

Financial Hardship 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 meet their Continuing Professional Development (CPD) requirements under the Medical Board of Australia (MBA) *Registration Standard: Continuing Professional Development* (the Standard). However, CPD Home recognises that there may be times where a subscriber may be in financial hardship and may need some special consideration to ensure they can continue to meet their CPD requirements and maintain their professional registration.

Determinations of this nature will, in line with the principles of natural justice and procedural fairness, be made by the AMA (WA) CEO, or the person to whom the CEO has delegated their powers in this respect, following receipt of an *Application for Recognition of Financial Hardship*.

Purpose

To guide decisions on the consideration of financial hardship for:

- payment of subscription fees; and
- payment or waiving of fees for procedural matters, such as review or an appeal made in line with our Reconsideration, Review and Appeals Policy.

Objective

To clarify for subscribers our policy regarding considerations of financial hardship.

Scope

This policy applies to subscribers of CPD Home.

Definitions

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

Term	Definition
CPD Home Decision Maker	The CEO of AMA (WA), or the person to whom the CEO has delegated their powers in this respect.
CPD Home Executive	Includes the AMA (WA) CEO, Chief Operating Officer and Chief Financial Officer.
CPD Year	The CPD Year is 1 January to 31 December.
Financial hardship	You're considered to be in financial hardship when unable to provide the following for yourself, your family, or other dependents: <ul style="list-style-type: none"> • Food • Accommodation • Clothing • Medical treatment

	<ul style="list-style-type: none"> • Education, and/or • Other basic necessities <p>CPD Home understand that financial hardship may arise for a variety of reasons including family tragedy, financial misfortune, mental health challenges or impacts of a natural disaster¹.</p>
Subscription fee	The fee payable by an individual when choosing or confirming us as their CPD home.

Policy Principles

CPD Home recognises that financial hardship is a challenging experience for individuals, and this may make it difficult at times to pay their subscription fees. The ability to continue to access a CPD home and meet CPD requirements as part of professional registration requirements during such times contributes to the maintenance of an individual's employment opportunities and their ability to improve their financial situation.

While we acknowledge that our subscribers are not immune from experiencing financial hardship it is our expectation that for most this would be a temporary state, that can be resolved.

CPD Home will only consider applications of financial hardship from existing subscribers.

The services we provide are primarily funded through the collective fees paid by CPD Home subscribers. While no waiver of subscription fees is available, where subscribers are experiencing financial hardship, we can offer payment by instalment to support them in meeting their financial obligations. Instalments are split across two payments six months apart.

Before applying for consideration of financial hardship we expect our subscribers to have made reasonable attempts to access funds from appropriate sources to pay their subscription fee in full.

Consideration may be given on a case-by-case basis to waiving the applicable fee for procedural matters only, such as review or an appeal made in line with our [Reconsideration, Review and Appeals Policy](#).

Your privacy is important to us. Any information we need to know about your situation will be kept confidential and in accordance with the requirements of the Privacy Act 1988.

Requirements for initial application

A recognition of financial hardship is only applicable for the current CPD Year. There will be no retrospective recognition of financial hardship.

Recognition of financial hardship for subscription fees

CPD Home will consider applications for financial hardship from individuals regarding their subscription fees **up to 15 days before their subscription is due**. Subscribers who have not paid their subscription fee or applied for recognition of financial hardship by the due date risk being declared non-subscribers and having their record deleted as per our *Data Management Policy*.

Subscribers seeking recognition of financial hardship for subscription fees are required to:

¹ Drawn from the definition used by the [Australian Tax Office](#) to define serious hardship.

- determine if their individual circumstances meet the definition of financial hardship in this policy and that they have made reasonable attempts to access funds from appropriate sources to pay their subscription fees;
- make a statutory declaration, that they are experiencing genuine financial hardship; and
- attach the statutory declaration to a completed *Application for Recognition of Financial Hardship* and submit it.

Recognition of financial hardship for procedural matters

CPD Home will consider applications for financial hardship from individuals regarding fees payable for a procedural matter, such as when applying for a review or appeal of a CPD Home decision.

Subscribers seeking recognition of financial hardship for fees payable for procedural matter are required to:

- determine if their individual circumstances meet the definition of financial hardship in this policy and that they have made reasonable attempts to access funds from appropriate sources to pay their subscription fees; and
- make a statutory declaration, that they are experiencing genuine financial hardship.

As a statutory declaration is a legal statement attesting to the truth of a matter it will suffice as documentary evidence for the purposes of most initial applications. Nevertheless, we reserve the right to, and may ask you to provide additional documentary evidence to support your application for recognition of financial hardship.

Requirements for a consecutive application

Given the principal that financial hardship is for most a temporary state that can be resolved, applications for recognition of financial hardship are expected to be a one off. Where this is not the case, we will consider applications for one additional year, on a case by case basis, and request additional documentary evidence to support the consecutive application.

Where a subscriber has been granted a split payment it is expected that payment will have been received before considering a further application.

Additional documentary evidence

We may ask you to provide recent evidence to support your claim for recognition of financial hardship. Your evidence should support your current financial circumstances. Any documents you provide should be dated within four weeks of supplying them.

Types of evidence can include the following:

- official eviction notice (not a warning of possible eviction due to rental arrears)
- pending disconnection of essential services, like water, electricity or gas (does not include mobile phone or internet bills)
- notice of impending legal action
- letter from a charitable organisation regarding loss of employment or inability to provide for necessities
- bank notice, for example, overdraft call or mortgaged property repossession
- overdue medical bills
- letter from a doctor verifying the inability to earn an income due to illness or caring for a sick family member
- final notice from school regarding payment of mandatory fees
- funeral expenses
- repossession notice of essential items, like a car or motorcycle.

Evidence that the practitioner is experiencing financial abuse

We take many factors into account when assessing your claim for recognition of financial hardship. Providing one or more of the documents listed above may not necessarily result in you being granted financial hardship status.

The above types of evidence are pursuant to the *Australian Tax Office - Evidence of serious hardship*.

Roles and Responsibilities

Subscriber

If a subscriber considers they may be eligible for recognition of financial hardship they may, in line with the requirements of this policy, they should apply using the online Application for Recognition of Financial Hardship form available from the CPD Home website.

If recognition of financial hardship is granted, the subscriber is responsible for making any payments as outlined in their notification.

CPD Home Decision Maker

The CEO of AMA (WA), or the person to whom the CEO has delegated their powers in this respect, will assess the application and notify the subscriber within 7 days of receipt of the application, if recognition of financial hardship is granted and, of the schedule for payment or, if in relation to a procedural matter, any waiving of fees.

Action

If the application for recognition of financial hardship is approved, the subscriber will be required to pay their subscription in two payments of 50 per cent of their full subscription fee (i.e. member or non-member, whichever is applicable).

We will notify the subscriber confirming the fee for each of the payment instalments and the due dates, or, if in relation to a procedural matter, any waiving of fees.

Compliance (where applicable)

The CPD Home Executive will oversee the implementation and administration of this policy.

Failure on behalf of the subscriber granted recognition of financial hardship to lodge payments by either due date may result in the subscriber being declared a non-subscriber.

If a subscriber cannot meet a payment deadline they should advise CPD Home prior to the deadline. An extension may be granted on a case-by-case basis.

Related Documents / Legislation

The following documents are related to this policy.

1. CPD Home Application for Recognition of Financial Hardship
2. CPD Home Reconsideration, Review and Appeals Policy
3. CPD Home Data Management Policy
4. *Australian Taxation Office – Evidence of Serious Hardship*

Appendices

1. Glossary

Version Tracking

Version	Date	Comments
1.0	December 2022	

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;

	<ul style="list-style-type: none"> • 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; • 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.
Outgoing Subscribers	Subscribers who are moving to a different CPD home provider.
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.
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.
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.
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	<i>MBA 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.