

S U P R E M E C O U R T O F I N D I A
R E C O R D O F P R O C E E D I N G S

Writ Petition(s) (Civil) No(s). 473/2025

ASSOCIATION OF DOCTORS AND MEDICAL STUDENTS (ADAMS) Petitioner(s)

VERSUS

UNION OF INDIA & ORS.

Respondent(s)

Date : 21-04-2026 This petition was called on for hearing today.

CORAM : HON'BLE MR. JUSTICE PAMIDIGHANTAM SRI NARASIMHA
HON'BLE MR. JUSTICE ALOK ARADHE

For Petitioner(s) :Mr. P.V. Dinesh, Sr. Adv.
Mr. Zulfiker Ali P. S, AOR
Ms. Anna Oommen, Adv.
Mr. Praveen Kumar Mishra, Adv.
Ms. Lebina Baby, Adv.

For Respondent(s) :Mr. Ankit Goel, AOR
Mr. Manish Kumar, Adv.
Mr. Mayank Tiwari, Adv.

UPON hearing the counsel the Court made the following
O R D E R

1. The issue relating to the necessary physical onsite working, as a compensation for the online studies undertaken by foreign medical students who have pursued their MBBS courses at medical institutions outside India has now been reconsidered by the National Medical Commission. Through a public notice dated 18.03.2026, the Commission has issued a clarification with respect to;

(i) Foreign Medical Graduates (FMGs) who had a break in their penultimate and final years and returned to India owing to the COVID-19 pandemic or war situation and completed their course (including examinations) through online mode, and

(ii) the requirement of physical, onsite compensatory classes in lieu of online classes undertaken by FMGs pursuing medical education, in institutions outside India, respectively.

2. Mr. P.V. Dinesh, learned Senior Counsel submits that the present petition under Article 32 can be disposed of in terms of the letter. The Notification dated 18.03.2026 is extracted herein for ready reference:

" No. U-15024/15/2024-UGMEB(Pt) (e-8389863)

Government of India
National Medical Commission

Sector-8, Dwarka
New Delhi-110077
Date: 18-03-2026

To,

Registrar of SMCs of all States/Uts

Subject: Physical onsite compensation for online studies undertaken by foreign medical students pursuing the MBBS course at medical institutions outside India -reg

Reference is invited to Public Notice No. U-15024/15/2024-UGMEB(Pt) (e-8389863) dated 18-03-2026 issued by the Under-Graduate Medical Education Board (UGMEB) on the above subject matter being self explanatory inter-alia issuing detailed clarifications to its earlier Public Notices dated 07-12-2023 and 19-6-2024 duly keeping in view various representations and requests for further clarifications as received from stakeholders and FMGs.

2. The earlier Public Notice dated 06-03-2026 on the subject issue, hence, stands withdrawn and is hereby superseded by this clarificatory Public Notice.

Dr. Raghav Langer
Secretary

National Medical Commission
(Under Graduate Medical Education Board)
Address: Pocket-14, Sector-8, Dwarka, Phase-1, New

Delhi-110077
Phone: 25367033, 5367035, 25367036,
Email: ug@nmc.org.in

No. U-15024/15/2024-UGMEB (PI) (E-8389863)

18th March, 2026

1. This Public Notice is issued as a clarification to the Public Notices dated 07.12.2023 and 19.06.2024 regarding (i) Foreign Medical Graduates (FMGs) who had a break in their penultimate and final years and returned to India owing to the COVID-19 pandemic or war situation and completed their course (including examinations) through online mode, and (ii) the requirement of physical, onsite compensatory classes in lieu of online classes undertaken by FMGs pursuing medical education, in institutions outside India, respectively.

2. Although the Commission has clarified the applicable requirements concerning the interpretation of the term sufficiently compensated and the requirement of undergoing clerkship in lieu of compensating online classes after the completion of the Compulsory Rotating Medical Internship (CRMI) at the stage of registration, however representations and requests for further clarification continue to be received from various stakeholders and FMGs. Accordingly, in order to ensure clarity and uniform implementation of the regulatory requirements, the Commission considers it appropriate to issue detailed clarifications.

3. The present clarification has been issued in clear and unambiguous terms to facilitate proper understanding and implementation. Accordingly, to avoid any further confusion, the Public Notice dated 06.03.2026 stands withdrawn and is hereby superseded by this clarificatory Public Notice.

4. The queries received and the corresponding clarifications have been presented in a tabular format and are appended to this Public Notice.

5. This issues with the approval of the competent authority.

Encl: A/a

(Dharmender)
Deputy Secretary, UGMEB

APPENDIX

Queries and Clarifications

Sl. No.	Query	Clarification
I	Applicability of Compulsory Rotating Medical Internship (CRMI) Regulations, 2021. Published on 18.11.2021, on Foreign Medical Graduates.	The CRMI Regulations, 2021 apply to Foreign Medical Graduates who took admission to their medical course on or after 18.11.2021, the date on which the regulations were notified. Such candidates are required to undergo one year of Compulsory Rotating Medical Internship in India after qualifying the Foreign Medical Graduate Licentiate Examination (FMGE) in accordance with the provisions of these Foreign Medical Graduate Licentiate Regulations, 2021. <u>Candidates who took admission before 18.11.2021</u> will be governed by the Screening Test Regulations, 2002. Such candidates are required to undergo CRMI in India only when they came back to India without undergoing mandatory internship as a part of the medical course in Foreign Medical Institute.
II	Foreign Medical Graduate (FMG) who have undertaken any part of the medical course through online mode, what will be the eligibility criteria for applying for registration in India?	• In cases where a Foreign Medical Graduate (FMG) who attended online classes during their penultimate and final years and were unable to compensate for such online instruction through physical classes at their parent foreign medical institute will have to undergo one year or two years of clerkship in India, as specified in public notice dated 07.12.2023, in lieu of the period of study conducted through online mode. • However, where the FMG produces a valid Compensatory Certificate as per the Public Notice dated 19.06.2024, issued by the parent foreign medical institution certifying that the online component of the course has already been compensated through physical classes along with internship program as a part of the course, through additional classes or extended course duration, as the case may be, supported, by relevant transcripts, such

		FMG shall be eligible for registration in India. • It is further clarified that FMGs governed by the Screening Test Regulations, 2002, who have already completed the required compensation and internship in physical mode at their parent foreign medical institution, shall not be required to undergo any additional CRMI in India.
III	What is the meaning of the term "Sufficiently Compensated" as stipulated in the Public Notice dated 19.06.2024?	• The term "Sufficiently Compensated" means that any period during which theory classes, practical training, or internship were conducted through online mode must be compensated by the Foreign Medical Graduate (FMG) through physical attendance at the parent foreign medical institute. • The foreign medical institute is expected to make, appropriate arrangements either by conducting additional/extra classes or by extending the duration of the course to enable the FMG to compensate for the online period. • This applies to the FMGs who are pursuing or yet to compensate the online classes. Those who have already compensated are required to submit the compensatory certificate, supported by relevant transcripts.
IV	Clarification with regard to completion of clerkship in India in lieu of online classes	• Foreign Medical Graduates (FMGs) who attended online classes during their penultimate and final years and were unable to compensate for such online instruction through physical classes at their parent foreign medical institute will be required to compensate the online classes by undergoing one year / two years of clerkship, as specified in public notice dated 07.12.2023, in lieu of

		the period of study conducted through online mode. • If a candidate/Foreign Medical Graduate (FMG) has cleared the FMGE and completed one year of Compulsory Rotatory Medical Internship (CRMI) in India, along with production of compensatory certificate or clerkship completion certificate, as the case may be, the FMG becomes eligible for the registration, subject to the satisfaction of the State Medical Council about the authenticity of the Compensatory Certificate, & if required, to be corroborated from the entry-exit details in the passport of the FMG.
V	Who has the primary responsibility to process applications of Foreign Medical Graduates (FMGs) to grant permanent registration in India?	The primary responsibility for processing applications of Foreign Medical Graduates (FMGs) rest exclusively with the respective State Medical Councils (SMCs), in consultation with the concerned State Directorate of Medical Education (DME) In this regard, the SMCs shall verify and ensure that: 1. The FMG has qualified the Screening Test/FMGL Examination; and 2. The FMG has duly completed the compensatory academic requirement, at the same foreign medical institution, duly verified and corroborated from the entry/exit records as reflected in the passport; If not, then the FMG must have undergone the required duration of clerkship in India, as prescribed in the public notice dated 07.12.2023; and State Medical Council shall not grant permanent registration unless it has verified that all required conditions such as onsite compensation for online study, or required clerkship as per the mandate of public notice dated 07.12.2023, and completion of the compulsory rotating internship have been met. Any registration granted without following these rules will be considered a regulatory violation.

3. Having perused the Notification dated 18.03.2026 and in view of the request of Mr. P.V. Dinesh, learned Senior Counsel, the writ petition is disposed of in terms of the Notification.

4. Pending application(s), if any, stands disposed of.

(SACHIN KUMAR SRIVASTAVA)
COURT MASTER (SH)

(NIDHI WASON)
ASSISTANT REGISTRAR