

To,

03.07.2023

**Mr. Anil Kumar Radadiya,**  
**Addl. P.S. to the Health & Family Welfare Minister,**  
The Government of India  
Room No. 349; 'A' Wing,  
Nirman Bhavan,  
New Delhi-110011, INDIA

**Subject – Scheduled meeting.**

**Reference: Telephonic call from your office on 22.06.2023.**

Dear **Respected Sir,**

This is to remind you of my email 26.06.2023 that was sent to you as I had received a call from your office on 22.06.2023 for a meeting scheduled for 26th or 27th June 2023 with you, in reference to my letter for appointment to the Hon'ble Health & Family Welfare Minister.

I was directed to call the same number on either on 26th or 27th June 2023 to confirm the date and time.

As was advised I called the number +91 11 23063513 for the same on 26th as well as 27th June 2023 multiple times to confirm the date and time.

Though I talked on the number several times but could not get a confirmed response from the officer who picked up the call, every time he told me to call after sometime.

**Respected Sir, could you please advice me what date and time I can visit your office for the proposed meeting.**

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](mailto:koulravikumar@gmail.com)



RAVI KUMAR KOUL &lt;koulravikumar@gmail.com&gt;

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**Foreign Graduate Medical Education**

1 message

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**Ravi Kumar Koul** <koulravikumar@gmail.com>

Mon, Jul 17, 2023 at 11:11 PM

To: anil.radadiya@gov.in

Bcc: RAVI KUMAR KOUL &lt;koulravikumar@gmail.com&gt;

To,

17.07.2023

**Mr. Anil Kumar Radadiya,**  
**Addl. P.S. to**  
**The Health & Family Welfare Minister,**  
The Government of India  
Room No. 349; 'A' Wing,  
Nirman Bhavan,  
New Delhi-110011, INDIA

Subject: - **Foreign Graduate Medical Education.**

Dear **Respected Sir,**

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

Not even a single letter written by me is or was for my personal/ individual benefit but for the benefit of the public, the aspiring doctors, their parents and my own 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. A proper advisory or notification in a simple language (not legal language) from the National Medical Commission or the Ministry of Health and Family Welfare can be the best guide for both the parents and the aspiring doctors.

**After the promulgation** of “NMC (National Medical Commission) Gazette Notification - Foreign Medical Graduate Licentiate Regulations 2021” (**FMGL - 2021**) I continued to educate the aspiring medical students against going for Medical Education Abroad; as I had received replies to my emails from various Indian Embassies abroad and could find that most of the countries are not following **FMGL – 2021** as I saw it.

Respected Sir, the “**NMC (National Medical Commission); Foreign Medical Graduate Licentiate Regulations 2021**” will surely upgrade the quality of Medical Education & Health System in India; but I would like to draw your attention towards some critical reference points that would need your attention.

There seems to me a desperate attempt by the almighty agents to satisfy the FMGL Regulations without any consideration of parity with local students of these countries.

**NMC framed these policies to block the malpractices by frivolous agents to prevent sending back the partially educated clinically weak students to India that is why poor FMGE passing results.**

If a country abroad cannot teach our students in parity with local students, this is a clear case of manipulation by the institutions as a part of a bigger conspiracy to keep creating a trap for thousands of Indian students, making billions of dollars thereby cleverly making a fool of all.

Respected Sir, with all my humility and consciousness I request you to (the Ministry of Health and Family Welfare) to coordinate between the National Medical Commission and the Indian Missions Abroad to get to the core of the subject to protect the lives and innocent aspirations of our students and seek an immediate clarity from the concerned.

These doctors are spending huge Indian money and are going to serve our country tomorrow; so please take care at the highest level so that **they become proper doctors not Nursing Assistants.**

Need of the hour is an Indian official reliable source from where these students can get proper information & guidance to fulfill their dream from a proper place and institution.

Dear Respected Sir, I want the National Medical Commission or the Ministry of Health and Family Welfare to issue an advisory notification in reply to THREE questions as mentioned below; that could save thousands of students from being misled to various destinations abroad and also save a huge Forex of the Country as well.

#### CRITICAL REFERENCE POINT NO. 01

**“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. 01

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

1. His / her Degree must be Registrable in the country abroad  
**OR**
2. He or she must be eligible to register as a medical practitioner in the country abroad  
**OR**
3. He or she must be registered as a medical practitioner in the country abroad  
**OR**
4. He or she must possess License to Practice as junior doctor  
**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 the aspiring Indian medical students.

### CRITICAL REFERENCE POINT NO. 02

**“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;

**THIS IS ABOUT INTERNSHIP ABROAD** and the confusion has been created by many including as is mentioned in Advisories issued by various Indian Embassies abroad on their websites, while explaining students about the Practical Training / Clinical Rotation/ Clerkship / Internship in 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;** 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 by the National Medical Commission 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. 02**

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 or RTI replies is valid as desired Internship for licensing in India or not.

**CRITICAL REFERENCE POINT NO. 03**

**"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. 03**

What does **The Total Duration of the Foreign Medical Graduation Course** shall be completed within ten years from the date of joining the course **mean** –

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 us know the same please for the information and benefit of the aspiring Indian medical students.

Here the students are going to be big Losers (losing the precious time of their career) and their parent's money (huge funds) and above all the **Huge Forex of our country.**

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 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 / year there will be a loss of approximately **1,890,000,000 USD** of **FOREX** to the India between 2021 to 2027.

### CALCULATIONS OF THE EXPECTED FOREX LOSS TO INDIA FROM 2021 TO 2027

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

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
<b>Total Spent by 2021 batch till 2027</b>	<b>540000000</b>	<b>USD</b>

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

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
<b>Total Spent by 2022 batch till 2027</b>	<b>450000000</b>	<b>USD</b>

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

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
<b>Total Spent by 2023 batch till 2027</b>	<b>360000000</b>	<b>USD</b>

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

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
<b>Total Spent by 2024 batch till 2027</b>	<b>270000000</b>	<b>USD</b>

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

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
<b>Total Spent by 2025 batch till 2027</b>	<b>180000000</b>	<b>USD</b>

#### Calculation of Students batch 2026 to 2027 (for 1 years)

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
<b>Total Spent by 2026 batch till 2027</b>	<b>90000000</b>	<b>USD</b>

<b>Total Loss of Foreign Exchange from 2021 up to 2027</b>	<b>1890000000</b>	<b>USD</b>
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To save these aspirants from such a situation, I request the Ministry of Health & Family Welfare; the National Medical Commission; Indian Missions abroad to coordinate together to educate the students about –

- ❖ Which **country** Indian students can go to?
- ❖ Which **institution** Indian students can go to?

### **THAT WILL SAVE OUR COUNTRY FROM A BIGGER DISASTER IN MAKING.**

**YEAR 2027** – 1st batch of 15000 Foreign Medical Graduates under Foreign Medical Graduate Licentiate Regulations 2021; with valid or invalid degrees will be returning to India. Today no one knows which country, which institution degree is recognized in India so most of them may need to go for litigations in 2027.

The only way to save our country from such an impending disaster is to release answers to all three concerns above with proper guidance and guidelines for aspiring medical students by the National Medical Commission or the Ministry of Health & Family Welfare for the benefit of the whole country.

**Fresh admissions are on & approximately 15000 to 20000 students are expected to fly in near future.**

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

Look forward to your quick action and wish to meet you soon for the good.

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](mailto:koulravikumar@gmail.com)



**17.07.2023 Mr. Anil Kumar Radadiya, Addl. P.S. to MoHFW.pdf**  
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RAVI KUMAR KOUL &lt;koulravikumar@gmail.com&gt;

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**Thank you**

1 message

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**Ravi Kumar Koul** <koulravikumar@gmail.com>

Tue, Aug 8, 2023 at 8:12 PM

To: anil.radadiya@gov.in

Bcc: RAVI KUMAR KOUL &lt;koulravikumar@gmail.com&gt;

Respected **Mr. Anil Radadiya**,

Thank you very much from the core of my heart for **"08/08/2023 – Advisory / alert for Indian students seeking admission in foreign Institutes/Universities for Undergraduate Medical Courses"** released today by the National Medical Commission.

Thank you for saving the huge money of innocent aspirants, huge Forex of the Country and career of a large number of students.

**Wish I could visit the office personally to thank you for this desperately needed advisory;** if possible kindly do allow me to visit you for exactly less than 5 minutes on any day after 15.08.2023.

May God bless you with the BEST in life!

With best wishes from

**Ravi Kumar Koul**

Plot No 21; Pocket 1; Ground Floor;

Ramprastha Greens,

Sector 7; Vaishali,

Ghaziabad; Uttar Pradesh

INDIA Pin 201010

EMAIL: [koulravikumar@gmail.com](mailto:koulravikumar@gmail.com)

Mobile & WhatsApp Number **+91 9999155591**

[https://twitter.com/Ravi\\_Kumar\\_Koul](https://twitter.com/Ravi_Kumar_Koul)



RAVI KUMAR KOUL &lt;koulravikumar@gmail.com&gt;

**CORRECTION in Thank you for Clarification on various issues relating to Foreign Medical Graduates (FMG's)**

1 message

**Ravi Kumar Koul** <koulravikumar@gmail.com>

Wed, Nov 22, 2023 at 8:18 PM

To: anil.radadiya@gov.in

Bcc: RAVI KUMAR KOUL &lt;koulravikumar@gmail.com&gt;

To,

22.11.2023

**Mr. Anil Kumar Radadiya,****Addl. P.S. to****The Health & Family Welfare Minister,**

The Government of India

Room No. 349; 'A' Wing,

Nirman Bhavan, New Delhi-110011, INDIA

Email [anil.radadiya@gov.in](mailto:anil.radadiya@gov.in)Sub: - **Clarification on various issues relating to Foreign Medical Graduates (FMG's).**

Respected Sir,

Sorry Sir, I had typed Madam in place of Sir, Sorry Again.

Thank you for a detailed Clarification on various issues relating to Foreign Medical Graduates (FMG's) dated 22/11/2023.

Sincerely Yours,

**Ravi Kumar Koul**

Plot No 21; Pocket 1; Ground Floor;

Ramprastha Greens,

Sector 7; Vaishali,

Ghaziabad; Uttar Pradesh

INDIA Pin 201010

Mobile & WhatsApp Number **+91 9999155591**EMAIL [koulravikumar@gmail.com](mailto:koulravikumar@gmail.com)





RAVI KUMAR KOUL &lt;koulravikumar@gmail.com&gt;

**(no subject)**

1 message

**Ravi Kumar Koul** <koulravikumar@gmail.com>

Mon, Nov 27, 2023 at 11:00 AM

To: anil.radadiya@gov.in

Bcc: RAVI KUMAR KOUL &lt;koulravikumar@gmail.com&gt;

To,

27.11.2023

**Mr. Anil Kumar Radadiya,****Addl. P.S. to****The Health & Family Welfare Minister,**

The Government of India

Room No. 349; 'A' Wing,

Nirman Bhavan,

New Delhi-110011, INDIA

**Email -** [anil.radadiya@gov.in](mailto:anil.radadiya@gov.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](mailto:koulravikumar@gmail.com)

7/12/24, 9:02 PM

Gmail - (no subject)



**27.11.2023 Mr. Anil Kumar Radadiya, Addl. P.S. to MoHFW.pdf**  
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RAVI KUMAR KOUL &lt;koulravikumar@gmail.com&gt;

**MOST URGENT & PRIORITY PLEASE**

1 message

**Ravi Kumar Koul** <koulravikumar@gmail.com>

Thu, Nov 30, 2023 at 3:09 PM

To: anil.radadiya@gov.in

Bcc: RAVI KUMAR KOUL &lt;koulravikumar@gmail.com&gt;

**MOST URGENT & PRIORITY PLEASE**

To,

30.11.2023

**Mr. Anil Kumar Radadiya,****Addl. P.S. to****The Health & Family Welfare Minister,**

The Government of India

Room No. 349; 'A' Wing,

Nirman Bhavan, New Delhi-110011, INDIA

**Email -** [anil.radadiya@gov.in](mailto:anil.radadiya@gov.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](mailto:koulravikumar@gmail.com)



7/12/24, 9:03 PM

Gmail - MOST URGENT & PRIORITY PLEASE



**30.11.2023 Mr. Anil Kumar Radadiya, Addl. P.S. to MoHFW.pdf**  
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RAVI KUMAR KOUL &lt;koulravikumar@gmail.com&gt;

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

1 message

Ravi Kumar Koul &lt;koulravikumar@gmail.com&gt;

Tue, Dec 19, 2023 at 8:57 PM

To: anil.radadiya@gov.in

Bcc: RAVI KUMAR KOUL &lt;koulravikumar@gmail.com&gt;

**SPEED POST & EMAIL**

To,

19.12.2023

**Mr. Anil Kumar Radadiya,**  
**Addl. P.S. to the Health & Family Welfare Minister,**  
The Government of India,  
Room No. 349; 'A' Wing,  
Nirman Bhavan,  
New Delhi-110011.

Through: - Speed Post & Email - [anil.radadiya@gov.in](mailto:anil.radadiya@gov.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 with the Secretary National Medical Commission 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 allowing me to meet you in your office on 11.12.2023.

This letter is in continuation of the points I raised in my previous 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.

I am hoping you will discuss concerns raised by me in this letter with all the concerned and resolve the inconsistencies and contradictions in various notifications from the National Medical Commission.

**I wholeheartedly welcome the Hon'ble Health and Family Welfare Minister of India and the National Medical Commission on 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 in **CHAPTERS - I to VI** 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 in an online video conference with the Secretary, the National Medical Commission agreed to my point that the Public Notices and the FAQ's cannot supersede any Gazette Notification.

Sir, the Secretary, National Medical Commission 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 FAQs issued on 22.11.2023, 07.12.2023 and 11.12.2023.

We still observe that the public notices and FAQs 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 Hon'ble Health and Family Welfare Minister of India and 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 main course abroad for a period of 6 years followed by a minimum 1 year of internship in 10 years (that was practically, logically possible and correct).

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**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 of 4.5 years.

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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
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- 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
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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

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✓ **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)**

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**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.**

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**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.

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### 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 arises:** - How can any country 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, 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 there such discrimination against 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 Hon'ble Health and Family Welfare Minister of India and the National Medical Commission to study understand to review the above two Gazette Notifications issued by the erstwhile Medical Council of India and find the answer to the following–

- 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 Regulations whereas most of these countries have 48 months of undergraduate medical course?
- 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

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

As we know every student returning from abroad can not be accommodated for Compulsory Rotating Medical Internship immediately after qualifying **NExT Step-1** because of the cap on 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 Hon'ble Health and Family Welfare Minister of India and 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 make it possible for the Foreign Medical Graduates to appear for the **NExT Step-1**, Compulsory Rotating Medical Internship and **NExT Step-2** examinations.

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 explanations 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.

- 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 explanations published.
- 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 issuing these kinds of 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 future of 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**

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

Mobile **+91 9999155591**

EMAIL [koulravikumar@gmail.com](mailto:koulravikumar@gmail.com)



**19.12.2023 to Mr. Anil Kumar Radadiya, MoHFW.pdf**  
556K



RAVI KUMAR KOUL &lt;koulravikumar@gmail.com&gt;

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

1 message

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**Ravi Kumar Koul** <koulravikumar@gmail.com>

Tue, Dec 19, 2023 at 8:57 PM

To: anil.radadiya@gov.in

Bcc: RAVI KUMAR KOUL &lt;koulravikumar@gmail.com&gt;

**SPEED POST & EMAIL**

To,

19.12.2023

**Mr. Anil Kumar Radadiya,**  
**Addl. P.S. to the Health & Family Welfare Minister,**  
The Government of India,  
Room No. 349; 'A' Wing,  
Nirman Bhavan,  
New Delhi-110011.

Through: - Speed Post & Email - [anil.radadiya@gov.in](mailto:anil.radadiya@gov.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 with the Secretary National Medical Commission 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 allowing me to meet you in your office on 11.12.2023.

This letter is in continuation of the points I raised in my previous 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.

I am hoping you will discuss concerns raised by me in this letter with all the concerned and resolve the inconsistencies and contradictions in various notifications from the National Medical Commission.

**I wholeheartedly welcome the Hon'ble Health and Family Welfare Minister of India and the National Medical Commission on 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 in **CHAPTERS - I to VI** 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 in an online video conference with the Secretary, the National Medical Commission agreed to my point that the Public Notices and the FAQ's cannot supersede any Gazette Notification.

Sir, the Secretary, National Medical Commission 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 FAQs issued on 22.11.2023, 07.12.2023 and 11.12.2023.

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**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.**

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**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)

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**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
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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.

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**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.

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**(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 arises:** - How can any country 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, 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 there such discrimination against 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 Hon'ble Health and Family Welfare Minister of India and the National Medical Commission to study understand to review the above two Gazette Notifications issued by the erstwhile Medical Council of India and find the answer to the following–

- 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 Regulations whereas most of these countries have 48 months of undergraduate medical course?
- 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

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

As we know every student returning from abroad can not be accommodated for Compulsory Rotating Medical Internship immediately after qualifying **NExT Step-1** because of the cap on 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 Hon'ble Health and Family Welfare Minister of India and 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 make it possible for the Foreign Medical Graduates to appear for the **NExT Step-1**, Compulsory Rotating Medical Internship and **NExT Step-2** examinations.

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 explanations 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.

- 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 explanations published.
- 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 issuing these kinds of 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 future of 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**

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

Mobile **+91 9999155591**

EMAIL [koulravikumar@gmail.com](mailto:koulravikumar@gmail.com)



**19.12.2023 to Mr. Anil Kumar Radadiya, MoHFW.pdf**  
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RAVI KUMAR KOUL &lt;koulravikumar@gmail.com&gt;

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**Rajya Sabha Unstarred Question No. 289 Answered on the 05th December, 2023 (copy attached) and NMC (UGMEB) Public Notice No. U/-15024/9/2023-UGMEB dated the 22nd Nov. 2023.**

1 message

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**Ravi Kumar Koul** <koulravikumar@gmail.com>

Wed, Dec 6, 2023 at 3:30 PM

To: anil.radadiya@gov.in

Bcc: RAVI KUMAR KOUL &lt;koulravikumar@gmail.com&gt;

**MOST URGENT PLEASE**

To,

06.12.2023

**Mr. Anil Kumar Radadiya,****Addl. P.S. to****The Health & Family Welfare Minister,**

The Government of India

Room No. 349; 'A' Wing,

Nirman Bhavan, New Delhi-110011, INDIA

**Email - [anil.radadiya@gov.in](mailto:anil.radadiya@gov.in)****Subject & Reference** – Rajya Sabha Unstarred Question No. 289 Answered on the 05th December, 2023 (**copy attached**) and NMC (UGMEB) 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 30.11.2023.

Government of India, Ministry of Health and Family Welfare, Department Of Health and Family Welfare, Rajya Sabha, Unstarred Question No. 289 answered on the 05th December, 2023 assistance for education to medical students returned from Ukraine answered by the Hon'ble Minister of State in the Ministry of Health and Family Welfare (Dr. Bharati Pravin Pawar) reads –

**(iii)** The NMC has conveyed No-objection to the Academic Mobility Program offered by Ukraine i.e. temporary relocation (for the period of conflict) to other universities. **Under this relaxation, the FMGs returning from Ukraine are allowed to avail one time opportunity to complete their remaining medical course.** The Degree may however be awarded by the University where they shall migrate. Vide Notice dated 22.11.2023, the NMC has extended the relaxation to such students for the period of 3 months.

This statement in Rajya Sabha in the highest institution of the country seems to have confirmed that the FMG's (ALL) returning from Ukraine are allowed to avail one time opportunity to complete their remaining medical course.

**Kindly confirm if all Ukraine returned students are now allowed to take transfer 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](mailto:koulravikumar@gmail.com)



**05.12.2023 RAJYA SABHA.pdf**

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To,

26.06.2023

**Mr. Anil Kumar Radadiya,**  
**Addl. P.S. to**  
**The Health & Family Welfare Minister,**  
The Government of India  
Room No. 349; 'A' Wing,  
Nirman Bhavan,  
New Delhi-110011, INDIA

**Subject –** My meeting with the National Medical Commission on 18.05.2023

**Regarding –** Support 1st/ 2nd Year Ukraine Returned Indian Students.

Dear **Respected Sir,**

This is to inform you that last month I had requested Dr. Aruna V. Vanikar, President, Undergraduate Medical Education Board; National Medical Commission for an appointment and she gave me opportunity to speak to her on 18.05.2023. I thank her from the core of my heart for giving me opportunity to speak. It was a nice meeting.

Respected Sir, I want to bring to your kind notice that the students who joined medical education in Ukraine in the Session 2021-22 following all rules and regulations prevailing at that time; have been studying online for 2 years and parents have spent lot of money for the same.

As per the law of our country online classes are not valid and **also they will not be perfect doctors unless they join offline classes in 3rd year.**

1. They have completed 2 years of education that may not require clinical classes BUT from 3rd year they need clinical education that can not be possible online.
2. Many of them are ready to fly to Ukraine but they are not able to get a transit visa.
3. Even if the students reach Ukraine, they will have to live in war zone for next 4 years, a long time to survive while living in life threatening conditions there and their parents will not be able to live with peace of mind in India.
4. Also even if they study in a mobility programme in some other country as permitted by the National Medical Commission, he or she will not be able to gain perfect practical knowledge under Mobility Programme.
5. Further law of Ukraine on Mobility programme <https://zakon.rada.gov.ua/laws/show/579-2015-%D0%BF> says it can not be run for more than 2 years & these students still have 4 years to go.

Recently the Ministry of Health and Family Welfare and the National Medical Commission used special provisions to allow Indian students to appear for 5th Attempt - Mercy attempt (vide circular no.: C.20011/122/2023-NMC/Coord dated 12th May 2023 – copy attached) despite the same request being rejected by the Hon'ble Court.



**Similarly kindly use provisions for Ukraine returned Indian students those come under FMGL2021 and allow them one time transfer;** like it was done in 2014 during Russia - Ukraine war & also mentioned in the Notification from Erstwhile Medical Council of India Gazette Notification dated 15.01.2016 No. MCI/203(9)/2011-Regn/160951 (copy enclosed).

**Life in Ukraine is not normal, War is on. Situation in Ukraine is life threatening**

I kindly request your good self (the Hon'ble Ministry of Health and Family Welfare) **to intervene on humanitarian grounds** by advising the National Medical Commission **for grant of special one-time permission to allow transfer of the students those joined medical education in year 2021** and come under Foreign Medical Graduate Licentiate Regulations 2021 dated 18.11.2021.

Look forward to your kind support as **they are innocent and want to be perfect doctors.**

Kindly allow them one time transfer using special provisions and powers.

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](mailto:koulravikumar@gmail.com)



RAVI KUMAR KOUL &lt;koulravikumar@gmail.com&gt;

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**Telephonic call from your office on 22.06.2023**

2 messages

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**Ravi Kumar Koul** <koulravikumar@gmail.com>

Mon, Jun 26, 2023 at 12:44 PM

To: anil.radadiya@gov.in

Bcc: RAVI KUMAR KOUL &lt;koulravikumar@gmail.com&gt;

To,

26.06.2023

**Mr. Anil Kumar Radadiya,**  
**Addl. P.S. to The Health & Family Welfare Minister,**  
The Government of India  
Room No. 349; 'A' Wing,  
Nirman Bhavan,  
New Delhi-110011, INDIA

**Email to –** [anil.radadiya@gov.in](mailto:anil.radadiya@gov.in)**Subject –** Telephonic call from your office on 22.06.2023.Dear **Respected Sir,**

This has reference to my letter for appointment with the Hon'ble Health & Family Welfare Minister; I received a telephone call from your office on 22.06.2023 for a meeting scheduled for 26th or 27th June 2023 with you Sir.

I was directed to call the same number on either on 26th or 27th June 2023 to confirm the date and time.

Today 26th June, I called the number +91 11 23063513 for the same. Though I talked twice but could not get a confirmed response from the officer who picked up the call.

**Respected Sir, could you please advise me what date and time I can visit your office for the proposed meeting.**

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](mailto:koulravikumar@gmail.com)

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 **to Mr. Anil Kumar Radadiya.pdf**  
249K

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**Ravi Kumar Koul** <koulravikumar@gmail.com>

Mon, Jul 3, 2023 at 12:30 PM

To: anil.radadiya@gov.in

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

To,

**03.07.2023**

**Mr. Anil Kumar Radadiya,**  
**Addl. P.S. to the Health & Family Welfare Minister,**  
The Government of India  
Room No. 349; 'A' Wing,  
Nirman Bhavan,  
New Delhi-110011, INDIA

**Subject – Scheduled meeting.**

**Reference: Telephonic call from your office on 22.06.2023.**

Dear **Respected Sir,**

This is to remind you of my email 26.06.2023 that was sent to you as I had received a call from your office on 22.06.2023 for a meeting scheduled for 26th or 27th June 2023 with you, in reference to my letter for appointment to the Hon'ble Health & Family Welfare Minister.

I was directed to call the same number on 26th or 27th June 2023 to confirm the date and time.

As advised I called the number +91 11 23063513 for the same on 26th as well as 27th June 2023 multiple times to confirm the date and time.

Though I talked on the number several times but could not get a confirmed response from the officer who picked up the call, every time he told me to call after sometime.

**Respected Sir, could you please advise me what date and time I can visit your office for the proposed meeting.**

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](mailto:koulravikumar@gmail.com)

[Quoted text hidden]



**to Mr. Anil Kumar Radadiya.pdf**

249K



RAVI KUMAR KOUL &lt;koulravikumar@gmail.com&gt;

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**Appointment for a Meeting**

1 message

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**Ravi Kumar Koul** <koulravikumar@gmail.com>

Mon, Jan 15, 2024 at 2:02 PM

To: anil.radadiya@gov.in

Bcc: RAVI KUMAR KOUL &lt;koulravikumar@gmail.com&gt;

To

15.01.2024

**Mr. Anil Kumar Radadiya,**  
**Addl. P.S. to the Health & Family Welfare Minister,**  
The Government of India,  
Room No. 349; 'A' Wing,  
Nirman Bhavan,  
New Delhi-110011.

**Through:** - by hand and Email to: [anil.radadiya@gov.in](mailto:anil.radadiya@gov.in)

**Sub:** - Appointment for a Meeting.

Respected Sir,

This is in continuation to my letter sent to you through email dated 19.12.2023 followed by a hard copy delivered personally for your perusal at the office of Union Minister of Health & Family Welfare, Nirman Bhavan by hand on 20.12.2023.

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**

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

Mobile & WhatsApp Number **+91 9999155591**

EMAIL [koulravikumar@gmail.com](mailto:koulravikumar@gmail.com)

Encl.:

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

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**2 attachments**



**Copy of Email dated 19.12.2023 to Mr. Anil Kumar Radadiya, Addl. P.S. to MOHFW.pdf**  
310K



**15.01.2024 to Mr. Anil Kumar Radadiya, Addl. P.S. to MOHFW.pdf**  
383K