

To,

11.07.2023

Shri Narendra Modi Ji,
Honb'le Prime Minister of India,
152, South Block,
Raisina Hill,
New Delhi-110011

Reference - All my letters sent to You Sir as well as copy sent directly to the National Medical Commission & the Ministry of Health and Family Welfare.

Reason for sending my letters addressed through this office of Honb'le Prime Minister -

Never ever got even single line reply to my letters sent directly to the National Medical Commission & the Ministry of Health and Family Welfare.

Reference No's - PMO/PG/D/2023/005519 dated 11.03.2023; PMO/PG/D/2023/006468 dated 17.03.2023; PMO/PG/D/2023/006609 dated 25.03.2023; PMO/PG/D/2023/008068 dated 15.04.2023; PMO/PG/D/2023/008334 dated 27.04.2023; PMO/PG/D/2023/012399 dated 12.06.2023; PMO/PG/D/2023/012119 dated 12.06.2023; PMO/PG/D/2023/012733 dated 16.06.2023; PMO/PG/D/2023/013338 dated 24.06.2023; PMO/PG/D/2022/015478 dated 08.07.2022; DHLTH/C/A/23/000007 dated 01.06.2023; DHLTH/C/A/23/000044 dated 29.05.2023; DHLTH/E/2023/000707 dated 14.06.2023; DHLTH/E/A/23/000078 dated 16.06.2023. Since the direct letters were never ever replied by the NMC and the above grievances not replied to satisfaction at all; these registration numbers still remain as pending grievances.

Regarding - Gazette notifications - Foreign Medical Graduate Licentiate Regulations, 2021 dated 18th November, 2021 and the "NMC, National Exit Test Regulations, 2023 dated 27th June, 2023.

Subject - Future of thousands of Indian Medical Aspirants at risk due to Vague Advisories from the National Medical Commission; none from the Ministry of Health and Family Welfare, absence of Proper Advisory will cause devastating problems for both parents and the students.

Dear **Respected Sir,**

I want to remind your good self as informed earlier also that I am a Senior Citizen, aged +63 years, was closely following the family business of Medical Education Abroad Consultancy to keep my self busy in my life and Guide & Advice the students those were not able to make it to dream medical education in a Medical College in India.

I stopped sending students abroad immediately after the promulgation of “NMC (National Medical Commission) Gazette Notification - Foreign Medical Graduate Licentiate Regulations 2021” (**FMGL - 2021**); and continued to educate the aspiring medical students against going for Medical Education Abroad; as could find that most of the countries are not following **FMGL – 2021** as I see it.

Respected Sir, Honestly the “**NMC (National Medical Commission); Foreign Medical Graduate Licentiate Regulations 2021**” will surely upgrade the quality of Medical Education & Health System in India; but needs attention towards critical points as described below.

The students, parents and many among us have been continuously writing to the National Medical Commission about acceptance and validity of the education from various countries but The National Medical Commission is never answering the questions in objectivity rather citing Foreign Medical Graduate Licentiate Regulations 2021” (**FMGL - 2021**) **rules** back repeatedly that has created serious confusion among the students.

Here through you, I want the National Medical Commission & the Ministry of Health and Family Welfare to address the critical concerns for the welfare of the aspiring medical students and the country.

Despite various Gazette notifications namely - the NMC, Foreign Medical Graduate Licentiate Regulations, 2021 dated 18th November, 2021 and the NMC, National Exit Test Regulations, 2023 dated 27th June, 2023 innocent Indian aspiring Medical Students continue going abroad in very large numbers to various countries and need of the hour is to guide Indian aspiring Medical Students on to the right path **not to leave them on the mercy of education consultants and foreign institutions.**

The National Medical Commission need tell all the actual interpretation of various sections of the NMC - Foreign Medical Graduate Licentiate Regulations, 2021 dated 18th November, 2021 and the National Exit Test Regulations, 2023 dated 27th June, 2023 described as **CRITICAL CONCERNS** below -

CRITICAL CONCERN NO. 01

This has reference to “**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 –
(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;

The National Medical Commission must give interpretation in simple language of the Section 4(b) of the Gazette Notification. We all need to educate the aspiring

students going abroad for medical education as to what does this Section 4(b) of Gazette Notification actually mean.

Every education consultant is giving the interpretation of his own that suits his or her business, but finally the students will suffer after completion of degrees.

- a. Many of the Education consultants explain to the aspiring students that **the Registration as Medical Practitioner is required** after completion of degree; from the licensing authority of the same country awarding the degree before coming back to India.
- b. Many of the Education consultants explain to the aspiring students that **the Registration as Medical Practitioner is NOT required** from the licensing authority of the same country awarding the degree before coming back to India after completion of degree; but **the degree and the degree holder must be eligible to get registration** in a country abroad awarding the degree.

Here I want to know through you does clause 4(b) means that a student needs –

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

CRITICAL CONCERN NO. 02

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

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

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

ABOUT INTERNSHIP ABROAD – confusion has been created by many 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 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 for explanation on internship BUT with the remarks – “**these are only the nature of explanation without legal validity**”; and these words (**without legal validity**) is being misused by many to misguide the aspiring students.

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

CRITICAL CONCERN NO. 03

This has reference to “**The National Medical Commission Gazette Notification; dated the 18th November, 2021; No. UGMEB/NMC/Rules & Regulations/2021/**” that 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.

I want to know the official interpretation in a simple language about “**The total duration of the foreign medical graduation**” as mentioned in last line of “The National Medical Commission Gazette Notification no. UGMEB/NMC/Rules & Regulations/2021 dated 18th November, 2021.

Does **THE TOTAL DURATION OF THE FOREIGN MEDICAL GRADUATION COURSE** required to be completed within 10 years from the date of joining **mean** -

1. Under Graduate Degree Course abroad.

OR

2. Under Graduate Degree Course + Internship Abroad.

OR

3. Under Graduate Degree Course + Internship Abroad + Registration / License Abroad.

OR

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

OR

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

OR

6. Any thing else may kindly let me know the same please for the information and benefit of Indian students.

CRITICAL CONCERN NO. 04

The National Medical Commission Gazette Notification NMC, National Exit Test Regulations, 2023 dated the 27th June, 2023 F. No. CDN-19012/15/2022/Coord.-NMC. Reads –

Chapter 2
Broad outline and General Features of the NExT
2.1 NExT Step 1

viii. 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.

Respected Sir, how is that practically possible.

1. A student studies MBBS equivalent degree abroad in not less than 6 to 7 years.
2. He or she has to qualify NExT Step 1 in 8th year
3. He or she has to complete CRMI in India in 9th year and
4. He or she has to qualify NExT Step 2 in 10th year

Don't we feel that it is too harsh on **The Foreign Medical Graduates?**

An **Indian Medical Graduate** gets minimum of 4.5 years to complete NExT Step 1 and NExT Step 2 Examinations and a **Foreign Medical Graduate is not given a single day** after completion of his or her - final year examination abroad, internship abroad and licensing examination abroad.

Respected sir, this is what I had requested in my couple of previous letters to The National Medical Commission through you to kindly take care of this discrepancy between among Indian Medical Graduates and Foreign Medical Graduates while formulating the Gazette Notification NMC, National Exit Test Regulations.

This is clear injustice with the Foreign Medical Graduates.

CRITICAL CONCERN NO. 05

The National Medical Commission Website says – “The public at large is advised that before taking admission in MBBS or its equivalent course in a university outside India, confirmation of the fee structure, details of the course (which should be commensurate with the MBBS courses in India such as content, duration and internship) etc. should be directly obtained from the University/ Institution concerned”.

Respected Sir, Can we really believe University/ Institution concerned for such crucial information when we know that they want more & more students for more and more money? Also in many such universities abroad we have contractors holding important administrative posts in Universities. **Do you want the aspiring medical students to trust them?**

Here on this point I will like to say that previously to some extent **the Medical Council of India was better when compared with the National Medical Commission of today**; while thinking about information exchange with the students.

On every working day students used to visit the office of the Medical Council of India during a stipulated time, meet **the concerned officer** to get the correct authentic information about Indian as well as Foreign Medical Education.

- ❖ It was not an office staff or call center that would interact with the visitors but the department head or section officer himself or herself.
- ❖ There used to be at least a list of medical institutions abroad where students used to check the name of the university and the country in the list before seeking admission with the hope that since the particular institution is listed meant degree of that listed institution abroad is recognized for licensing in India.
- ❖ **What is the status today?** There is no list; no guidelines and the medical education consultants (AGENTS) use their marketing skills to grab the students for the destination of their choice to make more and more money.

Asking students to seek guidance from the University/ Institution concerned abroad is nothing but risking the career, Forex and the health system of our country.

The Ministry of Health & Family Welfare (taking care of everything in health sector in India); the National Medical Commission (making and governing the rules and regulations for medical education in India) and the Indian missions Abroad (having the responsibility of everything that concerns India and Indians on foreign soil) must take the responsibility to safeguard the whole thing.

Medical Education Abroad is not a small issue but **a serious issue that can hurt the health system of the nation in future** so look at it in the National Interest.

Something is required to be done on this to guide our aspiring students.

- ✓ These students join institutions abroad on the feedback & guidance given to them & their parents by Medical Education Consultants.
- ✓ These students join institutions abroad on the feedback & guidance received from the Medical Universities / institutions abroad.

Despite the removal of list from the NMC website aspiring medical students continue going abroad for medical education thereby spending huge parent's hard earned money by the grace of Medical Education Consultants.

Having list on the National Medical Commission (previously Medical Council of India) website limited number of students used to go abroad; **after the removal of the list from the website of the National Medical Commission the number of students seeking admissions abroad has multiplied many times.**

Right from the day the National Medical Commission announced the removal of list from the website **a large number of New Foreign Institutions (Government or Private, Medical or Non Medical)** have been **launched as medical institutions** for Indian students to earn more & more money and are being launched almost every day, every week.

What will happen? - Students will spend 5/6/7 or more years for their studies abroad before they will come back to India.

After returning to India the student will approach the relevant agencies for FMGE or NeXT examination & for license to the National Medical Commission, but he or she may face:-

❖ **Rejection of degrees as many countries may not be following the Foreign Medical Graduate Licentiate Regulations, 2021.**

Students are going to be the Losers (loosing the precious time of their career) and their parent's money (huge funds) and Forex of the country.

Respected Sir, as on date there is no authentic source of information available to Indian students that they could trust for the safety & security of their education and career. These students and their families are **solely dependent on the details given by the Indian Medical Education Consultants (AGENTS)** but they need authentic guidance from government sources especially the **National Medical Commission**.

Students need to be educated about such institutions, countries or degrees those do not follow the FMGL2021 **before seeking admissions and not after returning with such degrees**. Else it will cause their economically poor parents will loose their hard earned money and precious time of 5/ 6/ 7 or more years of their career.

Respected Sir,

By ignoring the situation today and not thinking of expected situation in future, our country is going to loose huge Forex for every batch of students.

Imagine this financial loss till 2027; as by 2027 we will be having 6 batches of medical students studying abroad. Means in 2027 we will be having not less than 90000 of medical students studying abroad.

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 first batch of Foreign Medical Graduates in 2027 on return to India calculating at 15000 students per year there will be a loss of **1,890,000,000 USD** of **FOREX** to the India between 2021 to 2027.

THIS IS GOING TO BE HUGE LOSS OF FOREIGN EXCHANGE TO OUR COUNTRY

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
Total Spent by 2021 batch till 2027	540000000	USD
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
Total Spent by 2022 batch till 2027	450000000	USD
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
Total Spent by 2023 batch till 2027	360000000	USD
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
Total Spent by 2024 batch till 2027	270000000	USD
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
Total Spent by 2025 batch till 2027	180000000	USD
Calculation of Students batch 2026 to 2027 (for 1 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
Total Spent by 2026 batch till 2027	90000000	USD
Total Loss of Foreign Exchange from 2021 up to 2027	1890000000	USD

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

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

- ❖ These students need proper guidance from some one to tell them what is good or bad for their future and there is nothing better than the Government of our own country through the Ministry of Health & Family Welfare; the National Medical Commission to trust with.
- ❖ **These aspirants can be better quality doctors if guided to a proper place and the proper institution.**
- ❖ Listing of selected Government Medical Institutions having fully English as Medium of instruction can be a better step to save students from being misled by the Education Consultants.

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 (Gazette Notifications) 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 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 instruct 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 as said by the Hon'ble Minister recently.**

YEAR 2027 - 1st batch of 15000 Foreign Medical Graduates under Foreign Medical Graduate Licentiate Regulations 2021 (with valid or invalid degrees) will return to India with their degrees; most of them may need to go for litigations as expected.

REASON - Today no one knows which country, which institution, which degree will be recognized for licensing in India.

The only way to save our country from such an impending disaster is to **release answer to all five concerns raised above** with proper guidance and guidelines for aspiring medical students about the medical education and the medical institutions abroad in various countries by the National Medical Commission.

Fresh admissions are on & students are going to fly in near future.

The Ministry of Health & Family Welfare and the National Medical Commission need to act fast to issue instructions to stop more innocent students from being misled and their career spoiled.

Sincerely Yours,

Ravi Kumar Koul

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