

Audit Policy

Effective: January 2023

Introduction

doctorportal Learning Pty Ltd, trading as 'CPD Home' is a wholly owned subsidiary of the Australian Medical Association (WA) Inc.

CPD Home is available to non-exempt medical practitioners in Australia at www.cpdhome.org.au. It is not limited to members of the AMA.

Background

CPD Home is committed to supporting its subscribers:

- to undertake meaningful professional development;
- to meet their Continuing Professional Development (CPD) requirements under the Medical Board of Australia (MBA) *Registration Standard: Continuing Professional Development* (the Standard); and
- to easily demonstrate that they have done so should they be audited by the MBA.

CPD Home under the *Criteria for AMC Accreditation of CPD Homes* is required to regularly audit medical practitioners' CPD records to assess the completeness of evidence and educational quality of activities undertaken.

CPD Home is also committed to the continuous improvement of its CPD Program and the services it provides to its subscribers. CPD Home's audits of subscribers will also facilitate the identification of trends or provide an indication of where our CPD Program or service provision could be improved.

Purpose

In auditing subscribers, CPD Home:

- demonstrates its compliance with the Criteria for AMC Accreditation of CPD Homes;
- provides an accountability mechanism that supports and substantiates participating subscribers' compliance with the MBA's *Registration Standard: Continuing Professional Development* (the Standard);
- provides assurance to the community that the CPD activities participating subscribers undertake are relevant to their registered scope of practice and aimed at improving their practice; and
- enables early identification of subscribers who may need support with:
 - preparing their written continuing professional development (CPD) plan;
 - identifying compliant CPD activities;
 - progressing, recording, verifying and keeping track of these activities against the Standard; or
 - accessing some other intervention afforded in response to an exceptional circumstance or special consideration; and
- provides a mechanism for informing its own quality improvement activities.

Objective

To inform subscribers how CPD Home will fulfil its audit obligations as a CPD home, and to outline the process for undertaking audits in order to monitor and support subscribers' progression to completion of their CPD requirements.

Scope

This policy applies to all subscribers of CPD Home.

Definitions

The following definition(s) apply to this policy and where applicable, its procedures.

Term	Definition
Audit Run	SQL query report selecting key data metrics to inform CPD Home of subscriber progress against their CPD requirements.
CPD Home Program of Learning	The CPD Home Program of Learning (CPD Program) provides a pathway for Australian registered medical specialists, international medical graduates, PGY2+ trainees and non-vocationally registered doctors to engage in an accredited CPD program. From 1 January 2023, the CPD Program is a mandatory program for subscribers to the CPD Home service.
CPD requirements	Means CPD requirements against the Standard, including program-level requirements, and any relevant specialist high-level requirements, as follows: <ul style="list-style-type: none"> • develop a written annual continuing professional development (CPD) plan; • complete a minimum of 50 hours per year of CPD activities relevant to the registered scope of practice and individual professional development needs; • allocate a minimum 50 hours per year between the following types of CPD activities: <ul style="list-style-type: none"> ○ at least 12.5 hours (25 percent of the minimum) in educational activities; ○ at least 25 hours (50 percent of the minimum) in activities focused on reviewing performance and measuring outcomes, with a minimum of five hours for each category; and ○ the remaining 12.5 hours (25 percent of the minimum), and any CPD activities over the 50-hour minimum across any of these types of CPD activity; • self-evaluate achievement of the CPD plan goals at the end of the year in preparation for the next year; and • retain records of annual CPD activity for auditing purposes by CPD Home and the Medical Board of Australia for three years after the end of each one-year cycle.
CPD Year	1 January to 31 December
Deferral	Where a subscriber is afforded additional time in which to demonstrate compliance with the Standard.
Participating Subscribers	Subscribers to CPD Home who do not have an exemption and who by default are participating in the 'CPD Program'.
Subscribers	Subscribers to CPD Home may be members of the AMA or non-member medical practitioners who have selected us as their CPD Home.

the Standard	MBA's <i>Registration Standard: Continuing Professional Development</i> .
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Policy

Subscriber Monitoring: CPD Home will monitor 100% of participating subscriber CPD completions, to ensure they are compliant with and tracking towards meeting their annual CPD requirements.

Where participating subscribers are identified as being at risk of not meeting their CPD requirements for the CPD year, CPD Home will contact the subscriber to encourage engagement and provide any required support and guidance.

In line with our Compliance and Remediation policies we will work with participating subscribers to eliminate any gaps in compliance and to minimise the administrative impact in the event they are selected for Audit by the MBA and/or CPD Home.

CPD Home will complete quarterly audit runs to monitor 100% of subscriber progress towards meeting their CPD requirements.

Subscribers who have been granted an exemption for meeting their CPD requirements will be excluded from quarterly audit runs.

Subscribers granted a variation or deferral of CPD requirements will continue to be monitored via quarterly audit runs. However, they will be excluded from automated notifications and instead will be followed-up by the CPD Home Support Officer as appropriate to the conditions of their variation or referral.

Subscriber Audits: In the first quarter of each CPD Year commencing 2024, CPD Home will audit at least 5% of subscribers from the previous CPD Year to ensure CPD compliance against the standards framework. These audits will be conducted randomly save for subscribers who are exempt from participating.

Roles and Responsibilities

Subscribers

Subscribers have a responsibility to:

- develop their annual written CPD plan having given thought to their previous year's CPD plan
- participate in CPD activities that align with their registered scope of practice and written CPD plan goals
- actively work towards meeting the annual CPD requirements in accordance with the CPD Program
- complete all required CPD activities by 31 December and upload all supporting documentation by 28 February
- produce documentary evidence of CPD Program completion if audited by the MBA
- advise CPD Home in writing if they are concerned about completing the CPD Program requirements within the CPD Year.

CPD Home Support Officer

A CPD Home Support Officer will support subscribers with meeting their CPD Program requirements by:

- ensuring subscribers are aware that the issuance of an annual CDP Statement of Compliance is dependent on meeting the CPD Program requirements;
- providing guidance to:
 - complete and update their 'Learning Profile';
 - write their CPD Plan;
 - identify relevant CPD activities;
 - record undertaken CPD activities; and
 - upload accepted documentary evidence of completion of a CPD activity.
- notifying subscribers collectively or individually if deemed at risk of not meeting the CPD Program requirements;
- offering an individual subscriber support where consent is provided;
- referring at-risk subscribers to the AMA CPD Home Exceptional Circumstances and Special Consideration Policy.

Any trends emerging from the CPD Home audits will be analysed and reported to the AMA (WA) CEO for quality improvement and ensuring adequate resourcing.

Action

Subscriber monitoring

Subscribers will be assessed as at risk of not meeting their CPD requirements for the CPD Year against the following criteria.

- Completion of a written CPD plan (by 31 March)
- Three focus topics are tagged in 'Learning Profile'
- Planned learning activities have been identified and cover:
 - at least one program-level requirement for each domain of learning, and
 - if applicable, relevant specialist high-level CPD requirements
- The number of hours recorded against:
 - Domain 1: Educational Activities
 - Domain 2: Reviewing Performance and Measuring Outcomes
- Recorded reflections for completed CPD activities
- Presence of accepted supporting CPD evidence.

Subscribers deemed to be at risk of not meeting their CPD Program requirements for the CPD Year will be contacted by CPD Home. In contacting at risk subscribers, CPD Home will email a notification that they may be at risk of not meeting their CPD Program requirements with advice on what action to take to keep on track, including reaching out to a CPD Home Support Officer (contact details will be provided). Notifications will be prepopulated from the data extracted in the audit report.

At the start of Quarter 2, 3 and 4, the CPD Home newsletter will include a de-identified aggregated breakdown of subscribers on track or at risk. This will include compliance against the abovementioned criteria, to help inform and encourage subscribers to act to keep their CPD on track.

At the end of the following month a Secondary Audit will be run to assess if there has been any activity by the subscriber in response to the notification. Should no activity be recorded on the CPD Tracker, the at-risk subscriber will be personally contacted by a CPD Home Support Officer who will offer support and guidance to assist them progress towards completion. Should the subscriber be experiencing exceptional circumstances that would make them eligible for a special consideration, the CPD Home Support Officer will offer guidance on seeking a variation to, or exemption from, their CPD requirements.

Quarterly audit runs to monitor 100% of subscribers will be performed as follows:

Qtr.	End of Period	Date of Primary Audit Run	Assessment Protocol	Supporting documentation	Automated Notifications Sent to At Risk subscribers	Date of Secondary Audit Run	Personal Contact made
1	31/03	30/04	No written CPD plan		Within next 5 working days	31/05	Within next 5 working days
2	30/06	30/07	Less than 50% of required CPD hours recorded	Supporting documents uploaded to 75% recorded activities	Within next 5 working days	31/08	Within next 5 working days
3	30/09	30/10	Less than 75% of required CPD hours recorded	Supporting documents uploaded to 75% recorded activities	Within next 5 working days	30/11	Within next 5 working days
4	31/12	30/01	Less than 100% of required CPD hours recorded	Supporting documents uploaded to 100% recorded activities	Within next 5 working days	28/02	Within next 5 working days

Subscriber audits

At the conclusion of the CPD Year, CPD Home will audit at least 5% of subscribers in the first quarter of the following year. For each subscriber audited, CPD Home will verify the following minimum criteria is met.

1. Completion of a written CPD plan addressing the minimum program requirements including the four required areas of cultural safety, addressing health inequities, ethics and professionalism.
2. Substantiation that completed activities are accurately recorded against the annual CPD Home Program requirements.
3. Substantiation of the quality and relevance of completed activities by:
 - a. confirming alignment with the written CPD Plan
 - b. confirming hours accredited by another CPD home
 - c. confirming alignment to the Good Medical Practice: A code for doctors in Australia
 - d. confirming alignment with at least 50% of the CPD Home Activity Accreditation Criteria
4. Validation that the minimum number of hours has been reached for each Domain of Learning and in total.
5. Validation that each CPD activity undertaken aligns with the subscriber's registered scope of practice and/or identified learning needs.
6. Substantiation that uploaded evidence aligns to the CPD Home Program Appendix 1: CPD evidence options by CPD activity content type.

7. Confirmation that speciality high-level CPD activities have been completed within required period, where required by subscriber registered scope of practice.
8. Completion of reflection against the learning activity highlighting what has been learned and how it could be applied/implemented to enhance patient safety/care.
9. Completion of reflection on learning goals at the end of the CPD Year.

Where a medical practitioner has a limited or niche scope of practice, CPD Home may convene an ad-hoc panel of peers to advise on whether the learning activities undertaken by the Subscriber being audited are relevant to their scope of practice and align with their CPD Plan.

Where a subscriber is deemed to have not met their CPD compliance requirements for the previous CPD Year, appropriate steps will be put in place by CPD Home to support the Subscriber and ensure compliance by 30 June.

Related Documents / Legislation

The following documents are related to this policy.

1. CPD Home CPD Program
2. Criteria for AMC Accreditation of CPD Homes
3. MBA Registration Standard: Continuing Professional Development
4. CPD Home Participation and Compliance Policy
5. CPD Home Exceptional Circumstances and Special Consideration Policy
6. Application for Special Consideration of Exceptional Circumstance

Appendices

1. Glossary

Version Tracking

Version	Date	Comments
1.0	December 2022	
1.1	January 2023	Amended to include Subscriber Audit process.
1.2	February 2023	Guidance on when peer review of CPD activity claims by a medical practitioner with a limited or niche scope of practice may be required.

Appendix 1 Glossary

Term	Definition
Appeal	Of a decision, to be undertaken by an Appeals Committee, an ad-hoc committee of the AMA (WA) Board.
Applicant	Any Subscriber or Education Provider directly affected and unsatisfied with an CPD Home decision who applies to have the decision reviewed, reconsidered or appealed.
Aphra	Australian Health Practitioner Regulation Authority
Certified Learning Provider	A learning provider who is certified by CPD Home, and can apply for accreditation of a CPD activity for listing in the CPD Learning catalogue.
Conflict of Interest	<p>A conflict of interest occurs when a person's personal interests' conflict, or could be perceived to conflict, with their responsibility to act in the best interests of CPD Home.</p> <p>Conflict of interests may be:</p> <ul style="list-style-type: none"> • Real – where a direct conflict exists between the decision maker and their duty to act in the best interests of CPD Home. • Apparent – where it appears or could be perceived that personal interests are influencing the decision maker to not act in the best interests of CPD Home. • Potential – where personal interests are not currently but could come into conflict with their duty to act in the best interests of CPD Home.
CPD Advisory Panel	Panel of medical advisers which provides advice to the AMA (WA) CEO and senior leadership team regarding the CPD Home Program.
CPD Home 'Catalogue'	This is the catalogue of learning modules and readings available to CPD Home subscribers.
CPD services	Carrying out 'CPD Home' related functions or activities offered to subscribers.
CPD Tracker	Online tracking tool enabling subscribers to record courses, events and other completed CPD activities. Each CPD activity record includes the length of time, area for self-reflection and optional storage of learning evidence.
Learning Providers	Entities who deliver education or learning to doctors.
CPD Home Executive	Includes the AMA (WA) CEO, Chief Operating Officer and Chief Financial Officer
CPD Home Managers	Line managers responsible for a particular area of the CPD Home business.
CPD Home Program of Learning	The CPD Home Program of Learning (CPD Program) provides a pathway for Australian registered medical specialists, international medical graduates, PGY2+ trainees and non-vocationally registered doctors to engage in an accredited CPD program. From 1 January 2023, the CPD Program is a mandatory program for subscribers to the CPD Home service.
CPD Home Staff	Includes employees or contracted consultants, legal or financial professionals acting for CPD Home
CPD requirements	<p>Means CPD requirements against the Standard, as follows:</p> <ul style="list-style-type: none"> • develop a written annual professional development plan; • complete a minimum of 50 hours per year of CPD activities that are relevant to your scope of practice and individual professional development needs; • allocate your minimum 50 hours per year between the following types of CPD activities:

	<ul style="list-style-type: none"> ○ at least 12.5 hours (25 percent of the minimum) in educational activities; ○ at least 25 hours (50 per cent of the minimum) in activities focused on reviewing performance and measuring outcomes, with a minimum of five hours for each category; and ○ the remaining 12.5 hours (25 percent of the minimum), and any CPD activities over the 50-hour minimum across any of these types of CPD activity, including any relevant specialty high-level requirements; <ul style="list-style-type: none"> ● self-evaluate your CPD activity at the end of the year as you prepare your professional development plan for the next year; and ● retain records of your annual CPD activity for audit by your CPD home and the Board for three years after the end of each one-year cycle.
CPD Year	The CPD Year is 1 January to 31 December.
Complaint	Dissatisfaction or concern about the conduct or actions of CPD Home expressed in a written complaint submitted via the CPD Home Complaint Form by a: <ul style="list-style-type: none"> ● Subscriber to CPD Home services; ● CPD Home Education or Service Provider; or ● Member of an CPD Home decision making or advisory entity.
Complaints Officer	A CPD Home staff member trained in complaints handling and delegated the responsibility for managing a complaint.
Cooling off period	A 14 day period in which the subscriber can change their mind about subscribing without penalty.
CSV File	Comma Separated Value - A electronic file in which the data in each data field is separated by a comma.
Decision maker	Any person or persons making decisions for or on behalf of CPD Home.
Deferral	An extension of time, up to three months from the end of the CPD Year, in which to complete the CPD requirements for that CPD Year. The deferred CPD activities to be undertaken concurrently with the current CPD Year requirements.
eDM	Electronic Direct Mail
Exemption	CPD requirements for the CPD Year are waived.
Exit Poll	A series of questions to ascertain reasons for subscription cancellation and identify areas for improvement.
Frivolous report or complaint	The matter giving rise to the report or complaint is minor or trivial, vague or poorly explained inhibiting its investigation, or unable to be substantiated?
Learning Management System (LMS)	Online system used to deploy, track and report completion of learning activities measured against the CPD Program.
Malicious report or complaint	A report or complaint that appears to be motivated by a purpose that is dishonest and intended to cause harm.
Parent Entity	doctorportal Learning Pty Ltd, trading as 'CPD Home' is a wholly-owned subsidiary of the Australian Medical Association (WA) Inc.
Participating Subscribers	Subscribers to CPD Home who do not have an exemption and who by default are participating in the 'CPD Program'
Personal information	Personal information includes a broad range of information such as name, gender, contact details, financial information and may also include other personal information (e.g. professional details) or an opinion, that could identify an individual. What is personal information will vary, depending on whether a person can be identified or is reasonably identifiable in the circumstances.
Personal interest	Personal interests include where the decision maker or a person or organisation affiliated with them would receive a benefit or incur a

	detriment because of the decision being made. That benefit or detriment could be financial or non-financial.
Point-in-Time Snapshot	A Point-in-Time snapshot is a copy of a storage volume, file or database as they appeared at a given point in time and is used as a method of data protection. In the event of a failure, data can be restored from the most recent snapshot before the failure.
Procedural matters	Refer to an application for a Review or Appeal of a CPD Home decision.
Sensitive information	Sensitive information is personal information that includes information or an opinion about an individual's: <ul style="list-style-type: none"> • racial or ethnic origin • political opinions or associations • religious or philosophical beliefs • trade union membership or associations • sexual orientation or practices • criminal record • health or genetic information • some aspects of biometric information
Subscribers	Subscribers to CPD Home may be members of the AMA or non-member medical practitioners who have selected us as their CPD Home.
Professional details	Professional details include information such as qualifications, scope of practice, specialty or specialties, employment information (status, type, role), and educational/supervisory/research activities.
Outgoing Subscribers	Subscribers who are moving to a different CPD home provider.
CPD Home staff	Includes employees or contracted consultants, legal or financial professionals acting for CPD Home
Reconsideration	Of a decision, to be undertaken by the original decision maker
Review	Of a decision, to be undertaken by a Review Panel
Review Panel	A panel comprised of three people chosen at the discretion of the CEO or their delegate for purpose of reviewing a decision under the Review, Reconsideration and Appeals Policy. The Review Panel shall not include a member who participated in the original decision or its reconsideration, or who otherwise has, or is perceived to have, a conflict of interest.
Register of Interests	A record of declared or identified conflicts of interests listing to whom they apply, the nature and extent of the conflict and any steps taken to address it.
the Standard	MBA <i>Registration Standard: Continuing Professional Development</i>
Variation	The hours for each domain of CPD activity as per the Standard for the CPD Year are proportionally reduced to reflect the period where the subscriber did not practise medicine.
Vexatious report or complaint	A report or complaint that is falsely made, unwarranted or made repetitively, or made for some other collateral purpose such as to cause delay or disruption, gain leverage or cause disadvantage or to harass or annoy.