



MEMORANDUM

PRESENTED TO

DR. MANSUKH L. MANDAVIYA
HON'BLE UNION HEALTH MINISTER

BY

Thiru M.K. STALIN
HON'BLE CHIEF MINISTER
GOVERNMENT OF TAMIL NADU

ON

12th JANUARY, 2022

INDEX

Sl. No.	Agenda Items	Page Number
1	Admission Policy in Medicine and Opposition to National Eligibility Cum Entrance Test (NEET)	1
2	Expediting Construction and Establishment of AIIMS at Madurai	3
3	Establishment of New Government Medical Colleges in Six Districts.	5
4	Request for a New AIIMS Hospital in Coimbatore	7
5	All India Quota Abolition for Fully State Funded Medical Institutions	9
6	Reservation of 50% Seats in Super Speciality (DM / M.Ch.) Courses to the Tamil Nadu Government	11
7	Compulsory Rotating Medical Internship (CRMI)	13
8	Additional Funding under National Health Mission	15
9	Reservation of Seats for Service Candidates in the State Government Quota for the DM / M.Ch courses	17
10	Objection to the Draft Post Graduate Medical Education Regulations recently Circulated for Public Opinion	19
11	Proposal for Establishment of District Headquarters Hospitals in 19 Districts Across Tamil Nadu	23

1) ADMISSION POLICY IN MEDICINE AND OPPOSITION TO NATIONAL ELIGIBILITY CUM ENTRANCE TEST (NEET)

The Government of Tamil Nadu has been consistently opposing NEET for admission to Medical Courses. Considering the plight of the poor students in getting admission to medical seats, the Honourable Chief Minister made an announcement on 05.06.2021 to constitute a High Level Committee under the Chairmanship of Retired High Court Judge, Justice Thiru.A.K.Rajan. The above Committee under took a detailed study on whether the NEET based admission process has adversely affected the social, economic and federal polity and the students of rural and urban poor, those who studied in Government Schools, those who studied in Tamil Medium or any other section of students in Tamil Nadu and submitted its recommendations on 14.07.2021. An Official Committee of Secretaries under the Chairmanship of Chief Secretary was constituted to suggest appropriate measures to implement the recommendation of the High Level Committee. The Committee of Secretaries has suggested to promulgate an Act, similar to Tamil Nadu Act No.3/2007, indicating the need for elimination of NEET in Medical Education and get the President's assent for the same. This will ensure social justice and protect all vulnerable student communities from being discriminated in admission to medical education programmes. A Bill on the above lines has been introduced in the Assembly and sent to the Hon'ble Governor of Tamil Nadu for reconsidering the same to Government of India.

Government of Tamil Nadu may be allowed to fill all professional seats including MBBS / BDS/ AYUSH courses on basis of Class XII marks alone.

----- oOo -----

2) EXPEDITING CONSTRUCTION AND ESTABLISHMENT OF AIIMS AT MADURAI

The Government of India sanctioned establishment of the All India Institute of Medical Sciences (AIIMS) at Madurai and the foundation stone for the same was laid by the Hon'ble Prime Minister on 27.01.2019 at Thoppur, Madurai. 222.4 acres of land for the prestigious institution has already been transferred to the Government of India by the State Government. Government of India has identified the Japan International Cooperation Agency (JICA) as funding agency to this project. Though two years have lapsed, only a compound wall has come up at the designated site and there has not been any other physical progress in the establishment of the institution.

Mean while, the Executive Director, AIIMS, Madurai has proposed to set up new medical college (50 seats) under AIIMS Madurai from February / March 2022.

Hence, the Ministry of Health and Family Welfare, Government of India is requested to form a dedicated team of officers with adequate financial and administrative powers to finalize and commence the construction work. The State Government will extend full co-operation for the immediate commencement and early completion of the project.

----- oOo -----

3) ESTABLISHMENT OF NEW GOVERNMENT MEDICAL COLLEGES IN SIX DISTRICTS.

The Policy of the Government of Tamil Nadu is to establish one Government Medical College in each district in a phased manner. In Tamil Nadu, 25 Government Medical Colleges are functioning in 21 Districts. 11 New Medical Colleges are being established in 11 Districts under the Centrally Sponsored Scheme. At present, there are no Government Medical Colleges in the districts of Ranipet, Thirupattur, Kancheepurm, Perambalur, Tenkasi and Myladuthurai. In this regard, it is proposed to establish six new Government Medical colleges under the centrally sponsored scheme of establishing a Government Medical Colleges in districts without a Medical College.

Establishment of new medical college with hospital in the above six districts will immensely benefit the people especially the rural people. It is requested to sanction the same under the centrally sponsored schemes with 60:40 share by Centre and State Government. The approximate total cost towards building and equipment for non-recurring expenditure for 6 Medical Colleges will be Rs.2400 crore.

----- oOo -----

4) REQUEST FOR A NEW AIIMS HOSPITAL IN COIMBATORE

The Government of India have been sanctioning establishment of All India Institute of Medical Science (AIIMS) in different phases. Under Phase-V, sanction has been accorded for the establishment of the AIIMS at Madurai. It is learnt that more than one AIIMS have also been sanctioned to the States. AIIMS not only provides quality tertiary care, but also medical research, quality medical education including nursing and other para-medical courses. Establishment of AIIMS in western district or delta district of Tamil Nadu will further enhance the quality of tertiary care in these regions.

Accordingly, it is requested that a second AIIMS for Tamil Nadu may be sanctioned to Coimbatore. The Government of Tamil Nadu will provide the required land for the establishment of AIIMS.

----- oOo -----

5) ALL INDIA QUOTA ABOLITION FOR FULLY STATE FUNDED MEDICAL INSTITUTIONS

The Tamil Nadu is one of the States which has been undertaking high amount of investments in the Health Sector including primary, secondary and tertiary sectors. The State with its fund, it has been running 25 medical colleges. Only now, under the Centrally Sponsored shared schemes with the States on starting new medical colleges in every District by attaching them to existing district Headquarters Hospital. The State has been providing capital support to an extent of 60% while the balance 40% and the regular annual running expenditure is met by the State.

Despite huge amount of State fund investments, 50% of PG seats and 15 % of UG Seats are surrendered to All India Quota, based on the scheme drawn by the Supreme Court. Further, all the Super speciality seats are surrendered to All India Quota. This in effect serves as a huge disincentive to the State Governments which invest in Health by earmarking huge resources for running these medical education over all other priorities.

The other States which have not invested in Medical Colleges in effect get rewarded, despite minimal investments. Hence, It is requested that Government of India should examine abolition of the system of All India Quota, in respect of fully State funded medical institutions. Government of India can bring a legislation to allow such retention of all the States in respect of fully State funded Government Medical Colleges.

----- oOo -----

6) RESERVATION OF 50% SEATS IN SUPER SPECIALITY (DM / M.Ch.) COURSES TO THE TAMIL NADU GOVERNMENT

Before introduction of National Eligibility-cum-Entrance Test (NEET) in the year 2017 in State of Tamil Nadu, admission to Post Graduate Super Speciality courses have been done based on the marks obtained by the candidate in the entrance examination conducted by this State and marks for total service / practice after completion of Compulsory Rotatory Residential Internship Training. Further, 50 percent of the seats in each speciality in each college are ear-marked for the service candidates in addition to those service candidates selected in open category. With introduction of Section 10(D) of the Indian Medical Council (Amendment) Act, 2016, NEET - Super Speciality has been introduced as the single window entrance examination for admission to all Super Speciality DM / M.Ch Courses in the Country. As per the Information Bulletin for NEET - Super Speciality 2017, issued by the National Board of Examination, no State Government / Private Medical Colleges / Universities including the States of Jammu & Kashmir, Telangana and Andhra Pradesh are allowed to conduct any separate entrance examination for admission to the DM / M.Ch Courses for the academic year 2016-2017 and as such the admission for NEET - Super Speciality 2017 was made only on the basis of marks obtained by the candidate in the Common Entrance Examination conducted by the National Board of Examination. Therefore, 100% of seats in Super Speciality course in Tamil Nadu have been surrendered to All India Quota scheme from the year 2017.

In the light of the order passed by the Constitutional Bench of the Hon'ble Supreme Court of India in Writ Petition (Civil) No.196 of 2018 and based on the legal opinion and in order to protect the interest of the students hailing from Tamil Nadu, the Government of Tamil Nadu have taken the policy decision, **to allocate 50% of the Super Specialty seats (DM / M.Ch.) in Government Medical Colleges to in-service candidates of Tamil Nadu and to allocate remaining 50% seats to the Government of India / Director General of Health Services from the academic year 2020-21 and to fill up these seats based on the marks obtained in the NEET - Super Speciality.** Now, it has been decided to implement the above policy decision of this Government from the academic year 2021-22 for admission to Super Speciality (D.M/ M.Ch) Courses.

----- oOo -----

7) COMPULSORY ROTATING MEDICAL INTERNSHIP (CRMI)

The National Medical Commission (Compulsory Rotating Medical Internship) Regulations, 2021, published on 18.11.2021, prescribed only 7.5% of intake capacity for Foreign Medical Graduates to pursue Compulsory Rotating Medical Internship (CRMI) training in Government Medical Colleges. A number of Foreign Medical Graduates seek for Compulsory Rotating Medical Internship (CRMI) in Tamil Nadu Government Medical Colleges. Adequate infrastructure facilities are also available in Tamil Nadu for enhancement, it is requested to enhance the intake capacity from 7.5% to 20% every year, so as to enable the Foreign Medical Graduates to pursue and complete their internship within two years time framed in the National Medical Commission (CRMI) Regulations, 2021.

In National Medical Commission (CRMI) Regulations, 2021 above, it has been stated that the Hospitals attached to the Medical Colleges should alone be allowed to conduct CRMI training. There is also demand from Foreign Medical Graduates seeking CRMI training in 7 (seven) District Headquarters Hospitals of this State (which are not attached to Medical Colleges) and which were earlier permitted by the State Government to conduct the CRMI to Foreign Medical Graduates.

Hence, it is requested that necessary amendment may be issued to the regulations to include District Headquarters Hospitals and increase intake capacity in respect of Medical College Hospitals to 20% from 7.5%.

----- oOo -----

8) ADDITIONAL FUNDING UNDER NATIONAL HEALTH MISSION

The Government of India is releasing funds to National Health Mission, Tamil Nadu to carry out the activities proposed under Programme Implementation Plan which is approved under Record of Proceedings (ROP) every year.

The last five years releases are given below;

Year	Total Resource Envelope	% of Increase
2018-19	2034.94	8
2019-20	2214.73	9
2020-21	2435.68	10
2021-22	2555.33	5

Tamil Nadu has also initiated various new activities in Primary and Secondary Care to achieve Sustainable Development Goals. At District level there is a need to create 19 District Headquarter Hospital to meet out the secondary care health requirements. Hence we request for an increase of 20% in National Health Mission central allocation.

Within the population and distance norms considering the huge population disparities among Blocks adequate Primary Health Centres and adequate Community Health Centres may be considered in the annual sanctions.

----- oOo -----

9) RESERVATION OF SEATS FOR SERVICE CANDIDATES IN THE STATE GOVERNMENT QUOTA FOR THE DM / MCH COURSES

Regarding 50% Reservation of seats for service candidates in the State Government quota for Post Graduate courses such as MD/MS/MDS and DM/MCh, the Government have issued orders for the reservation of 50% of total available seats in respect of MD/MS courses. In respect of super speciality courses DM / MCh, the said Government Order was upheld by the High Court of Madras, but the same was challenged before the Supreme Court of India. The Government of India should ensure the service quota reservation in the DM/M.Ch courses also during the counseling as failure of such a reservation policy subject to other Rules and Regulations have led to erosion of the super specialist care in the State Government run hospitals and gradually is also impacting the recognition of the seats as once the current qualified persons retire we may not have adequate qualified persons in service to fill the vacancies.

----- oOo -----

10) OBJECTION TO THE DRAFT POST GRADUATE MEDICAL EDUCATION REGULATIONS RECENTLY CIRCULATED FOR PUBLIC OPINION

On this issue Honble Chief Minister of Tamil Nadu has already addressed a detailed letter to Hon'ble Union Health Minister on 31.7.2021 stating the objections of the State to the proposed draft. In this regard, the State Government has already communicated its views stating that the draft regulations intend to undermine the role of the States in Post Graduate Medical Education, since their role in the admission of students under their own State quota is sought to be unilaterally removed.

It is unfortunate that such draft regulations have been formulated without a proper understanding of the current pre-dominant role of State Governments in this domain. The Union Government and the National Medical Council need to appreciate the fact that it is only the States which have heavily invested their own resources to create most of the Post Graduate seats. Considering this, our State has consistently been opposed to such measures aimed at centralization of States' powers.

The proposed step is not only unacceptable but is also in contravention of the provisions in the Main Act, governing the common counselling for the seats at the State level. In this connection, I would like to draw your kind attention to Section 11.2 of the draft Post Graduate Regulations, which attempts to centralize and designate the Directorate General of Health Services, Ministry of Health and Family Welfare, Government of India as the designated authority for counselling for State quota seats. This **section is clearly contrary to the proviso**

in the Section 15 of the Main National Medical Commission Act, 2019, which explicitly mentions that "the designated authority of the State Government shall conduct the common counselling for the seats at the State level".

Further, Section 10.1 in the proposed draft Regulations and the sub-clauses under it are again a brazen attempt towards giving effect to the yet to be introduced licentiate examination for enrolment in medical registers and making it serve as a NEET for admission to PG Courses. Tamil Nadu has consistently been against the proposed National Exit test as well as the proposal to make it as the basis of admissions to Post Graduate seats.

Thus, the draft regulations are totally against the consistent and principled stand of our State Government. We have been admitting the candidates who apply for admissions under the State quota Post Graduate seats in a transparent manner by following our reservation policy, without any issues so far.

Tamil Nadu Government also has a robust mechanism of incentivizing medical service in rural, remote and difficult areas for the in-service candidates, within the provisions of the existing regulations and this has been the bedrock of our well-functioning public health system. Thus, the draft regulations, if implemented, will grossly harm our State.

Hence, any hasty attempts, as brought out in the draft regulations, aimed at changing the present methodology of counselling for the State quota seats against the provision of the Main WIC Act and the proposal to make the National Exit test as the basis of Post Graduate admissions in future, should be immediately stopped.

The State Government is of the firm view that the status-quo should be maintained on the admissions for State quota Post Graduate admissions seats. I once again strongly reiterate the opposition of the state to the draft Post Graduate Medical Education Regulations, 2021, which hit at the very root of the federalism and request Government of India and National Medical Council to drop the proposed draft regulations.

----- oOo -----

11) PROPOSAL FOR ESTABLISHMENT OF DISTRICT HEADQUARTERS HOSPITALS IN 19 DISTRICTS ACROSS TAMIL NADU

As a part of the National Mission to increase the Medical College hospitals across the country, Government of India has sanctioned establishment of 11 new Medical College Hospitals in Tamil Nadu. In these districts, the existing Government District Headquarters Hospitals were converted into Government Medical College Hospitals to expand tertiary care services to districts.

In addition to the above, District Headquarters Hospitals are not available in 8 other districts, out of which 6 districts were newly formed. Hence, it is proposed to establish 19 new District Headquarters Hospitals in the State, since every district is expected to have a district hospital, as they are responsible for providing comprehensive secondary health care services to the people in the district and being responsive and sensitive to the needs of people and referring centres.

It has been proposed to upgrade Sub-District Hospitals to the District Headquarter Hospitals in the following **19 Districts** with concurrence of State Government:

S. No	District	MYE Population for 2021
1	Ariyalur	8,16,654
2	Chengalpattu	24,76,930
3	Dindigul	23,40,267
4	Kallakurichi	15,05,222
5	Karur	11,57,880
6	Krishnagiri	20,37,970

S. No	District	MYE Population for 2021
7	Mayilduthurai	9,91,285
8	Nagapattinam	7,58,985
9	Namakkal	18,77,902
10	Pudukottai	17,50,730
11	Ramanathapuram	14,48,814
12	The Nilgiris	8,02,606
13	Thiruvallur	25,61,567
14	Tirunelveli	17,93,720
15	Tirupathur	12,81,511
16	Tiruppur	27,06,683
17	Vellore	16,92,968
18	Villupuram	22,33,383
19	Virudhunagar	21,08,383

The District Headquarters Hospitals need to be upgraded keeping in view the resources available with respect to functional requirements and minimum acceptable standards such as building, manpower, instruments and equipment, drugs and other facilities etc. These institutions are expected to provide Essential (Minimum Assured Services) and Desirable (which we should aspire to achieve) services.

Besides the basic specialty services, due importance will be given to Newborn Care, Psychiatric services, Physical Medicine and Rehabilitation services, Accident and Trauma Services, Dialysis services, Anti-retroviral therapy and Patient Safety and Infection control norms. The District Headquarters hospital will also be ready for epidemic and disaster management all the times. In addition, these facilities will provide skill based trainings for different levels of health care workers.

Based on the IPHS guidelines, the size of a district hospital is a function of the hospital bed requirement, which in turn is a function of the size of the population it serves. Hence, it has been decided that the selected Sub-District Hospitals shall be upgraded to a 500 bedded District Headquarters Hospital. The proposed cost for the upgradation for one institution is given in the table below:

S. No	Particulars	Total Amount Proposed (Rs. in crore)
1.	Infrastructure	35.00
2.	Equipment	10.00
3.	Human Resources	5.00
Total Cost for 1 Institution		50.00
Grand Total for 19 Institutions		950.00

National Health Mission–Tamil Nadu, is strongly committed to strengthening of the health sector by supporting the comprehensive secondary health care (specialist and referral services) to the community. Hence, it is requested that the proposal submitted for **Rs.950.00 crore** may be approved to provide effective, affordable health care services (curative including specialist services, preventive and promotive) covering both urban population and the rural population in the district.

The detailed estimate of the proposed District Headquarters Hospitals will be submitted later as per fulfilling the IPHS Standards and gap analysis.

----- oOo -----