
CPD GOVERNANCE AND COMPLIANCE POLICY

This Policy replaces:

- *Annual Audit of Participation in Continuing Professional Development Policy*
- *Compliance and Exemption from Continuing Professional Development Policy*
- *Participation in Continuing Professional Development Policy*

1. PURPOSE

Professional medical practice is founded on the goal of providing the best possible healthcare for patients and the community. Medicine is constantly evolving and to maintain their expertise, doctors must continue to develop professionally throughout their careers.

The Royal Australasian College of Medical Administrators (the College) strives to provide its members with the environment and resources that enable them to continue to develop as doctors. It considers that participation in a Continuing Professional Development (CPD) program is essential for medical administrators to sustain their skills and completion of the College CPD Program is an annual mandatory requirement for Fellows and Associate Fellows to maintain their membership of the College (College Constitution, Sections 7.1 and 9.4-9.9).

The College is accredited by the Australian Medical Council as a provider of CPD for specialist medical administrators in Australia and Aotearoa-New Zealand and the structure of the College program aligns with the standards for CPD specified by the Medical Board of Australia (MBA) and the Medical Council of New Zealand (MCNZ). By completing the College program, Fellows meet the requirements of these regulatory bodies for registration and recertification as specialist medical administrators.

2. OBJECTIVES

This policy describes the governance of the College CPD program, the requirements for compliance, the CPD audit process and the out-come for members who are non-compliant.

Further information, a detailed description of the program and other resources can be found on the College website and in the CPD Handbook.

3. INTENDED AUDIENCE

This Policy applies to all RACMA Fellows and Associate Fellows.

4. KEYWORDS

Continuing Professional Development Program, Participation, Compliance, Audit

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5. GOVERNANCE

The Continuing Education Program Committee (CEPC) is a sub-committee of the Education and Training Committee which is a Standing Committee of and reports to the College Board.

The CEPC is responsible for the policy and procedures that guide the development, implementation and the evaluation of the College CPD program. The CEPC supervises audits of college members to monitor compliance with the CPD program and advises on assistance and remediation for members who are non-compliant. The CEPC Chair is appointed by the College Board and its membership, function, duties and responsibilities are described in its Terms of Reference.

College members may appeal against any decision of the CEPC through the processes outlined in the College Reconsideration, Review and Appeal Policy.

6. COMPLIANCE

6.1 AUSTRALIAN AND AOTEORA-NEW ZEALAND FELLOWS

All Fellows must achieve a minimum of 50 hours of approved CPD activity per year.

Activities must be within a framework of cultural safety, health equity and ethical and professional practice and be relevant to medical administration competencies.

6.2 CPD ACTIVITIES

CPD activity must include:

1. A mandatory Professional Development Plan
2. A mandatory annual structured conversation with a peer, colleague or employer.
3. A mixture of activities in the following 3 categories specified in the MBA and MCNZ CPD standards:
 - Category 1: Reviewing and Reflecting on Practice (NZ) / Reviewing Performance (AUS)
 - Category 2: Measuring and Improving Outcomes (NZ) / Measuring Outcomes (AUS)
 - Category 3: Educational Activities (AUS & NZ)

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This will include:

- a. A minimum of a combined 25 hours in CPD categories 1 and 2:
 - Reviewing performance (Australia) / reviewing and reflecting on practice (New Zealand)
 - Measuring outcomes (Australia) / measuring and improving outcomes (New Zealand)

Members will decide the best mix for activities in Categories 1 and 2, to best suit their development needs, with a minimum of 5 hours in each category

- b. A minimum of 12.5 hours in CPD Category 3: Educational activities.
- c. For the remaining 12.5 hours and any hours in addition to the minimums presented above, Members choose across the three types of CPD to best suit their development needs.

6.3 HONG KONG FELLOWS

College Fellows registered and practicing in Hong Kong undertake CPD certification with the Hong Kong College of Community Medicine (HKCCM). Fellows are awarded a RACMA certificate of CPD compliance on completion of the HKCCM program.

As Hong Kong Fellows are not registered or recertified by the MBA or MCNZ, the regulatory requirements for registration are not applicable.

6.4 ASSOCIATE FELLOWS

Associate Fellows must achieve a minimum of 20 hours of approved CPD activity per annum including the submission of a professional development plan which has a maximum credit of 5 hours. There are no mandated minimal hours for the categories of CPD activities.

Associate Fellows with general but not specialist registration, whose practice is predominantly in medical administration, may choose the College as their CPD “home” or provider but are required to complete the same CPD requirements as Fellows.

6.5 RETIRED MEMBERS

Retired Members, who do not have active medical registration, may choose to undertake CPD activities but the compliance requirements do not apply, and no specific activities or minimum hours are mandated.

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7. CPD UNDERTAKEN THROUGH OTHER COLLEGES

Fellows and Associate Fellows are required to complete the College's CPD program and the completion of another specialist medical college's CPD Program does not exempt members from participation in the College program.

However, CPD activities undertaken with another college's program may also be credited by the College program if they relate to leadership, management or other College competencies or the scope of practice of medical administrators. Activities which do not relate to these competencies cannot be counted as College CPD activity.

8. EXEMPTION FROM COMPLIANCE

Fellows and Associate Fellows who have, or who anticipate that they will have, difficulty meeting College CPD requirements may apply for an exemption from compliance for a maximum of one year. Applications are to be submitted in writing to the Director of Members' Services and Engagement at the College (cpd@racma.edu.au) or by completion of the online application form 'Apply for Exemption' which is available on the RACMA website.

An exemption from participation in the CPD program may be granted to a College member who meets one or more of the following criteria:

- Bereavement following the death of an immediate family member
- Extended family/personal leave
- Parental leave
- Health reasons
- Extended absence from professional duties
- Other special circumstances

An application for exemption will be considered and determined by the CEPC. Exemptions are considered on a case-by-case basis and may be approved for a maximum period of one year. The CEPC may approve a pro-rata exemption and set a reduced minimum requirement for an applicant whose criterion for exemption resolves or is less than one year.

An applicant may lodge an appeal against the decision of the CEPC through the processes outlined in the College Reconsideration, Review and Appeal policy.

9. RECORDING ACTIVITIES IN MYRACMA

All CPD activities are to be recorded on the MyRACMA app and members have the responsibility to maintain their MyRACMA record. Each recorded activity must be supported by either an outline of the activity and a reflective learning statement or supporting documentary evidence.

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Data stored within MyRACMA may be used by the College to generate operational reports and to undertake program analysis. The College may produce ad hoc summary and detailed reports to inform the Board, Board sub-committees (and their working parties) and delegated College Officers on CPD participation and compliance. Participation and compliance reports are routinely generated and made available to the College Board and its sub-committees.

The Chair of the CEPC and the jurisdictional CPD Co-ordinators in Australia, Hong Kong and New Zealand have access to the MyRACMA records of the members in their jurisdiction to provide advice and guidance to members and address certification and compliance issues.

The creation and use of these reports comply with the college privacy policy.

10. CERTIFICATION

College Members who complete the CPD program are issued with a Certificate of Compliance with CPD each year. Non-compliant Members will be identified through the audit process and will not be eligible for a Certificate of Compliance.

11. NON-COMPLIANCE

Non-compliance of CPD requirements is a breach of the College Constitution. Any members who are deemed as non-compliant will be provided with the opportunity to remedy the situation. If a member does not respond to offers of remediation, the Board may determine to remove membership (RACMA Constitution Clauses 9.4 – 9.11). The MCNZ and the MBA will be notified of Fellows who are non-compliant.

12. AUDITS

The College Constitution, (2019) (Section 9) authorises the undertaking of occasional audits to determine Member's compliance with the mandatory CPD program. In addition, the college is required by the Australian Medical Council to undertake regular audits of the CPD participation of Fellows.

The College, through the CEPC, annually undertakes two internal audits. External audits of individual Fellows may also be undertaken by the MBA or MCNZ.

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13. ANNUAL CERTIFICATION AUDIT

The closing date for Members to log CPD activities for the preceding calendar year is 31 March of the following year. After this date, the jurisdictional CPD Coordinator reviews each Member's record of logged activities and electronically signs off the records of Members who have met the program requirements. Fellows and Associate Fellows who have not met the deadline are encouraged by the coordinators to log their activities and achieve compliance. The coordinators provide support and guidance where necessary.

The Chair of the CEPC gives the final approval before annual certificates are made available to members.

Participants who have not logged sufficient activities to meet the CPD requirement and who have not achieved a CPD compliance certificate are contacted by the College Director of Membership Services and Engagement, in August of each year, to be advised that the College Board and regulatory authorities will be notified of their non-compliance.

14. ANNUAL COMPLIANCE AUDIT

An audit of at least 10% of Members' CPD records, including a review of their evidence of participation, is undertaken by the Chair of the CEPC each year.

The Chair discusses with Members any discrepancies found in their records, and remediation, through support and counselling, is offered. If remediation is not possible, the College Board is notified of the member's non-compliance, and it may withdraw their membership. Appeals against the Board's decision are managed through the College's Reconsideration, Review and Appeal Policy.

15. REGULATORY AUTHORITY AUDITS

In addition to audits undertaken by the college, The Australian Health Practitioner Regulation Authority, on behalf of the MBA may audit Member's CPD at any time. This is also undertaken by the MCNZ. All Members are responsible for keeping evidence of their CPD activities for a period of three years in case of audit.

16. ASSOCIATED DOCUMENTS

RACMA Constitution – 2019

RACMA CPD Handbook 2022

Medical Council of New Zealand – Recertification and Continuing Professional Development

Medical Board of Australia – Registration Standard: Continuing Professional Development

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