

Financial Hardship 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. 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's (MBA)'s *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 Executive Lead, or the person to whom the Executive Lead 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
- 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

Please refer to the Glossary for definition(s) of terms that apply to this policy.

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 a 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:

- 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
- 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
- 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*.

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 Lead 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*
5. Privacy Act 1988
6. Application for Recognition of Financial Hardship

Appendices

1. Glossary

Version Tracking

Version	Date	Comments
1.0	December 2022	
1.1	September 2024	Updated Introduction to reflect the joint ownership of CPD Home. Replaced AMA (WA) CEO with Executive Lead, and AMA (WA) Board to CPD Home Board to reflect current SOP. Amended Australian Health Practitioner Regulation Authority to Australian Health Practitioner Regulation Agency. Referenced Privacy Act 1988, and Application for Recognition of Financial Hardship in the Related Documents/Legislation section. Removed unrelated glossary terms.
1.2	October 2024	Added Definitions statement and edited glossary. Transferred roles and responsibilities to SOP. Updated minor amendments.

Appendix 1

Glossary

Term	Definition
Appeal	Of a decision, to be undertaken by an Appeals Committee, an ad-hoc committee of the CPD Home Board.
Decision maker	Any person or persons making decisions for or on behalf of CPD Home.
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 • education • other basic necessities.
Procedural matters	Refer to an application for a Review or Appeal of a CPD Home decision.
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 Executive Lead or their delegate for the 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.