

## Audit Policy

### Introduction

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

CPD Home is available to non-exempt medical practitioners in Australia at [www.cpdhome.org.au](http://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 audit 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 Standards)
- 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 metric to inform CPD Home of subscribers 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 2024, 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"> <li>• write an annual continuing professional development (CPD) plan</li> <li>• complete a minimum of 50 hours per year of CPD activities relevant to the registered scope of practice and individual professional development needs</li> <li>• allocate a minimum 50 hours per year between the following types of CPD activities <ul style="list-style-type: none"> <li>○ at least 12.5 hours (25% of the minimum) in educational activities</li> <li>○ at least 25 hours (50% of the minimum) in activities focused on reviewing performance and measuring outcomes, with a minimum of five hours for each category, and</li> <li>○ the remaining 12.5 hours (25% of the minimum) and any CPD activities over the 50-hour minimum across any of these types of CPD activity</li> </ul> </li> <li>• self-evaluate achievement of the CPD plan goals at the end of the year in preparation for the next year, and</li> <li>• 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</li> </ul>
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'
The Standard	MBA's <i>Registration Standard: Continuing Professional Development</i>

## Policy

Subscriber Monitoring: CPD Home will monitor 100% of participating subscribers 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 subscribers 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.

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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 its subscribers from the previous CPD year to ensure CPD compliance against the standard 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 written annual 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 CPD Statement of Compliance is dependent on meeting the mandatory CPD Program requirements
- providing guidance to:
  - 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 CPD Home Exceptional Circumstances and Special Consideration Policy.

Any trends emerging from the CPD Home audits will be analysed and reported to the Executive Lead 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 the CPD Plan
- 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 above-mentioned 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:

Q	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 with the written CPD plan
  - 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 periods, 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
1.3	August 2023	Updated Introduction to reflect the joint ownership of CPD Home. Replaced AMA (WA) Board with CPD Home Board, and CEO with Executive Lead to reflect current SOP. Removed unrelated glossary terms.

## Appendix 1 Glossary

Term	Definition
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
CPD Advisory Panel	Panel of medical advisers which provides advice regarding the CPD Home Program
CPD Home Managers	Line managers responsible for a particular area of the CPD Home business
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, including program-level requirements, and any relevant specialist high-level requirements, as follows:</p> <ul style="list-style-type: none"> <li>• write an annual continuing professional development (CPD) plan</li> <li>• complete a minimum of 50 hours per year of CPD activities relevant to the registered scope of practice and individual professional development needs</li> <li>• allocate a minimum 50 hours per year between the following types of CPD activities <ul style="list-style-type: none"> <li>○ at least 12.5 hours (25% of the minimum) in educational activities</li> <li>○ at least 25 hours (50% of the minimum) in activities focused on reviewing performance and measuring outcomes, with a minimum of five hours for each category, and</li> <li>○ the remaining 12.5 hours (25% of the minimum) and any CPD activities over the 50-hour minimum across any of these types of CPD activity</li> </ul> </li> <li>• 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</li> </ul>
CPD Year	The CPD year is 1 January to 31 December
Decision maker	Any person or persons making decisions for or on behalf of CPD Home.
Participating subscribers	Subscribers to CPD Home who do not have an exemption and who by default are participating in the 'CPD Program'
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 practice medicine