

**Annexure**

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राष्ट्रीय आयुर्विज्ञान आयोग  
National Medical Commission  
(Undergraduate Medical Education Board)

**Subject: Clarification on offline compensation for online study of FMGs as per NMC Public Notice dated 19.06.2024-Reg.**

It is pertinent to note that medical education is a specialized and highly regulated domain that directly influences the quality of healthcare delivery in the country. Unlike many other fields of study, medical education is not confined to academic knowledge alone; it involves the cultivation of clinical skills, ethical responsibility, and the capacity to make life-saving decisions. Further, doctors and other medical professionals trained through such educational programs are entrusted with the health and lives of patients; any compromise in the standards of medical education can have far-reaching and potentially irreversible consequences for society at large. The National Medical Commission (NMC) serves as the apex regulatory body responsible for overseeing medical education and practice in India. Hence, full compliance with medical education regulations remains critically essential to uphold the integrity and safety of healthcare delivery.

2. In the past few years, it has been observed that a significant number of medical aspirants choose to pursue medical education abroad. To regulate such Foreign Medical Graduates (FMGs), who travel to other countries to pursue medical courses equivalent to the MBBS program in India and later return to India to practice in the Indian hospitals, the National Medical Commission (NMC) introduced the Foreign Medical Graduate Licentiate Regulations, 2021 (FMGL, 2021), which was notified on 18.11.2021.

Simultaneously, the Compulsory Rotating Medical Internship Regulations, 2021 (CRMI, 2021) was also notified on the same date. These regulations aim to subject FMGs to thorough scrutiny and ensure they attain clinical skills equivalent to those of Indian Medical Graduates. Upon successful completion of the mandatory CRMI and satisfying the prescribed evaluation criteria, FMGs become eligible for permanent registration to practice medicine in India.

3. That around the year 2020, owing to the unforeseen circumstances that arose due to the COVID-19 pandemic, followed by the Russia-Ukraine war, which left a global impact, causing many Indian medical students from all over the country to return to India. Consequently, many

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of these Foreign Medical Graduates (FMGs) were found to have completed a portion of their medical education through online mode and are now seeking permanent registration in India.

4. To curb the abovementioned practices, the UGMEB, in alignment with the guiding principles enshrined in the FMGL, 2021, and with the overarching objective of preserving the quality and standards of medical education in the country, issued a Public Notice dated 07.12.2023. Through this notice, it was clarified that in cases where the FMGs had a break and the medical course has been pursued in the online mode, *the concerned FMG will be required to undergo either a two-year clerkship or a one-year clerkship, as applicable, followed by the mandatory one-year internship prescribed under the Compulsory Rotating Medical Internship (CRMI) Regulations, 2021.*

Subsequently, by way of Public Notice dated 19.06.2024, UGMEB further clarified that all students who have **sufficiently compensated** classes in physical onsite in lieu of the online classes and subsequently passed examination equivalent to MBBS in India, shall be eligible for one year mandatory internship in India as specified in the CRMI Regulations 2021.

5. The backdrop of issuance of Public Notice dated **07.12.2023** and **19.06.2024** arises from the growing concern with respect to FMGs completing some part of their medical education through online mode. That, to uphold the quality and standards of medical education, to discourage the casual pursuit of such practices and to ensure strict adherence to the sanctity of the regulations prescribed by the NMC, the UGMEB, vide above-mentioned public notices, mandated the **adequate compensation** of the classes studied through online mode by the FMGs, which requires **adequate compensation (i.e. attending the remaining duration of the curriculum in physical mode in the parent foreign medical institute)** for the **remaining duration** of the medical education that was studied by the FMG through online mode or has not studied the remaining duration at all.

6. The core intent behind the requirements outlined in the referenced public notices is to uphold the quality and integrity of medical education, especially in the context of Foreign Medical Graduates (FMGs). These notices recognize that certain FMGs may have completed a portion of their medical education through online mode, particularly during exceptional circumstances such as the COVID-19 pandemic. Others may have failed to complete the required duration of study altogether. **Given that online learning lacks the crucial component of in-person clinical training, an essential part of medical competency, the commission has mandated these measures to compensate for the equal duration of the course studied via online mode.** The goal is not punitive but corrective to ensure that all FMGs attain a level of practical and clinical knowledge at par with the standards expected in India. This approach ultimately safeguards public health while providing FMGs with a clear, structured path to become eligible medical practitioners in the country.

7. In light of the above regulations and the public notices issued by NMC, the queries raised in the above DO letter have been clarified as under:



Sl. No.	Query	Clarification
I.	Whether the online period of any duration in one academic year can be compensated along with academics of the next year offline without extension of study period?	<p>The primary objective of the public notices dated 07.12.2023 and 19.06.2024 is to ensure that any portion of the medical education undertaken by Foreign Medical Graduates (FMGs) through online mode, particularly during periods of global disruption like COVID-19, is adequately compensated through in-person clinical and academic training. This is essential because medical education, by its very nature, requires substantial hands-on learning, clinical exposure, and practical experience, which cannot be effectively substituted by virtual instructions alone.</p> <p>Therefore, any FMG who studied a portion of their course online is required to undergo equivalent in-person training to make up for that duration. In this context, foreign medical institutions that issue a "compensation certificate" without actually extending the period of study and without ensuring that the additional training has occurred in physical mode are acting in contradiction to the intent and requirements of the FMGL Regulations. Such certificates, issued without genuine compensation and extension of study period, undermine the very spirit and purpose of the FMGL Regulations, 2021, which aim to uphold the integrity and quality of medical education for practitioners intending to practice in India.</p> <p>Under <b>Schedule-I of the Foreign Medical Graduate Licentiate Regulations, 2021</b>, notified on <b>18.11.2021</b>, it is clearly stated:</p> <p><i>"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 recognized by the Commission under sub-section (2) of section 61 of the Act."</i></p> <p>This clause emphasizes that:</p> <p>The <b>structure, duration, and content</b> of foreign medical courses must be equivalent to the Indian MBBS</p>

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		<p>curriculum.</p> <p>The course must <b>include sufficient hands-on clinical training.</b></p> <p><b>Online-only education cannot be considered equivalent</b> unless the missed components are physically compensated for.</p> <p>Institutions must ensure <b>compliance with both curriculum and practical standards</b>, failing which FMG qualifications may not be recognized in India.</p>
II.	Should the compensation certificate contain details of academics that are extended in order to compensate for the period of online study with offline mode?	<p>It is imperative to verify the authenticity of the claim of Foreign Medical Graduate's (FMG) regarding the offline <b>compensation</b> of the remaining duration of the medical course, <b>which must include both theoretical and practical components.</b> Accordingly, the compensation certificate issued by the concerned foreign medical institution must clearly specify the details of the subjects and its duration completed by the FMG.</p> <p>Furthermore, the transcript of record issued by the university/medical institution, must be duly apostilled, and authenticated by the Indian Embassy or High Commission in the respective country; to ensure its legitimacy and compliance with regulatory requirements.</p>
III.	Can two academic years, curriculum training be done in one year offline study?	No. Clarification has already been furnished as above.

8. It is important to underscore that the primary responsibility for processing applications of Foreign Medical Graduates (FMGs), particularly those falling under the categories specified above, in accordance with the provisions of the FMGL Regulations, 2021, and the CRMI, 2021, lies solely with the respective State Medical Councils (SMCs). These Councils are entrusted with ensuring that all applications are thoroughly reviewed for compliance with the applicable regulatory framework.

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9. It is significant to clarify that while processing such applications, the SMCs shall verify and satisfy itself that the Foreign Medical Graduate (FMG) has duly completed the compensatory academic requirements comprising both theory and practical components, at the same foreign medical institution; which should be corroborated from the visa stamping & entry/exit records on passport, FMGE pass certificate issued by NBEMS (National Board of Examinations in Medical Sciences) etc. Subsequently, such FMGs must complete one-year compulsory internship in India, as prescribed under the CRMI, 2021, for grant of permanent registration by the SMC.

a. The proposed application may be based on the ground that, upon examination of the documents submitted by the petitioners, it appears they have not adequately compensated the online components of their medical education through offline, in-person training as mandated.

b. In the present case, while acting in accordance with the High Court's order, the APMC had written to the Indian Embassy in Kyrgyzstan for verification of the concerned documents and factual position. However, as appeared from the repeated reminders sent by APMC to Indian Embassy, no response has been received from the Embassy to date, and the deadline for complying with the Court's directions is fast approaching.

**c. This outcome would result in arbitrary relaxation of the regulatory requirements prescribed by the National Medical Commission (NMC). It is important to highlight that the NMC has laid down uniform standards to ensure the integrity and quality of medical education, and these standards include the requirement of regular, structured, and time-bound academic training.**

d. Since the petitioners intend to practice medicine and treat patients in India, it becomes crucial to verify whether they have undergone their medical education in **full compliance** with the **prescribed curriculum and through a regular, uninterrupted academic pathway**. Any dilution in this regard may have serious implications for public health and medical safety, which the regulatory framework seeks to safeguard.

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11. In view of the critical importance of medical education which has a specialized and stringently regulated domain that has a direct bearing on the quality of healthcare delivery in the country, as explained in above paras, it is imperative that the objectives underlying the requirements stipulated under the FMGL, 2021 and the CRMI, 2021, as further reinforced through the Public Notices dated 07.12.2023 and 19.06.2024, are given due prominence and strict adherence while granting registration to medical graduates, in whose hands the responsibility of delivering healthcare services will be entrusted.

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