBBS?
- Do Australia, Canada, New Zealand, the United Kingdom, and the United States of America follow the CBME course curriculum?
- Do Australia, Canada, New Zealand, the United Kingdom and the United States of America fulfill the requirement of the National Medical Commission regulations that include the period of education, subjects, and training in various disciplines as per the CBME curriculum, including the Family Adoption programme?

I believe that none of the above countries follow any of the Gazette Notification guidelines or requirements issued by the National Medical Commission and these too must be considered at par with other countries.

Why is there discrimination between Australia, Canada, New Zealand, the United Kingdom, the United States of America, and many other countries where Indian students used to go for Medical studies through nominations by the Government of India?

CHAPTER – V

Compulsory Rotating Medical Internship for Foreign Medical Graduates

The National Medical Commission **Compulsory Rotating Medical Internship Regulations, 2021** dated 18.11.2021 **READS** - Medical colleges or institutions may allow up to 7.5 per cent of their permitted quota of interns to accommodate internship by Foreign Medical Graduates.

FAQ'S - National Medical Commission **Compulsory Rotating Medical Internship** Regulations 2021 dated 05.05.2022 **READS** – The internship shall be completed within 2 years of passing the Final MBBS or Foreign Medical Examination (FMGE) or NExT Step-1 Examination, whenever in force.

The National Medical Commission **National Exit Test Regulations, 2023** dated 27.06.2023; **READS** – There is no restriction to the number of attempts to appear in NExT Step-1 provided the candidate has passed both NExT Step-1 and NExT Step-2 Examination within 10 years of joining the MBBS Course.

So, the National Medical Commission Regulations directly say that a student must

- (i) Qualify **NExT Step-1** in the 8th year from the date of joining the MBBS equivalent course abroad.
- (ii) Complete the **Compulsory Rotating Medical Internship** in the 9th year from the date joining the MBBS equivalent course abroad and
- (iii) Qualify **NExT Step-2** in the 10th year from the date of joining the MBBS equivalent course abroad.

As we know every student will not be accommodated for Compulsory Rotating Medical Internship immediately after qualifying **NExT Step-1** because of the cap on several seats for Compulsory Rotating Medical Internships for Foreign Medical Graduates.

It is too harsh for Foreign Medical Graduates having only 7.5% seats reserved for Compulsory Rotating Medical Internships in India.

It is going to be difficult for Foreign Medical Graduates to appear for **NExT Step-2** within **2 years of passing the Final MBBS or Foreign Medical Graduates Examination (FMGE) or Next Step-1** Examination failing which his or her whole period of education can be termed as null and void by the National Medical Commission.

I request the National Medical Commission to review the Gazette Notifications issued on and after 18.11.2023 to make the necessary amendments to remove the cap of 10 years for Foreign Medical Graduates to appear for the **NExT Step-1**, Compulsory Rotating Medical Internship and **NExT Step-2** examination else issue a public notification telling the aspirants not to go abroad at all.

CHAPTER – VI
(THE NATIONAL MEDICAL COMMISSION)
FAQ's FROM THE NATIONAL MEDICAL EDUCATION REGULATOR

FAQ's are being issued by the National Medical Commission from time to time with the Disclaimer stating: These FAQ's are in the nature of explanation for ease of understanding of the general public and cannot be upheld in a court of law. Please refer to the relevant gazette notifications for legal validity.

Since the National Medical Commission is putting disclaimer on its own explanation of the rules and regulations formulated by the National Medical Commission itself; who else can be able to tell the aspirants about the correct explanation or interpretation of the rules and regulations formulated by the National Medical Commission?

Honestly as discussed above there is inconsistency and contradictions in various notifications and publications leading to a confused interpretation and explanation.

All the concerned and affected by the new rules and regulations as issued by the National Medical Commission are medical students, aspiring doctors and they cannot understand legal language but only simple language as used in the FAQ's.

- On one side the National Medical Commission, the regulator, is issuing gazette notifications and formulating laws to govern medical education in India and abroad for Indian students.
- On the other side issuing FAQ's with disclaimers without any responsibility of explanation of own explanations.
- None other than the National Medical Commission knows the actual meaning of the rules and regulations formulated by the National Medical Commission except the National Medical Commission.

- By putting notifications one can understand that the National Medical Commission does not want students to go abroad for medical education and is indirectly trying to tell the same.
- The way the National Medical Commission is issuing the notifications will not stop aspirants from going abroad but will impose huge loss of -
 - ✓ Precious time for aspiring students'/doctors' careers,
 - ✓ Loss of huge amount spent by their parents and
 - ✓ Extremely huge Forex reserves of the country

It is expected that the regulator shall have a deeper understanding of the impact of the policies rules and regulations before making them public because these regulations will have a serious impact on the thousands of young Indian medical aspirants.

The fundamental responsibility of the regulator, the National Medical Commission, is to formulate the rules & regulations for medical education and at the same time to educate about the meaning of such laws to the public through various means before their implementation.

In the absence of the proper and legally valid interpretation of the Regulations, the future of thousands of Indian Medical Aspirants is at risk.

Guidance to students going abroad for medical education must come from a government source, not any private source or medical institutions abroad; it has to be only the National Regulator that is the National Medical Commission.

Kindly do the needful to remove the anomalies that could harm the career of Foreign Medical Graduates; they are also Indian Citizens dreaming of serving humanity.

I request the National Medical Commission to review the Gazette Notifications issued by the National Medical Commission as well as **all the active Gazette Notifications** issued by the erstwhile Medical Council of India to make it better and easier for aspiring doctors.

Sincerely Yours,

Ravi Kumar Koul

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19.12.2023 to Dr. Vipul Aggarwal, Secretary, NMC.pdf

556K



RAVI KUMAR KOUL <koulravikumar@gmail.com>

Appointment for a one to one Meeting

1 message

Ravi Kumar Koul <koulravikumar@gmail.com>

Mon, Jan 15, 2024 at 2:03 PM

To: dr.vipul@nic.in, secy-mci@nic.in, grievance cell NMC <grievance_cell@nmc.org.in>

Bcc: RAVI KUMAR KOUL <koulravikumar@gmail.com>

To

15.01.2024

Dr. Vipul Aggarwal

Secretary,

National Medical Commission (NMC)

Joint Secretary (Medical Education),

MoHFW, Govt of India

New Delhi

Through: by hand & Email to:dr.vipul@nic.in; secy-mci@nic.in; grievance_cell@nmc.org.in**Sub:** - Appointment for a one to one Meeting

Respected Sir,

This is in continuation to my letter sent to you through email dated 19.12.2023 followed by hard copy delivered personally for your perusal at the National Medical Commission by hand on 21.12.2023..

I have compelling reasons for writing the letter and email dated 19.12.2023.

It's quite possible that all through my written communications I may not have been able to press the urgency to deal with this matter of public interest.

So, I request you to give me an appointment for a one to one meeting. I would like to make a brief presentation to you about the need for all I have written.

I will be highly obliged and indebted for my whole life if you will allow me a few minutes of meeting to allow me to express my aim behind these letters, RTI applications and emails.

Sincerely Yours,

Ravi Kumar Koul

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Encl.:

1. Copy of this letter in pdf format
2. copy of email dated 19.12.2023 in pdf format

2 attachments

 **Copy of Email dated 19.12.2023 to Dr. Vipul Aggarwal, NMC.pdf**
313K

 **15.01.2024 to Dr. Vipul Aggarwal, NMC.pdf**
384K