



RACP CPD Exemption and Variation Policy

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Applicability	Australia and Aotearoa New Zealand

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1. INTRODUCTION

The RACP recognises that there are extenuating circumstances where a medical practitioner may be unable to meet Continuing Professional Development (CPD) registration standards set by the [Medical Board of Australia](#) (MBA) or recertification programme requirements set by [Te Kaunihera Rata o Aotearoa/ Medical Council of New Zealand](#) (MCNZ). This policy sets out the requirements for exemptions and variation in the [RACP CPD Program](#).

2. PURPOSE

The purpose of this policy is to outline the circumstances under which an exemption or variation from participation in RACP's CPD Program may be approved by the College.

- **Exemption:** CPD Participants taking continuous leave of absence from practice (including locum work) for a **full** calendar year may be granted an **exemption** from all CPD requirements for that year.
- **Variation:** Effective from 2027 CPD year, CPD Participants taking continuous leave of absence from practice longer than six months, but less than 12 months may be granted a **partial exemption or variation** to their CPD requirements but will still need to meet some of their annual CPD requirements. For example, a partial exemption or variation may be granted from one or more CPD categories, program-level requirements and/ or pro-rata hours.

3. SCOPE

This policy applies to all medical practitioners enrolled in the RACP CPD Program (CPD Participants) including:

- Fellows of the RACP (FRACP)
- RACP Trainees
- Interrupted trainees who nominate the RACP as their CPD Home
- CPD users (non-members)
- Specialist International Medical Graduates / Overseas Trained Physicians.

Members of the RACP CPD team are responsible for assessing CPD exemption and variation requests and determining their outcome.

4. EXEMPTIONS AND VARIATIONS FROM CPD REQUIREMENTS

4.1. Automatic exemptions

Exemptions from CPD requirements are automatically granted to the following CPD Participants:

- **RACP Trainees** undertaking an approved RACP training program leading to Fellowship of a Division, Faculty or Chapter of the College. Active participation in the training program satisfies the CPD requirements for the relevant CPD year.
- **New RACP Fellows** admitted from 1 July of the relevant CPD year. CPD requirements are deemed to have been met for the first six months of the CPD cycle.
- **RACP Fellows with non-practicing registration**, including those who retire from active practice during the CPD year.

4.2. Exceptional circumstances

An exemption or variation may be granted where exceptional circumstances result in a continuous absence from practice of at least six months and up to and including twelve months within a CPD year.

Eligible circumstances are:

- Parental leave
- Carer's leave
- Personal leave due to serious illness or injury
- Bereavement of immediate family or household member that results in substantial absence from practice and prevents undertaking of CPD
- Leave to attend cultural responsibilities

Circumstances that do not qualify for an exemption or variation from CPD requirements include:

- Workload, demands of employment
- Leave of absence/travel/ study
- Minor illness or injury
- Lack of knowledge of CPD Standard/recertification requirements
- Fellows residing overseas who maintain registration in Australia and/or Aotearoa New Zealand

The RACP may grant exemption/variation to CPD requirements in limited and specific circumstances other than those listed above. Requests will be considered on a case by case basis, upon individual application.

4.3. Maximum exemption duration

For medical practitioners registered in Australia, the MBA permits a **maximum** of three years of consecutive exemptions and/or variations for practitioners who meet the exemption/variation requirements.

There are no additional CPD requirements for CPD Participants who have been away from practice for a period of up to and including 12 months have no additional CPD requirements to return to practice. There may be additional regulatory requirements if a CPD participant is returning to practice after an absence of 12 months or more.

CPD Participants absent from practice between 12 months and up to and including 36 months must be familiar with [MBA recency of practice standards](#) and [MCNZ Policy on Practising certificate applications for doctors who have not lawfully practiced medicine within the previous 3 years](#). Absences of 3 years or more may be subject to re-entry to practice requirements determined by the MBA and the MCNZ.

5. APPLICATION REQUIREMENTS

All applications for exemption or variation from CPD requirements for a CPD year will be assessed on an individual basis.

Exemptions and variations will only be approved for one CPD cycle. Applications for an exemption or variation that spans across two CPD year cycles will be managed on a case-by-case basis.

CPD Participants seeking to extend a period of exemption or variation must submit a new application for each CPD year.

The RACP recommends that CPD Participants seek advice from the MBA/ Australian Health Practitioner Regulation Authority (Ahpra) or MCNZ regarding registration and implications for future practice prior to applying for exemption/variation.

5.1. Evidence to support application

Applicants must provide appropriate evidence to substantiate the circumstances for which an exemption or variation is sought at the time of application. Examples of acceptable evidence include:

- medical certificate for illness, incapacitation, trauma or expected delivery date, including dates unfit or unable to work
- birth certificate or adoption certificate for parental leave applications
- for cultural responsibilities, a written and signed statement from a cultural leader, or recognised representative / elder or statutory declaration from the applicant
- written confirmation of extended leave from employer
- police report
- insurance report
- death certificate
- statutory declaration from the applicant or other relevant party attesting to impact of the exceptional circumstance on the applicant's ability or capacity to undertake required CPD activities.

6. VARIATION TO CPD REQUIREMENTS

CPD Participants granted an exemption for less than a full CPD year may be required to complete a pro-rata number of CPD hours across each category (Category 1: Educational Activities; Category 2: Reviewing Performance; Category 3: Measuring Outcomes), in accordance with Table 1.

Variations to the way in which the minimum CPD standards are met will be considered on a case-by-case basis taking into account the CPD participant's individual circumstances

Table 1. Minimum CPD requirements for exemptions of less than and up to 12 months

Approved exemption period	Total reduction in CPD hours	Total minimum hours required Inc 2 hrs for PDP	Minimum Cat 1 activities (hours)	Minimum Cat 2 and/or Cat 3 activities (hours)
Less than 6 months (No exemption)	0	50	12.5	25
6 months (but < 7 months)	24	26	6	12.5
7 months (but < 8 months)	28	22	5	10
8 months (but < 9 months)	32	18	4	8
9 months (but < 10 months)	36	14	3	6
10 months (but < 11 months)	40	10	2	4
11 months (< 12 months)	44	6	1	2
12 months (Full year exemption)	50	0*	0	0

* No Professional Development Plan required

7. CPD EXEMPTION AND VARIATION PROCESS

Step 1: Application

- CPD Participants are strongly encouraged to apply for an exemption or variation as soon as they become aware that their circumstances may limit their ability to comply with the CPD Standard.
- Exemptions cannot be granted after CPD compliance has been reported to the relevant regulatory authority (refer to section 8 of the RACP CPD Participation Policy).

- Applications must be complete and supported by appropriate documentation/evidence to enable an informed decision.
- Applications must be submitted using the RACP CPD exemption and variation request form to MyCPD@racp.edu.au (Australia) or; MyCPD@racp.org.nz (Aotearoa New Zealand).

Step 2: Assessment

- Applications are reviewed confidentially, without prejudice, and on their merits.
- The RACP CPD team will review the application and verify supporting documentation.
 - Applicants may be contacted if supporting evidence is insufficient or further information is needed
 - The RACP CPD Committee may be consulted where a request is complex.
- A determination is made based on the evidence provided and applicable CPD standards and policy.

Step 3. Outcome Notification

- The RACP aims to respond within two weeks of receiving a complete application. Requests for additional information may extend this timeline.
- Applicants will be notified of the outcome by email. The decision may be:
 - **Approved:** exemption or variation granted; or
 - **Not approved:** exemption or variation is not granted.
- Decisions made are subject to the RACP [Reconsideration Review and Appeals Process By-law](#).

Step 4. Reporting

- The RACP reports exemptions granted to CPD Participants to the relevant regulatory authority in accordance with mandatory reporting obligations.
- The RACP maintains records of all applications, decisions and related documentation.

8. CPD COMPLIANCE

CPD participations without an approved exemption or variation and fail to meet annual CPD requirements will not be issued with a CPD Certificate of Completion and will be reported to Ahpra/MBA/MCNZ as 'non-compliant' following the conclusion of the CPD year.

For medical practitioners registered in Australia, the MBA permits a **maximum** of three years of consecutive exemptions and/or variations for practitioners who meet the exemption/variation requirements. CPD Participants absent from practice between 12 months and up to and including 36 months must be familiar with [MBA recency of practice standards](#).

There are no additional requirements for CPD Participants who have been away from practice for a period of up to and including 12 months have no additional CPD requirements to return to practice.

Absences of 3 years or more may be subject to re-entry to practice requirements determined by the MBA and the MCNZ.

9. RACP MANDATORY REPORTING REQUIREMENTS

The RACP, as an accredited CPD Home, is required by regulatory bodies in Australia and Aotearoa New Zealand to monitor CPD participation, determine compliance or non-compliance with program requirements, conduct annual audits of CPD Participants and report CPD outcomes.

9.1. Australia

The RACP reports CPD compliance, non-compliance, exemptions and withdrawals to Ahpra within 6 months of the end of the CPD year (July). CPD Participants who do not complete their CPD requirements are subject to regulatory reporting. The MBA may impose conditions on registration or refuse registration where participants are non-compliant with minimum CPD requirements.

9.2. Aotearoa New Zealand

The RACP provides quarterly reports to the MCNZ on CPD participation. The RACP reports annual recertification compliance outcomes, including compliance and non-compliance, to MCNZ in April each year.

The RACP also notifies the MCNZ when a CPD participant fails to re-engage and satisfy program requirements, withdraws from the RACP CPD Program or is granted an exemption from CPD as these circumstances arise.

The MCNZ may impose conditions or refuse recertification where participants are non-compliant.

10. COMPLAINTS AND FEEDBACK

Complaints relating to the handling of an exemption or variation request will be managed in accordance with RACP [Complaint Management Policy](#).

11. DEFINITIONS

Term	Means
College	The Royal Australasian College of Physicians, ACN 000 039 047, an incorporated body limited by guarantee.
CPD	Continuing professional development
CPD Committee	A governance group overseeing the strategic direction and quality of the CPD Program, ensuring it meets strategic goals and regulatory standards
CPD Home	As defined by the MBA: <i>“An organisation that is accredited by the Australian Medical Council to provide a CPD program(s) for</i>

Term	Means
	<i>medical practitioners. This organisation may be an education provider, another organisation with primary educational purpose, or an organisation with a primary purpose other than education.”</i>
CPD Participant	All CPD Participants of the RACP CPD Program including Fellows, trainees, CPD users, CPD interrupted trainees, eligible OTPs
CPD User	A CPD Participant in the RACP CPD Program who does not hold Fellowship, is not enrolled in an RACP training program and is not undertaking OTP assessment
CPD Interrupted trainee	A trainee of the College who interrupts their training for more than 6 months, does not meet the MBA exemption criteria and nominates the RACP as their CPD Home (for a nominal fee) in order to meet the requirements
Exemption	Exempt from all CPD requirements for the relevant CPD calendar year
Non-Practicing Registration	A medical professional registered as “non-practicing” with the MBA or the MCNZ are not required to comply with the CPD registration standard
OTP	Overseas trained physician or paediatrician under assessment via the specialist pathway in Australia.
Practice	<p>MBA defines Practice as “<i>Any role, whether remunerated or not, in which the individual uses their skills and knowledge as a health practitioner in their profession. For the purposes of this policy, practice is not restricted to the provision of direct clinical care. It also includes management, administration, education, research, advisory, regulatory or policy development roles</i>”</p> <p>Practitioners who retire from practice have ongoing registration requirements until they move to non-practising registration or are no longer registered.</p>
STT	Short term trainee is an international medical graduate (IMG) who is qualified specialist or specialist in training outside of Australia, on a training program of up to 24 months duration in a specialty area in Australia. STT is not accredited by RACP and does not lead to Fellowship.
Variation	A variation relates to a requirement that may be met in a different way

12. USEFUL LINKS AND RESOURCES

- RACP CPD exemption and Variation Request Form
- RACP Continuous Professional Development Participation Policy
- [MyCPD Handbook – Exemptions / Withdrawal \(including retirement\)](#)
- Medical Board of Australia (MBA): [Registration standard: Continuing professional development](#)
- MBA: [Medical Board of Australia - Recency of practice](#)
- Te Kaunihera Rata o Aotearoa/ Medical Council of New Zealand (MCNZ): [Policy on recertification](#)
- MCNZ: [Recertification for doctors practising in a vocational scope of practice](#)
- [MCNZ Policy on Practising Certificates - July 2016](#)
- [MCNZ Policy on Practising certificate applications for doctors who have not lawfully practiced medicine within the previous 3 years](#)

13. VERSION HISTORY

Version	Date effective	Approved by	Amendments
V1	March 2026	CEC	Extraction of Exemption information from CPD Participation Policy to create standalone CPD Exemption Policy. New variation information introduced in policy.