

PA: ADM1 - Assessing the acceptability of overseas PA qualifications

Introduction

1. This guidance is for authorised decision makers ('ADMs') asked to consider whether a qualification awarded by an institution¹ established outside of the UK is acceptable for the purposes of registration as a Physician Associate (PA).
2. This guidance aims to ensure consistency, fairness and proportionality in our approach to making decisions. ADMs should read it in conjunction with the ['Principles which apply to decision-making'](#) across all our registration and revalidation functions.
3. This guidance sits under our [Registration evidence framework](#), which sets out the overarching policy for PA/AA registration.

Basis for assessing overseas qualifications

4. An acceptable overseas qualification (AOQ) is an international qualification which has been accepted by us to be a relevant qualification.
5. A relevant qualification is defined in the General Medical Council (Registration) (Anaesthesia Associates and Physician Associates) Rules ('the registration rules') as, 'an approved qualification or a qualification which is accepted by the Regulator for the purposes of registration as an associate'. Individuals are only eligible to apply for registration where they hold a relevant qualification².
6. We assess whether to accept an individual's international qualification for the purposes of registration as an associate under Article 4 (2)(c) of the Anaesthesia Associates and Physician Associates Order (AAPAO). Because only those holding a relevant qualification can apply for registration, the assessment of an international qualification has to be done before an application for registration can be made.
7. As outlined in the [Registration evidence framework](#) holding a relevant qualification, will be accepted as evidence that the applicant meets the standards of education and training, which are two of the nine standards required for registration as a PA.
8. Our [policy on assessing overseas qualifications for PAs](#) explains how we will assess an

¹ By 'institution' in this guidance we mean awarding bodies, universities, and places of study.

² Under rule 4(1) of the registration rules

individual's overseas qualification.

9. Where discretion is exercised to accept evidence to demonstrate one of more parts of the standards or information requirements for registration, ADMs must be satisfied of this in the context of the totality of the applicant's overall evidence.

Meeting the criteria for acceptable overseas PA qualifications

10. The ADMs assessment is of the specific programme of study undertaken by the individual, which led to the award of their PA qualification. As such, the ADM assessment is limited to the individual's specific qualification and is not a decision on the qualification conferred by an overseas institution in all cases.
11. We have developed the PA AOQ criteria to provide clarity around what makes an overseas qualification acceptable. The criteria broadly reflect the core components of a UK PA qualification, and all overseas qualifications must satisfy all of the criteria in order to be acceptable. This provides assurance that those with a relevant qualification have undertaken comparable education and training to a new UK qualified PA.
12. ADMs should bear in mind at all times that we require individuals and institutions to satisfy us of the criteria on the basis of robust, objective, independent and verifiable evidence.
13. We use the terms 'must' and 'should' in the criteria.
 - Where 'must' is used, the qualification has to fulfil the requirement.
 - 'Should' indicates that ADMs can use discretion. This is primarily used in relation to the amount of time considered sufficient to demonstrate that the criterion is met.
14. The criteria provide a clear indication of what is likely to satisfy ADMs that the qualification may be acceptable. However, ADMs are not fettered by the detail indicated within the criteria and have discretion to depart from this where they have a justified reason for doing so.
15. The individual's qualification must satisfy all of our approved criteria in place at the time of the assessment in order to be acceptable to us. It is at our discretion to determine which overseas qualifications are acceptable for the purposes of registration as a PA in the UK. Just because a qualification may have met our criteria in the past, does not mean that it remains acceptable to us now.
16. A decision that an overseas qualification is acceptable does not necessarily mean the individual will be granted registration. To be granted registration, applicants must satisfy us that they meet all nine of the registration standards, and the information and procedural requirements, as outlined in the registration evidence framework.
17. Where ADMs do not consider that a PA qualification satisfies all the criteria, it cannot be accepted as a relevant qualification. The AAPAO does not provide a right of appeal where it is determined that overseas qualifications are not acceptable.

Factors to consider

18. ADMs should use the checklist below to help them decide whether an applicant has provided satisfactory evidence that the qualification they hold is a relevant qualification and acceptable for the purposes of registration as a PA. ADMs will need to consider whether:
- the qualification satisfies all of the criteria
 - the evidence submitted is robust, objective, independent and verifiable.
19. All decisions must be made on a case-by-case basis and take into account the applicant's individual circumstances.

Checklist

20. When considering whether the individual's qualification is acceptable ADMs must consider in all cases whether each criterion is satisfied. ADMs should consider the guidance below to help them assess each criterion.

PA AOQ criteria

Criterion 1: Your qualification must permit you to practise as a Physician Associate, Physician Assistant, or other comparable title, in the country where the qualification was awarded.

- What profession was the individual's programme of study preparing the individual for post-qualification practise in?
 - Examples of what we do not consider to be a qualification which permits practise as a Physician Associate, or other comparable title, include: a medical degree, and an undergraduate nursing qualification.
- Is this role comparable to the role of a PA in the UK?
 - ADMs may find that the meeting of other criteria provide assurance of this. For example whether the in-person clinical experience covered all required areas.
 - ADMs may wish to seek clinical input to help satisfy them that this criterion is met.

Criterion 2: Your qualification must have been awarded in a country where the profession is regulated by law and must have been accepted for registration as a PA (or other comparable title) in that country,

OR

your qualification must have been accepted to hold registration as a PA in another country where the profession is regulated by law.³

³ This criterion is disapplied for PA qualifications from the Republic of Ireland, to account for the unique political factors and long-standing agreements that exist between the United Kingdom and Ireland, including the Common Travel Agreement and the Belfast Agreement (the Good Friday Agreement). This criterion is also disapplied for

ADMs must be satisfied that either:

1. the profession the individual's qualification permits entry to is regulated by law in the country in which it was issued

OR,

2. the individual's qualification has been accepted to hold registration as a PA (or other comparable title) in another country where the profession is regulated by law

OR,

3. the individual's qualification is from the Republic of Ireland, Switzerland or an EFTA country (in which case they are exempt from this criterion).

In the case of 1 or 2, ADMs should be satisfied that:

- the individual holds, or has held registration, in the relevant country (this may mean that the individual has had to fulfil additional requirements for gaining registration, such as a registration assessment)
- regulation is statutory, and not voluntary
- registration was granted on the basis of the qualification being assessed, and
- where the individual is no longer registered in the country, the qualification remains acceptable for registration in that country.

Criterion 3: Your qualification must have been awarded from an institution which is accredited by a recognised organisation in the country where it was awarded.

Is the ADM satisfied that the individual's qualification was awarded from an institution which has been accredited by a recognised institution, and which remains accredited? This might be:

- a regulatory body,
- Ministry of Health or Education,
- or other appropriate government body.

Criterion 4: Your qualification, and education and training must be based in scientific, evidence-based medicine and must include knowledge of biomedical science.

Is the ADM satisfied that the qualification, and the education and training which led to it, were based in scientific, evidence-based medicine? ADMs may wish to consider:

- whether there are any modules in non- scientific subjects, for example: social history, physical education, or languages.
- examples of what we do not consider to be modules in evidence-based medicine include: physiology of the chakras, herbology, traditional Chinese medicine (TCM) diagnostics and 'elemental medicine'.

applicants with qualifications obtained from EFTA countries and Switzerland due to the specific legislative requirements that apply.

- the modules and subjects which commonly form part of approved UK PA qualifications.
- whether, regardless of any modules that are not in scientific, evidence-based medicine subjects, the individual's programme of study includes approximately 3150 hours of education and training in scientific, evidence-based medicine over a minimum of two academic years (see criteria 5 and 6)?

When considering whether the education and training leading to the qualification includes knowledge of biomedical science, ADMs may wish to consider:

- the modules and subjects which commonly form part of approved UK PA qualifications, and whether the individual's programme of study included comparable time on these modules/subjects.
- the entry requirements for the course, and the extent to which individuals are required to have a background knowledge of biomedical science (such as previous qualifications in a life, biomedical or health science subject, or previous healthcare experience)?

Criterion 5: Your programme of study that led to your qualification should have taken a minimum of two academic years to complete.

Is the ADM satisfied that the individual's programme of study that led to their qualification took a minimum of two academic years to complete?

Where a qualification was issued after less than two complete academic years, is the ADM satisfied that the individual's education and training still covered the range of modules, subjects, areas of practice and practical procedures which commonly form part of approved UK PA qualifications?

Criterion 6: Your programme of study should have contained approximately 3150 hours of time in education and training.

When considering the number of hours of education and training, ADMs should note:

- Time in education and training includes:
 - the hours of the clinical placement
 - lectures
 - guided independent study (such as online learning and course reading prescribed by the course).
- Hours of time in education should not include self-directed study.
 - Self-directed study includes revision (wherever it is undertaken), studying for exams or any study or learning where the scope is defined by the student rather than a tutor. Self-directed study is not included in calculations of clock hours as there is no robust way in which the learning or the number of hours undertaken can be objectively substantiated.

Criterion 7: If you have studied at more than one institution, and the study contributed to the award of your PA qualification, it must be clear that:

- **the institution is part of a recognised twinning programme or a recognised campus of another institution, or**
- **it was not possible to complete your qualification at one institution for justifiable reasons, and**
- **the course credits that contributed to the award of your qualification must not have included credits transferred from another institution where you failed or were excluded (or where you left to avoid exclusion).**

In determining whether the institution is part of a recognised twinning programme, or a recognised campus of another institution, ADMs may wish to consider whether:

- they are satisfied that there is a clear formalised agreement between the different institutions, which we have confirmed with all institutions involved?
- there is any evidence supporting the arrangement from the regulatory body or government of the country (or countries) concerned?
- there is clarity about how the programme is delivered across the different institutions (for example what aspects of the curriculum, and how many clock hours, are studied at each institution)?
- there is clarity on who is responsible for oversight of the quality of teaching and supervision, and for ensuring that this is consistent across all sites at which the qualification is delivered?
- in cases where the awarding body country differs from that in which some or all of the qualification is delivered, the qualification is accepted in the awarding body country? If not, does this cause the ADM any concern?
- where a twinning arrangement is in place, the teaching in each institution builds on that delivered at the previous institution to ensure that the full curriculum is delivered?

In all cases, ADMs must be satisfied that no course credits which contributed to the award of the qualification came from another institution where the student failed or was excluded (or where they left to avoid exclusion).

When considering whether the reason for a student being unable to complete their qualification at one institution is justifiable, ADMs may wish to consider whether the reason:

- was due to circumstances beyond the individual's control?
 - For example: conflict or political unrest; the impact of events such as a pandemic or extreme environmental conditions; disability – where the reason preventing the individual from completing their qualification at one institution arises from their disability; bullying or whistle blowing; closure of the institution attended.
- concerned the individual's personal circumstances (eg relocation of family or job, marriage), and if so, whether the individual is able to satisfy the ADM that their performance and conduct was not in question at the previous institution(s)?

- concerned their exclusion, for example on the grounds of misconduct or poor performance, or an attempt to avoid expulsion on the grounds of performance or conduct, regardless of whether any other justifiable reason may also be present?
 - In considering whether ADMs are satisfied that the reason for attendance at multiple institutions did not concern issues with the individual's performance or conduct, ADMs may also wish to consider the number of institutions that the individual attended, and the length of time spent at each institution.

In all cases, ADMs must be satisfied that no course credits which contributed to the award of the qualification came from another institution where the student failed or was excluded.

Criterion 8: Your programme of study must have involved in-person clinical experience which was overseen and approved by the institution you attended. As a minimum this should have comprised of:

- **1,400 hours OR**
- **40% of the total course hours.**

In-person clinical experience may include both clinical skills training, and time on clinical placement(s).

The % total course hours clinical experience comprised is a 'should', because this reflects the current average % of clinical experience for UK PA courses. When ADMs are considering whether to use discretion to accept a higher or lower proportion of in-person clinical experience, ADMs should consider:

- how the duration of clinical rotations compares to UK PA qualifications
- how the amount of the individual's clinical education compares to UK PA qualifications
- whether the clinical experience included sufficient in person interactions with patients and other healthcare colleagues
- whether, and how much virtual clinical experience formed part of the programme of study
- whether the in-person clinical experience covered the expected range of areas of practice (see criterion 9)

In considering whether the clinical rotations were overseen and approved by the institution a student attended, ADMs may wish to consider whether:

- the clinical rotations were arranged by the institution awarding the qualification?
 - If the institution awarding the qualification did not arrange the clinical rotation(s), is the ADM satisfied that the locations and specialties in which the clinical rotation(s) will take, or took, place were formally agreed with the institution?
- there are formal written agreements in place between the institution and all clinical placement providers, covering issues such as:

- roles and responsibilities for the placement
- defined learning objectives for the placement
- arrangements needed to ensure that students have appropriate learning opportunities to meet the learning outcomes, including sufficient in person clinical interactions with patients and other healthcare professionals
- resources, including access to facilities within the placement
- process for raising concerns about the way the placement is being run and how these problems will be addressed.
- there are arrangements in place to ensure the effectiveness of the placements, for example to monitor and evaluate the quality and quantity of teaching, supervision and feedback in the placement?

Criterion 9: The in-person clinical experience completed as part of your programme of study must have included experience in each of the following areas:

- **General practice**
- **Acute and emergency medicine**
- **General medical specialties**
- **Paediatrics**
- **Surgery**
- **Gynaecology**
- **Mental health.**

ADMs may wish to seek clinical input in order to be satisfied that criterion 9 is met.

21. If we have previously confirmed to the individual that their qualification under assessment is acceptable to us, then it is possible that the legal principle of legitimate expectation might apply. Consideration of the following principles may help ADMs determine whether this might apply in each case:

- whether there is evidence that we have previously given a clear, unequivocal and unqualified response in confirming that the individual's overseas qualification under assessment was acceptable
- whether the confirmation that the qualification was acceptable was in relation to the individual's specific programme of study
- whether there is sufficient public interest to outweigh the unfairness to the individual in refusing to honour the assurance given and recognise the qualification
- the context within which confirmation about the acceptability of the qualification was given at the time; was it clear at the time that information was being sought for this purpose, or is the evidence being taken out of context?

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