

27<sup>th</sup> March 2019

Dear Postgraduate Training Bodies,

The Medical Council has been advancing the monitoring of registered doctor's requirement to maintain their professional competence.

The Medical Council's Registration and Continuing Practice Committee (Committee) determined that the 2019 declaration will focus on Scheme enrolment and compliance in CPD activity. Thus, during the 2019 retention process, RMPs will be asked to declare the following under ARAF Question 1 (**Appendix 1**):

- *'I am enrolled in a professional competence scheme in Ireland and have paid my Scheme enrolment fee for the Scheme year 2019 – 2020 [Tick Box]*

AND

- *I am maintaining professional competence pursuant to CPD requirements [YES/NO].*

The Medical Council will phase-in its management of monitoring CPD compliance.

In 2019:

1. A CPD compliance component will be reintroduced to the Maintenance of Professional Competence declaration in the ARAF;
2. Information about this change will be circulated to RMPs by the Medical Council and by the PGTBs;
3. Non-compliance data will be sent to the Medical Council by PGTBs to facilitate data analysis and testing to determine to non-compliant pool;
4. Non-compliant RMPs will be contacted by the Medical Council and will be given every opportunity to become compliant during the 2019 – 2020 Scheme Year, facilitated by their Professional Competence Scheme and employer.

In 2020, the ARAF Maintenance of Professional Competence declaration will be modified to the following:

- *'I am enrolled in a professional competence scheme in Ireland and have paid my Scheme enrolment fee for the Scheme year 2019 – 2020 [Tick Box]*

AND

- *My annual Statement of Participation as of April 2020 demonstrates that I am meeting my ongoing maintenance of professional competence requirements. [YES/NO]*

The new mechanism to monitor CPD compliance contained in Appendix 2 will also be implemented in 2020.



## **1. Information required from PGTBs in June 2019:**

We will be requesting all PGTBs to provide the following:

1.1 IMC registration numbers and names of RMPs who have not met their requirements in terms of CPD credits accrued over the categories (internal, external, personal learning, research/teaching) as per their Statement of Participation. This list should exclude those RMPs who have reported extenuating circumstances or provided evidence that they are on:

- Sick leave (which is certified and is greater than three months in duration); or
- Maternity leave; or
- Carers leave; or
- Parental leave; or
- Bereavement leave;

OR have:

- Moved overseas and are predominantly practising overseas (and less than 30 days per year in Ireland); or
- Enrolled in the Scheme part way through the Scheme year (for instance in the case of RMPs who recently have come to Ireland); or
- Moved into an approved training programme (including an Out of Clinical Experience Programme).

The 105 RMPs who are already being monitored for not recording any CPD credits should be included in a separate report as per below, and also provided in June (instead of August as previously indicated).

1.2 A report on the 105 RMPs who are already being monitored for not recording any CPD credits over the last three consecutive years despite being enrolled in a Scheme. This report should state whether these 105 RMPs are now compliant with the CPD activity requirement at the end of the Scheme Year 2018 – 2019.

1.3 RMPs who have not complied with the clinical /practice audit requirement but have met all other CPD activity requirements should be removed from both lists. Given the current lack of clarity on the General Data Protection Regulation implications on clinical/practice audit, the Committee also agreed that for this year, non-compliance with the clinical/practice audit requirement will not be monitored. In the meantime, the Medical Council is seeking external legal opinion on this issue and hopes to publish more advice on the same in due course.

## **2. Maintenance of Professional Competence Audit**

The Medical Council will compare the information provided by the PGTBs with RMPs' ARAF declaration on maintenance of professional competence:



- All non-compliant RMPs will be directed by the Medical Council to demonstrate they are meeting the requirements by the end of the Scheme year 2019 – 2020. They will be directed to their respective Scheme and given every reasonable opportunity to become compliant. PGTBs will not be expected to set up one-on-one meetings for all non-compliant RMPs. PGTBs should determine this need on a case-by-case basis including the necessity for doctors to develop a PDP.

RMPs who have declared that they are overseas through the ARAF, or those who are now on the Trainee Specialist Division will be removed from the non-compliant RMP list.

- In the case of the 105 RMPs already being monitored for failing to record CPD over three consecutive years, those RMPs who have become compliant by the end of the Scheme year 2018 - 2019 will be included in the PGTB verification process. Those who are not compliant will be reported by the PGTBs to the Medical Council on an individually named basis and will be escalated as a possible complaint for failure to become compliant following one year of support.

### **3. Awareness Raising on the ARAF Change**

We would ask that you circulate the letter in **Appendix 3** to RMPs enrolled in your Schemes so that they are informed of this change. The Medical Council will also be circulating alerts of this change through its annual retention letter and through Medical Council media.

Should you have any queries relating to the above, please contact us.

Kind regards,

**Jantze Cotter**  
**Professional Competence and Research Director**  
**Medical Council**



## APPENDIX 1: REVISED ARAF FOR 2019 – Q1 ON MAINTENANCE OF PROFESSIONAL COMPETENCE

Since 2011, all doctors on the General, Specialist and Supervised Division of the Medical Council register have a legal duty to demonstrate ongoing maintenance of professional competence, regardless of practice arrangements. Please complete **ONE** of the following options in relation to your maintenance of professional competence:

**1a. I am enrolled in a Professional Competence Scheme in Ireland and have paid my Scheme enrolment fee for the Scheme year 2019 - 2020 [TICK BOX]**

- Please select which Professional Competence Scheme you are enrolled in [MENU OF PGTBs]
- Please write the date on which you paid your Professional Competence Scheme enrolment fee for 2019-20 below: [DD/MM/2019]

**AND**

**1b. I am maintaining professional competence pursuant to CPD requirements [YES/NO].**

2. I am based overseas, and don't intend to practise medicine in Ireland for more than 30 days this year, and will be maintaining my professional competence overseas [TICK BOX]
3. I am, or will shortly be, registered in the Trainee Specialist Division [TICK BOX]

### POP UP BOXES

To select this option you must have paid your Professional Competence Scheme enrolment fee for 1 May 2019 to 30 April 2020.

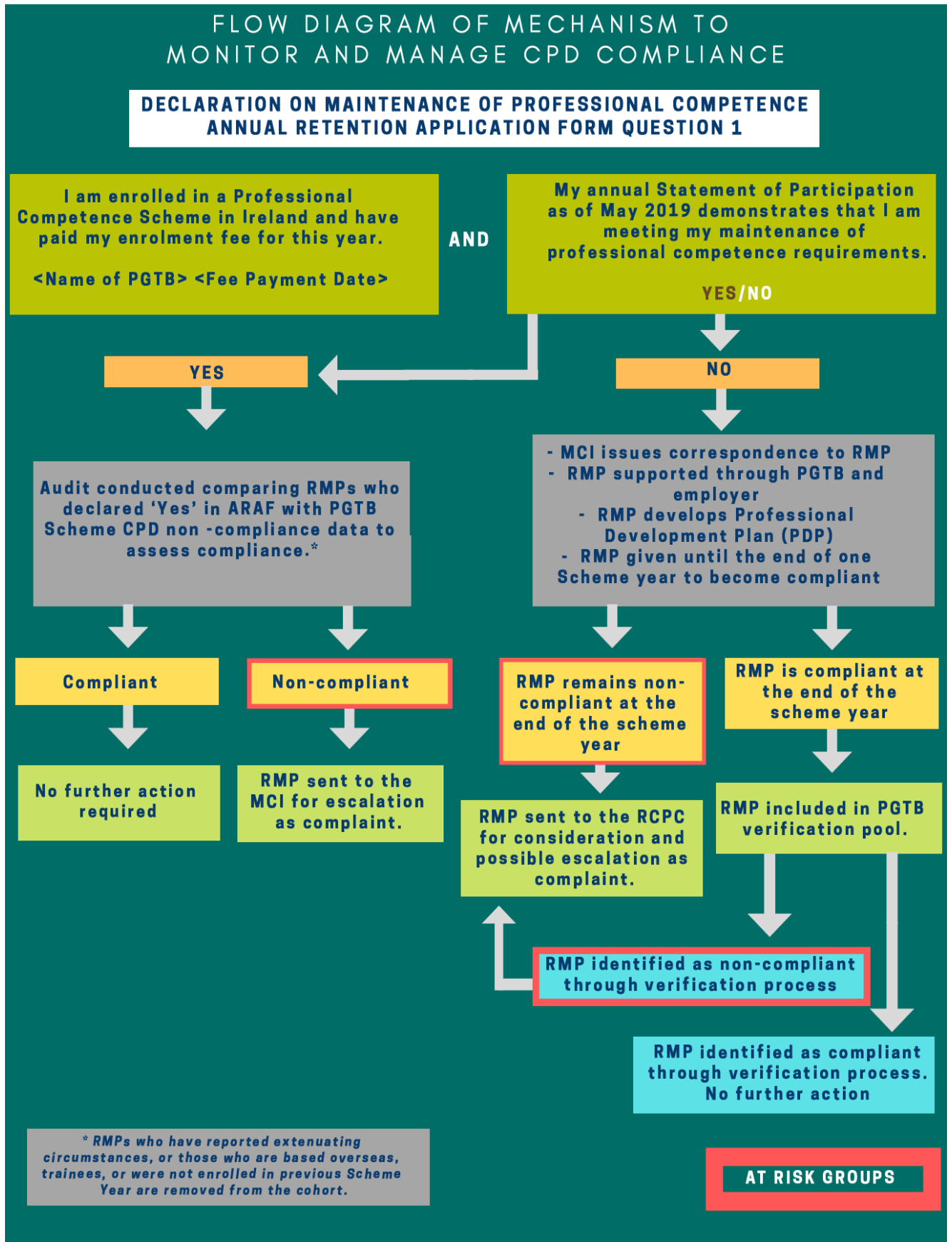
For a registered medical practitioner to certify that they have completed their CPD requirements when such is not the case, may result in the registered medical practitioner facing an allegation of professional misconduct.

The Medical Council will cross-check the information you provide in this declaration against information from the Postgraduate Training Bodies.

The Medical Council may at any time require you to provide evidence of your ongoing maintenance of professional competence.



APPENDIX 2: FLOW DIAGRAM OF MECHANISM TO MONITOR AND MANAGE CPD COMPLIANCE IN 2020





### APPENDIX 3: LETTER TO RMPs REGARDING THE ARAF CHANGE

Dear Doctor,

During the 2019 retention of registration process, you will be asked to declare the following:

- *'I am enrolled in a professional competence scheme in Ireland and have paid my Scheme enrolment fee for the Scheme year 2019 – 2020 [TICK BOX]*

AND

- *I am maintaining professional competence pursuant to CPD requirements [YES/NO].*

The second and third option under ARAF Question 1 will remain the same:

- *I am based overseas, and don't intend to practise medicine in Ireland for more than 30 days this year, and will be maintaining my professional competence overseas [TICK BOX]*
- *I am, or will shortly be, registered in the Trainee Specialist Division [TICK BOX]*

If you have recently moved overseas, please ensure you notify your Postgraduate Training Body of this.

Please note that in 2020, you will be asked to declare the following during your retention of registration process:

- *'My annual Statement of Participation as of May 2020 demonstrates that I am meeting my ongoing maintenance of professional competence requirements.'* [YES/NO]

The Medical Council will be monitoring your compliance with CPD requirements as defined in the Medical Practitioners Act 2007 in 2020.

If you have any queries regarding this, please contact your Postgraduate Training Body for further information.

Kind regards,

Postgraduate Training Body