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राष्ट्रीयआयुर्विज्ञानआयोग  
NATIONAL MEDICAL COMMISSION  
आचार और चिकित्सा पंजीकरण बोर्ड  
ETHICS AND MEDICAL REGISTRATION BOARD

No NMC/EMRB/A-11011/05/2021-Ethics 1019946

Dated the 1<sup>st</sup> June, 2022

ORDER

The present Appeal has been preferred by the appellant Dr. K. Subrahmanya Bhat against the order passed by the Travancore -Cochin Council of Modern Medicine dated 17.05.2021. The Travancore -Cochin Council of Modern Medicine vide its order dated 17.05.2021 had resolved to remove the name of the appellant from the register of practicing medical professionals for a period of two (2) months. The present appeal has been preferred against this impugned order of Travancore -Cochin Council of Modern Medical Council under Section 30 of the National Medical Commission Act, 2019.

2. As per the Order No. A2-9496/2019/MC/Comp. dated: 17/05/2021 of Travancore - Cochin Council of Modern Medicine the Case was initiated at behest of a complaint from Dr. T.V Padmanabhan, Chairman of Anti Quackery Committee IMA, Kerala State Branch, who filed a complaint against Dr. K. Subrahmanya Bhat, for practicing as consultant Sonologist without PG Qualification on strength of PCPNDT Act and violating the direction of Travancore-Cochin Medical Council not to use title "Consultant Sonologist".

3. Dr. K. Subrahmanya Bhat had earlier approached Hon'ble Court of Kerala in Writ Petition (C) 30366 of 2008, which was disposed of by Hon'ble Kerala High Court with direction to Dr. K. Subrahmanya Bhat to approach appellate authority ie. Medical Council of India.

No appeal had been filed by Dr. K. Subrahmanya Bhat to erstwhile Medical Council of India, against the State Medical Council Order dated 30/08/2008, hence the order dated 30.8.2008 passed by Travancore -Cochin Council of Modern Medicine became absolute and binding on Dr. K. Subrahmanya Bhat.

4. Another Writ Petition (C) No.11413 of 2021 was filed by Dr. Subrahmanya Bhat before the Hon'ble High Court of Kerala. The Hon'ble Court was pleased to dispose of the Writ Petition by Judgement dated 31.05.2021 with the following directions:

"In case the petitioner submits an appeal before 2<sup>nd</sup> respondent, online within a week from the date of receipt of the judgement, the appeal shall be considered, at least for the purpose of

interim orders, within ten days thereafter. The petitioner shall be put on notice and heard within ten days, as directed above. The publication and implementation of Ext. 26 impugned order shall be kept in abeyance for a period of three weeks to enable the filing of the appeal and the consideration of the interim relief by the 2<sup>nd</sup> respondent. With the above directions, the writ petition is disposed of."

5. PCPNDT Act. specifically provides the scope and application of enactment in its preamble which read as follows

*"An act to provide for the prohibition of sex selection, before or after conception and regulation of pre natal diagnostic techniques for the purpose of detecting genetic abnormalities or metabolic disorders or chromosomal abnormalities or certain congenital mal formation or sex linked disorders and for the prevention of their misuse of sex determination leading to female foeticide, and, for matters connected therewith or incidental thereto."*

Sec.2 (p) PCPNDT Act. define Sonologist

*"Sonologist or imaging specialist" means a person who possess any one of the medical qualifications recognized under the Indian Medical Council Act, 1956 or who possesses a Postgraduate qualification in Ultrasonography or imaging techniques or Radiology".*

In this present case Dr. K. Subrahmanya Bhat is only Certificate holder after attending training under PCPNDT Act. which he can use for the purpose of pre conception and pre natural diagnostic purposes stipulated by statute.

Further with regard to general practice of sonology person has to acquire one of the qualification recognised under the Indian Medical Council, 1956, and it has to be registered in the respective State Medical Council, also.

6. The Indian Radiological and Imaging Association, Kerala, affiliated to Central Association has been 3rd party to the proceedings before Travancore and Cochin Medical Council. IRIA stating that During perusal of MBBS course - basics of many subjects like Medicine, Surgery, Gynaecology & Obstetrics, Dermatology, ENT, Ophthalmology etc, but Radiology and Anaesthesia are elective subjects. Only MBBS qualified personal was / is not allowed to give anaesthesia or perform ultrasound, because these are vast subjects and their syllabus and curriculum cannot be completed during the duration of MBBS course.

- Individual with MBBS degree with two years of diploma in Medical Radio-diagnosis or 3 years MD - Radio- diagnosis, can be registered with State Medical Council and practice as Radiologist.

Dr. K. Subrahmanya Bhat (with MBBS degree) has been practising as Consultant Sonologist since 2004. Violating PC & PNDT Act Dr. K. Subrahmanya Bhat, has been practising as General Sonologist (instead of doing USG study in OBG cases only), further Dr. K. Subrahmanya Bhat is not displaying his medical degree in his reports to cover up the fact that he is just an MBBS holder and not a Post Graduate.

Order dated 30.08.2008 of Travancore -Cochin Council of Modern Medicine did not restrict Dr. K. Subrahmanya Bhat from practicing as General Sonologist, after his de-registration period and they also failed to direct the authority under PCPNDT (DMOH) to cancel the registration issued to the Genetics Clinic of Dr. K. Subrahmanya Bhat.

7. Indian Society of Clinical Sonologist submitted its representation which states, all members of ISOCS are enrolled on State Medical Register and are competent to practice in the field of General Medicine and Sonologist as per provision of IMC Act, MSG and PCPNDT Act.

Prenatal Diagnostic Technical (prohibition of Sex Selection) Act 1994, (Preamble) Section

2(m) "*registered medical practitioner*" means a medical practitioner who possess any recognised medical qualification as defined in clause (h) of section 22 of Indian Medical Council Act, 1956 (102 of 1956) and whose name has been entered in State Medical Register".

In the year 1996, the Rules were framed under the said PNDT Act. Following which, Rule 3 of the PNDT Rules, as it stood then, prescribed minimum qualification of the employees or medical practitioners and the minimum equipment and place for a Genetic counselling centre/laboratory/clinic as per Schedules I, II and III to the said PNDT Rules. Schedule III under Rule 3(1) prescribed requirements for registration of a genetic clinic and read as below:

*"REQUIREMENTS FOR REGISTRATION OF A GENETIC CLINIC.....*

1 Voluntary Health Assn. of Punjab v. Union of India, (2016) 10 SCC 265

#### C. EMPLOYEES:

*(1) A gynaecologist with adequate experience in pre-natal diagnostic procedures (should have performed at least 20 procedures in supervision of a gynaecologist experienced in the procedure, which is going to be carried out, for example chorionic villi biopsy, amniocentesis, cordocentesis and others indicated at B above)*

*(2) A Radiologist or Registered Medical Practitioner for carrying out ultrasonography. The required experience shall 100 cases under supervision of a similarly qualified person experienced in these techniques."*

#### 8. Amendments in 2001 and 2003

The PNDT Act and Rules were amended in 2001 vide Amendment Act, 2001 (32 of 2001) with effect from 03.09.2001 and in 2003 vide Amendment Act, 2002 (14 of 2003) with effect from 14.02.2003.

Section 2(p) was inserted in the PNDT Act which defined a sonologist or imaging specialist w.e.f 14.02.2003. Section 2(p) reads as below:

*"2(p) "sonologist or imaging specialist" means a person who possesses any one of the medical qualifications recognised under the Indian medical Council Act, 1956 (105 of 1956) or who possesses a post-graduate qualification in ultrasonography or imaging techniques or radiology;"*

It is noteworthy to mention that section 2(p) uses the word 'OR'. That in terms of the aforesaid definition, a person possessing any one of the medical qualifications recognized under the Indian Medical Council Act, 1956 is entitled to practice Ultrasound.

9. Further, in 2003, the 1996 Rules were first amended, whereby Rule 3(3)(1)(b) was amended to read as under:

3. (1) Any person having adequate space and being or employing...  
(b) a Sonologist, Imaging Specialist, Radiologist or Registered Medical Practitioner having Post Graduate degree or diploma or six months training or one year experience in sonography or image scanning, or..."

In 2014 - 6 months training rules 2014 (term Radiologist not there in (rule3(3)(1)(b)

*(b) a Sonologist, Imaging Specialist or Registered Medical Practitioner having Post Graduate degree or diploma or six months training duly imparted in the manner prescribed in the "Pre-conception and Pre-natal Diagnostics Techniques (Prohibition of Sex Selection) (Six months Training) Rules, 2014..*

Therefore, the interpretation that only doctor with postgraduate degrees in USG and imaging technique or Radiology were competent to install, use, operate and report on diagnosis with ultrasound machine in draconian and suffer from vices. It is of relevance to note that in absence of any bar under PCPNDT Act or any other law / rule/ regulations to using / operating ultrasound machine, the definition under 2(p) could not be restricted to Sonologist / Radiologist having Post Graduate Degree and also included the MBBS Doctors.

#### 10. 2011-WP before Delhi High Court

In 2011, the aforesaid Rule 3(3)(1)(b) of the PNDT Rules as amended in 2003 [S.No.3 above] and certain other provisions of the PNDT Act and Rules came to be challenged before the Hon'ble High Court Delhi in W.P. (C) 6969/2011.

#### 11. 2014 Notification

In 2014, during the pendency of the above writ petition, the PNDT Rules were further amended vide Notification dated 09.01.2014<sup>1</sup> (hereinafter referred to as "the 2014 Notification").

Rule 3(3)(1)(b) as amended in 2014 [S.No.3 above] now prescribed six-month training to be imparted in terms of the Pre-conception and Pre-natal Diagnostic Techniques (Prohibition of Sex Selection) (Six Months Training Rules, 2014”).

Rule 6 of the above mentioned Six Months Training Rules, 2014 prescribes that any registered medical practitioner shall be eligible for undertaking the said training.

Rule 6 sub-rule (2) further provides that “existing registered medical practitioners” are exempted from undertaking the said six-month training provided they are able to qualify the competency-based assessment, failing which they would also be required to undertake the training, and reads as under:

*“6. Eligibility for training. – (1) any registered medical practitioner shall be eligible for undertaking the said six months training.*

*(2) The existing registered medical practitioners, who are conducting ultrasound procedures in a Genetic Clinic or Ultrasound Clinic or Imaging Centre on the basis of one year experience or six months training are exempted from undertaking the said training provided they are able to qualify the competency based assessment specified in Schedule II and in case of failure to clear the said competency based exam, they shall be required to undertake the complete six months training, as provided under these rules, for the purpose of renewal of registrations.”*

Rule 9 stipulates that the changed criteria is to be made prospective and reads as under:

*“9. Changed criteria to be made prospective. – These rules shall come into force with immediate effect in case of new registrations. However, all registered medical practitioners employed in a Genetic Clinic or Ultrasound Clinic or Imaging Centre on the basis of one year experience or six months training and failed to qualify the competency-based exam as specified in Schedule II shall have to apply and clear six months training on or before 1<sup>st</sup> January 2017.”*

It is pertinent to state that the aforesaid 2014 Notification did not further amend the definition of “sonologist” under Section 2(p) of the PNDT Act which was previously inserted in 2003 vide Amendment Act, 2002 (14 of 2003) with effect from 14.02.2003.

The 2014 rules were challenged in Writ Petition before the Hon’ble High Court of Delhi in W.P. (C) 2421/2014 and W.P. (C) 3184/2014 was also filed before the High Court.

## **12. Judgment dated 17.02.2016**

The Hon’ble Delhi Court vide its impugned judgment dated 17.02.2016 in WP (C) Nos. 6968/2011, 2721/2014 and 3184/2014 was pleased to hold as under;

*“(i) that Section 2(p) of the PNDT act defining a Sonologist or Imaging Specialist, is bad to the extent it includes persons possessing a postgraduate qualification in ultrasonography or imaging techniques-because there is no such qualification recognised by MCI and PNDT Act does not empower the statutory bodies constituted thereunder or the Central government to devise and coin new qualification.*

(vi) Rule 3(3)(1)(b) of the PNDT Rules (as it stands after the amendment with effect from 9<sup>th</sup> January 2014) is ultra vires the PNDT Act to the extent it requires a person desirous of setting up a Genetic Clinic/Ultrasound Clinic/Imaging Centre to undergo six months training imparted in the manner prescribed in the Six Months Training Rules."

**13. SLPS Filed**

SLP NO. 11046 of 2016 has been filed by INDIAN RADIOLOGICAL & IMAGING (IRIA) challenging the judgement dated 17.02.2016 passed in Writ Petition (Civil) Nos. 6968/2011, 2721/2014 and 3184/2015.

Indian Society of Clinical Sonologists (ISOCS) which is a Registered Society formed on June 30<sup>th</sup> 2016, and registered under the Tamil Nadu Societies Registration Act, 1975 ( Tamil Nadu Act 27 of 1975) on 11<sup>th</sup> August 2016. ISOCS is impleaded as Respondent No. 4 in SLP © No. 11046 of 2016 and has *inter alia* filed Counter Affidavit and Written Submissions before the Hon'ble Supreme Court.

**14. Stay Order dated 14.03.2018**

Vide its Stay Order dated 14.03.2018, The Hon'ble Supreme Court was pleased to direct interim stay on the operation of the impugned Judgment dated 17.02.2016 as passed by the Hon'ble High Court of Delhi.

It is pertinent that for a period of almost 2 years i.e., 2016-2018, there was no requirement for competence assessment/6-month training because of Rule 3(3)(1)(b) being struck down by the Hon'ble Delhi Court in its impugned judgment and no stay being granted by the Hon'ble Supreme Court.

As a consequence of the Stay Order dated 14.03.2018, passed by the Hon'ble Supreme Court, the training requirement/competence assessment under rule 3(3)(1)(b) which was struck down as *ultra vires* and non-est by the Delhi High Court stands revived.

The Hon'ble Supreme Court of India, in Para 10 of the interim order dealt with the legislative competency of Indian Medical Council Act, 1956 and PCPNDT Act.

A complete reading of the said order and the PCPNDT Act and Rules framed thereunder will make it clear that the practice of ultrasound falls within the domain of PCPNDT Act and is to be regulated by the appropriate authority under the Act, making it clear that IMC has no role in it.

A MBBS doctor qualified as required under the PCPNDT Act and Rules framed thereunder falls within the definition of a Sonologist. Therefore, it is clear on meticulous interpretation by the Supreme Court of the 2014 rules, that the same are not in violation/ultra-Vires the Act, and there is no conflict between the act & rules made there under.

**15. Amendment to Six-Months Training Rules, 2020.**

While the final decision of the Supreme Court is pending, the PNDT (Six Month Training) Rules 2014, further stood amended in the year 2020 vide notification-dated 26.06.2020.

Pursuant to PNDT (Six Month Training) Amendment Rules, 2020 coming into force, all state governments/Union Territories are mandated to complete the Competency Based Assessment Examination on or before June 2022, thereby providing a 2-year window to conduct CBET, allowing existing registered medical practitioners who are conducting ultrasound procedures in a Genetic Clinic or Ultrasound clinic or Imaging Centre to clear CPT within 3 attempts, failing which the registered medical practitioner must undergo compulsory six months training.

In this light, various State governments are taking efforts in this direction to conduct CBET exams, for existing medical practitioners registered for ultrasonography under PC & PNDT Act, 1994 and the PC & PNDT Six Months Training Rules, 2014.

#### **Interim order dated 07.02.2020**

The Hon'ble Supreme Court in *Anil Wasti & Other vs. State of Chhattisgarh & Others*, SLP © Nos. 3058/2020 passed an interim order dated 07.02.2020 that no penal action will be taken against a doctor who has put into practice for not less than 15 years in case he does not take the proposed examination.

The same order further mandates clearing of competency-based exam as and when conducted. As such the said interim order stands to the benefit of all MBBS doctors who are already registered or seeking renewal under the PC-PNDT Act.

#### **16. Role of Medical Council of India (MCI) in Framing six months training rules and its curriculum**

MCI was actively participated in Central Supervisory Board Meetings (CSB) and had a significant role in framing Six Months Training Rules 2014 in present form.

It is of relevance to note that in the 17th CSB Meeting; Agenda Number 4, dated-04/06/2011 it was decided not to amend section 2(p) of the Act in isolation and retain Rule 3(3)(1)b in its present form in view of the shortage of doctors with postgraduate qualifications on the one hand and the growing need of Ultrasound services on the other. It was however decided that the criteria with regard to educational qualification for eligibility for training, length and content of training, accreditation of training institutions as well as experience, valid under the Rules be developed by MCI and incorporated in the amendment.

Further bare reading of the Minutes of the Meeting of the Board of Governors held on 9/08/2011 goes to reveal that the Board of Governors considered the matter regarding incorporation in amendments to the PC & PNDT Act, 1994 (as amended in 2003) and perused the DO letter dt. 26.7.2011 by Smt. Anuradha Gupta, IAS, Joint Secretary, Ministry of Health & F.W., and the minutes of the 17th meeting of the Central Supervisory Board (CSB) .....given the shortage of doctors with post-graduate

qualifications on the one hand and the growing need of ultrasound services on the other, amendments are warranted in the PC & PNDT Act 1994, (as amended in 2003).

In light of the above observations and the decision of the CSB to assign the task of amendment to present, PC & PNDT Act 1994 (as amended in 2003) to the Medical Council of India the Board decided to constitute a Committee under the Chairmanship of Dr. Veena Chaudhary, Director and Professor Radiology, G.B.Pant Hospital, New Delhi for development of criteria with regard to educational qualifications for eligibility for training, length and content of training, accreditation of training institutions as well as experience and their incorporation in the PC & PNDT Act 1994 (as amended in 2003).

The MCI in its Meeting of Board of Governors held on 23-12-2011 discussed and framed the draft of Six Months Training Rules. wherein the Board of Governors considered the matter with regard to incorporation in amendments to the Pre-natal Conception and Pre-natal Diagnostic Techniques (Prohibition of Sex Selection) (PC & PNDT) Act, 1994 (as amended in 2003). There were mainly three reference points suggested by the Hon'ble High Court of Delhi for clarification which were then forwarded to the Medical Council of India through the Government of India for appropriate suggestions to be suitably incorporated in the amendment to the Act and explicated in the PC PNDT rules given as below:

- a. The requirements in terms of qualification, training and experience required to be registered as a "Sonologist" should be incorporated in the PC PNDT Act and further explicated under the PC PNDT rules
- b. The Names of the Institutions state wise which are recognized for that purpose will have to be notified.
- c. The changed criteria must be made not only prospective but sufficient time to be given to enable those seeking registration or renewal to fulfil the changed criteria.

Further, in the 18th CSB Meeting; Agenda Number 4, dated- 14-01-2012, guidelines submitted by MCI were discussed at length and amendment to Rule 3(1)(b) as proposed by Ministry was approved. CSB further decided that a committee consisting of JS(RCH), Dr. Rajeev Yeravadekar and two other members nominated by MCI would re-evaluate the proposed 300-hour syllabus with a view to make it more broad based so as to impart comprehensive skills on Ultrasonography rather than limit the skills to Obs./Gynae only.

Followed by the 19th CSB Meeting; Agenda Number 4, dated- 29-07-2012, the guidelines submitted by the Core-Committee constituted for re-evaluation of the syllabus proposed by MCI, with a view to impart broad based skills in Ultrasonography, were discussed and the board approved the following:

*"Syllabus developed for Six Months Training for the purpose of using Ultrasound machines under the PC-PNDT Act. "*



In 21st CSB Meeting; Agenda Number 4, dated- 23-07-2013, popularly known as "Rules for six months training in ultrasound for MBBS Doctors" wherein the CSB was apprised of the notification of the Rules of Six Months Training in ultrasound for MBBS Doctors. It was informed that the Rules must be notified bilingually. The approved Rules have been sent for Hindi translation to MCI.

Despite the PC-PNDT Act defining who is a "Gynaecologist", "Medical geneticist" and "Paediatrician" it permits only a sonologist or imaging specialist or a registered medical practitioner to perform sonography. Therefore, the intention of the legislature can be inferred from the above, wherein a MBBS doctor who possess qualification recognised under IMC Act, 1956 is placed on the same pedestal as a sonologist or imaging specialist possessing postgraduate qualification in ultrasonography or imaging techniques or radiology.

The term "Sonologist" or "Registered Medical Practitioner" includes Postgraduates of all Branches of Medicine and Surgery as well as Radiology and MBBS Doctors. Therefore, going by the plain interpretation of Section 2(p) of the PC-PNDT Act, a MBBS doctor performing sonography can refer to himself/ herself as a sonologist in terms of the provisions of the PC-PNDT Act and rules.

Moreover, the 2014 notification did not amend the definition of 'sonologist' in the PNDT Act, as provided under Section 2(p) of the PNDT Act, by virtue of which, anyone of the medical qualifications recognised under the IMC Act would suffice a MBBS doctor to practice ultrasonography and can undergo the six-month training as prescribed under the Act. Hence, it is understood that a MBBS doctor is qualified to practice ultrasonography provided:

- a. Possess a certificate of registration with the respective state Medical Council or Medical Council of India.
- b. Has qualified for the competency-based examination.
- c. Has undergone compulsory six-months training on failure to clear the competency-based examination within 3 attempts before June 2022.

All the registered Medical Practitioners, authorized by amendment in Rule 3(3) of the PCPNDT Rules of 1996, to carry out the sonography test, shall sign the sonography reports. The digital signatures will not be allowed. Each report will be accompanied by a photocopy or printed copy of the registration certificate of the PCPNDT clinic. <sup>2</sup>Neither the Act nor judgments passed by the courts in India, specify what designation can be used by the registered medical practitioners to sign these reports.

Act does not curtail the use of designation i.e. Clinical / Consultant/ Imaging specialist for those who qualify to practice USG under the provision of the Act.

Based on the minutes of the meeting of the Board of Governors, held on 23/12/2011, it is evident that MCI has defined the requirements for MBBS doctors to be registered as Sonologist under PCPNDT act to perform Ultrasound. The said meeting forms the basis for the enactment of the '2014 training rules.

Per contra, the TCMC has failed to appreciate that before the Appellant could prefer an appeal before the appellant body i.e. Medical Council of India, the PCPNDT rules were further amended in 2014 introducing additional qualification required for a medical practitioner to act as a Sonologist. Therefore, the position of law was changed significantly in 2014. In this light the 2008 directions is a dead letter having no bearing on law, stands absolute and nullified.

**17. It was observed by Ethics & Medical and Registration Board that**

1. Dr. K. Subrahmanya Bhat having commenced practice, joined special qualification and training in the branch of Sonography / Imaging screening.
2. He has experience, training in OBG and Radiology as Sonologist.
3. Since IMA was convinced that complainant was only attempting to settle scores with the petitioner for personal reasons, he was removed from the said committee. IMA issued letter dated 20/09/2019 to the first respondent i.e. State Medical Council, stating that they do not want to pursue the complaint against the petitioner and letter 22/04/2019.
  - Proceeding vitiated by Bias and prejudice. The Ethics committee included Dr. K Mohanan K, Radiologist and former president of its All India Association (IRIA).

**Undertaking submitted by Dr. K.Subrahmanya Bhat at Ethics Medical and Registration Board.**

*I, Dr. K. Subramamanya Bhat, registered with Travancore and Cochin Medical Council with Registration No.36760, do hereby undertake that I will practice as a "sonologist" as per the procedure set by the Pre-Conception and Pre-Natal Diagnostics (PC&PNDT) Act, 1994 on the strength of the Registration No. 44/2008(earlier Regn. No. 44/2002) under the PC&PNDT Act. I also undertake not to conduct any other ultrasound procedure which is not permissible in law, including under the PC&PNDT Act. I undertake not to use the title "consultant" in any way or form before "sonologist", hence, not use the term "consultant sonologist".*

The case was in Kerala High Court from 2008 to 2013 and it is alleged that no action was taken from 2013 to 2019. The complaint against Dr. K. Subrahmanya Bhat was filed again in 2019 and State Medical Council took decision based on the complaint.

## Order

After going through all the available records of the case and documents as mentioned above we are of the opinion that:

1. Dr. K. Subrahmanya Bhat, is warned not to overlook the directions from State Medical Council which is a statutory body.
  2. Dr. K. Subrahmanya Bhat will not use word "Consultant" as the word has a connotation of specialist in the area. Specialist means having a qualification recognised by NMC Act 2019, 35(1), as below;  
*35. (1) The medical qualification granted by any University or medical institution in India shall be listed and maintained by the Under Graduate Medical Education Board or the Post-Graduate Medical Education Board, as the case may be, in such manner as may be specified by the regulations and such medical qualification shall be a recognised medical qualification for the purposes of this Act*
  3. Dr. K. Subrahmanya Bhat will not practice ultrasonography or any other procedures beyond the scope of PCPNDT Act. (Meaning nothing beyond what is taught and learnt under - rules 6 month training of PCPNDT Act)
  4. Dr. K. Subrahmanya Bhat will make sure that patients know that he is MBBS with special training and possess certificate under PCPNDT Act to practice ultrasonography accordingly.
  5. The appeal stands disposed off.
  6. As per section 30(4) of the National Medical Commission Act, 2019, a medical practitioner or professional who is aggrieved by the decision of the Ethics and Medical Registration Board may prefer an appeal to the National Medical Commission within 60 days of communication of such decision.
18. This issues with the approval of Ethics & Medical Registration Board.

  
(CL Guleria)

Under Secretary, EMRB  
National Medical Commission

Copy to:

1. Dr. K. Subrahmanya Bhat, Shrivari House, Mavungal, Opp. Swami Ramdas Shishumandir, Anandashram P.O., Kangangad, Kasargod
2. Dr. T.V. Padmanabhan, Thekkeveetil, Lakshmi Nagar, Kanhangad, Kasargode-671315
3. The Travancore-Cochin Council of Modern Medicine, Combined Council Building, Red Cross Road, Thiruvananthapuram-695035, Kerala

4. The Director of Medical Education, Government of Kerala, Government Medical college, Thiruvananthapuram
5. Director of Health Services, Govt. of Kerala, Thiruvananthapuram