

Question-1: Has your authority identified the need to request proof of qualifications that are not covered by the currently tertiary education and the vocational education & training requirements currently listed in the slides 19 to 21? For example, for qualifications mentioned in Article 11(a) or Article 11(b).

No further education training/schooling gives an applicant any further rights or benefits. We only accept documents listed in the directive or other documents (if the title is different) that are presented with a certificate issued by the competent authority.

Question-2: Spain has submitted a separate proof for qualifications that do not fall under tertiary (higher) education diplomas but that refer to course/training that proves specialist competence and which may be required in addition to the diploma. Has your authority identified the need for requesting such proof?

All qualifications recognized under articles 21 and 23 require tertiary education. If some other documents must be presented then these are also listed in Annex V.

If we are talking about the registration of assistant pharmacists (the general system) then – in addition to the diploma - they only have to provide a certificate issued by the competent authority stating that they have a license. I don't know if there are any member states that train assistant pharmacists at a level below 3?

- Question-2.1: If the answer to the above is yes, would you re-use the description shown in slide 30 or would you need to revise it and how?

- Question-2.2: Would such proof need to be added to Level 2 proofs, alongside the general and vocational proofs shown in the diagram above, or would it be a type of general/vocational qualification?

B. Proof of absence of criminal record

Yes, we do not need an additional document regarding an absence of criminal record – if the competent authority issues a document proving that the person has the right to practice the profession and they are not being restricted or investigated from a professional point of view then that is enough.

C. Proof of absence of suspension/prohibition of practice

No history is needed, only information regarding the current situation.

D. Proof of change of name

This proof can only be issued by the corresponding competent authority.

For example, In Estonia, marriage is contracted by a local government of the county center (in Tallinn, Vital Statistics Office) official, a minister of religion or a notary. So the document must be issued by one of those instances (or an extract from the population register). If one has changed the

name because of other reasons then the local government can issue the document (or an extract from the population register).

The competent authority in the field of professional qualifications in health care will most likely know of the change of name but they do not perform the action in the first place. So if they have a document issued by the other competent authority and they have the right to forward this document to Health Board then they can do so – however, if the document is not in English then it also has to be translated.

E. Proof of acquired rights

Question-1: Does your comment mean that instead of having two separate requirements, like the ones shown in slides 34 & 35, it would be sufficient to have a single requirement “proof of compliance with acquired rights” that would cover all cases of Article 23?

Basically yes.

If the profession/speciality is to be recognized under article 23 then we need a certificate from the competent authority proving everything it has to prove based on article 23 + confirmation that the person is not suspended or restricted professionally. Whether the competent authority issues this information as one document or many – that is not relevant.

Question-2: What are your thoughts about merging compliance of qualifications with Annex V (slide 26) and compliance with acquired rights in a single requirement? For instance, using as name “proof of conformance to EU harmonised minimum training requirements” and as description “Proof that the evidence subject's (natural person) formal qualification conform to the harmonised minimum requirements as laid down in Chapter III, Title III of the Directive 2005/36/EC.”?

As long as the certificate also refers to the right article (21, 23), I have no objections.

Question-3: As the evidence provider, does your authority have such evidence of compliance ready for exchange, or would the applicant need to request it first for your authority to issue it and make it available for exchange?

If the qualification is automatically recognizable then we have the information.

If the qualification is to be recognized under article 23 then the applicant must first issue an application and proof of work experience to Health Board.

Just a thought: I think it would be unfair if one group has to first issue a separate application to Health Board while the other does not – it would mean that one group has to pay the state fee and the other does not.

F. Proof of diploma supplement/Proof of transcript

Question-1: Do you request any of these proofs for applicants falling under the general system?

If a person has acquired a speciality of specialised medical care in a Member State of the European Economic Area or Switzerland and the speciality does not exist in Estonia or the speciality acquired

by the person is not automatically recognised since it not listed for a particular country in Annex V, then yes, we do need a diploma supplement.

If the answer is yes:

- Question-1.1: Do the current definitions (slides 41-42) reflect the information needs of your authority?

Yes, I believe so.

- Question-1.2: The minimum information defined for the “proof of tertiary education transcript” (ID 3) is also contained in the current minimum information of the “proof of diploma supplement” (ID 312). Consequently, the information contained in the evidence of transcript would be a subset of the information that is contained in the evidence the diploma supplement. Does your authority still see both as relevant? Is there some other proof that may be relevant, e.g., for clarifying the extent/subject matters of the studies?

In most cases (the automatic recognition system) we do not need a diploma supplement or information about the subjects passed.

Documents proving the completed subjects must only be provided if the recognition falls under the general system (see the answer to [question 1](#)).