The recognition of qualifications of refugee healthcare professionals in the European Union A comparison of European practices

GERMANY





According to a WHO report¹, the management of the Covid-19 epidemic in Germany has led to an increase in resignations and work stoppages, which is seriously undermining the healthcare system. In 2021, 35,000 healthcare staff positions were vacant across the country, an increase of 40% in a decade. According to a survey of German hospitals with more than 50 beds, 90% of them described a greater-than-usual shortage of staff. In half of the establishments, work stoppages rose by between 5% and 20% in 2022.

In 2023, **57,200 foreign doctors were practising in Germany**. More than 32,000 of these will come from outside the European Union. In 2021 alone, 9,636 foreign doctors applied for recognition of their foreign qualifications. This made medicine the second most popular profession after nursing (13,773 applications).²

What's more, nursing staff in Germany are more in demand and more important than ever. The German employment agency estimates that by 2025, around 150,000 additional nurses will be needed³. At present, there are already more positions available than qualified people employed.

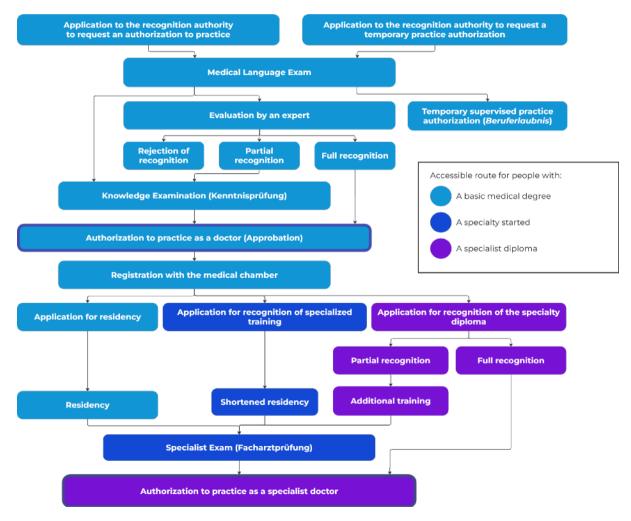


Figure 1: Scheme of the procedure for obtaining a licence to practise in Germany

¹ World Health Organisation, *Health and care workforce in Europe: time to act*, 2023

² Make it Germany, <u>Working as a doctor in Germany</u>, 2024.

³ Bundesagentur für Arbeit, <u>Internationaler Bewerberanzeiger Programm Triple Win - Pflegekräfte</u>, 2022



A) Information and guidance on diploma recognition

An information and guidance platform: Anerkennung in Deutschland

Due to the large number of recognition bodies associated with German decentralisation, the Federal Ministry of Education and Research in Germany has developed **a platform called "Anerkennung in Deutschland**" ("Recognition in Germany"). This portal is aimed at healthcare professionals with foreign qualifications, as well as employers and advisers. It is available in 9 languages in addition to German and English.

The platform also exists in the form of <u>an application</u>. In some countries and for some healthcare professions, it even allows applications for recognition to be submitted directly and digitally.

The portal also features a **personalised search engine** to find the recognition procedure best suited to each case (depending on the country, profession, place of residence, etc.). Information is provided on the recognition body, the cost, the deadlines, the documents required, the language level and the steps to follow. This search engine is only available in German and English

Working and Living in Germany Hotline

This **telephone helpline**, set up by the Federal Office for Migration and Refugees (BAMF) and the Federal Employment Agency (BA), was originally intended for all foreign nationals moving to Germany. It provides four types of advisor, some of whom specialise in the recognition of academic qualifications obtained abroad. They can then refer people to guidance centres.

Information and guidance centres: IQ Network

The IQ network of the *Integration through Qualification* programme offers **advice centres** throughout Germany and in several countries around the world. These centres offer face-to-face meetings in several languages to foreign skilled workers who wish to have their professional or academic qualifications acquired abroad recognised.

An advice centre for skilled workers living abroad: the Central Service for Professional Recognition (ZSBA)

The ZSBA **is an advice centre** that assists qualified professionals in obtaining recognition of their qualifications before they arrive in Germany. In particular, it will provide guidance on the procedure to follow, gather the necessary documents and forward the application to the relevant centre.

B) Prior to recognition

Language level

Before starting the recognition procedure to become a doctor, it is recommended that you have a **B2 level of German**. It is not necessary to provide proof of language qualifications when submitting your application; you simply need to demonstrate your language skills during the procedure.

For nurses, the recommended level is **between B1 and B2**, depending on the Länder. In some Lander, a B2 certificate is sufficient; in others an exam is required.

Preparation aids



German courses are partially or fully funded by the Federal Office for Migration and Refugees (BAMF). They range from level A0 ("<u>integration courses</u>") to level C1 ("<u>German for professional purposes</u>courses ").

B) The pathway to the authorization to practice

The diploma recognition procedure

Application

For doctors and nurses, recognition of qualifications is part of the procedure for obtaining a **licence to practise**. Thus, when applying for this authorisation to practise ("*Approbation*" for doctors or *"Erlaubnis zum Führen der Berufsbezeichnung Pflegefachfrau/Pflegefachmann*" for nurses), the file will also be submitted for recognition of qualifications.

There are almost 1,500 different recognition bodies in Germany. **The recognition authority depends on the profession, but also on the Land** in which the profession is to be practised. For example, it may be the State Office for Health and Social Affairs (as in Berlin), or the National Body for the Recognition of Health Professions of the federal government of Baden-Württemberg.

It is possible to submit the file **as soon as the asylum application is submitted**, or even from abroad.

If **there is insufficient proof**, the competent authorities will require a sworn statement attesting that the training was undertaken in the country of origin. Additional measures such as tests or internships may then be requested.

Recognition method

Although various authorities are responsible for recognition in Germany, **the German ENIC-NARIC**, **known as the Central Office for Education Abroad (ZAB)**, nevertheless makes available to the public <u>anabin</u> database, which lists - albeit not exhaustively - university degrees worldwide, particularly in the health field. The database also details the courses (duration, description) that the training contains and all the requirements linked to the qualifications needed to obtain authorisation to practise in the country of origin. This makes it possible to find out which level of the German system the diploma is equivalent to. This information is obtained thanks to close collaboration with the national information centres of the member countries of the European Union (NARIC), the Council of Europe and UNESCO (ENIC).

The authorities responsible for recognition can **ask ZAB for expert advice** on specific cases or for general information about a country and its education system. The ZAB has even set up an **'expert advice' unit** (Gutachtenstelle für Gesundheitsberufe (GfG)) to assist the authorities responsible for recognising health professions. Expert advice is intended to simplify and standardise procedures. The information corresponds to the current state of research and is continually updated.

Decision

If there are substantial differences between the original qualification and the German diploma that is suitable for practising, the competent authority will define the compensatory measures required to obtain equivalence. These measures are adapted according to the results of diploma recognition and experience. For example, nurses can either take a **knowledge test** (*Kenntnisprüfung*) or follow an **adaptation course** (*Anpassungslehrgang*), which often takes the form of a hospital placement. Doctors who have obtained partial recognition must take a **knowledge test** (*Kenntnisprüfung*). In some Länder, it is possible to waive the full assessment of the academic and professional experience and take the knowledge test directly for people who know that their diploma will not be fully equivalent to the German diploma. In general, it will take at least 14 months from the time the recognition procedure is prepared until approval is obtained.



<u>If the candidate obtains full recognition</u>, all is needed for medical doctors is to pass the medical language examination to obtain authorisation to practise (*Approbation*). Nurses do not pass any further examination. Additional documents must then be submitted (e.g. certificate of good conduct, certificate of good repute, certificate of fitness to practise medicine) to obtain the authorisation to practice. For doctors who obtained their qualifications in a country outside the EU, full recognition can be obtained in almost a third of cases. In 2023, this was the case for 38% of applications for the nursing profession.⁴

<u>If recognition of a foreign qualification is rejected</u>, the law requires the decision to detail the applicant's existing qualifications, skills and operational experience. The aim is to ensure that these qualifications can be taken into account on the labour market for other professions

Medical language exam

For doctors

Once the application for recognition has been submitted, the competent authority will ask the qualified professional to take a C1-level **medical language examination** (the *Fachsprachenprüfung* - FSP). There is no limit to the number of times the examination may be taken.

It is also worth noting that some Länder, such as Saarland, Schleswig-Holstein and Hesse, offer alternatives to the medical language test. One example is the patient communication test (Patientenkommunikationstest). Passing this test gives access to a temporary work permit (*Berufserlaubnis*).

For nurses

There is no need to take a medical language test. In some Lander nurses have to pass a language test at the B2 level (Fachsprachenprüfung). Other Lander are planning to introduce this test.

Complementary measures

For doctors

All doctors must take the **knowledge test** (*Kenntnisprüfung*), which includes a written clinical examination and an oral practical examination. The test can **only** be taken **twice** and is organised three or four times a year. Candidates are informed orally of the result of their examination, even if this is also communicated in writing to the competent authority.

The failure rate is between 40 and 50%. It is advisable to prepare for the test at least 6 months in advance. Paid training courses for the *Kenntnisprüfung* may be **financed by the Employment Agency**. Working with a temporary permit (*Berufserlaubnis*) is also an excellent way of preparing for the test.

There are free preparation courses offered by educational institutions and funded by **the IQ Network** (see Appendix for more details). Applicants have to find the courses and apply for the fundings.

For nurses

Following the results of the equivalence test, those wishing to work as nurses will be offered either an examination (*Kenntnisprüfung*) or an "adaptation course/period" (*Anpassungslehrgang*).

• The knowledge exam is an oral practical and theoretical test taken at the German nursing school after completing a preparatory course. The preparatory course combined with the theoretical and practical examination can last from **6 to 9 months**. The test can **only** be retaken **once (so two attempts are possible).** Fee-paying *Kenntnisprüfung* courses may be **financed by the Employment Agency**. Grants may also be available.

⁴ Böse, Carolin; Schmitz, Nadja; Zorner, Jonathan: Auswertung der amtlichen Statistik zum Anerkennungsgesetz des Bundes für 2023: Ergebnisse des BIBB-Anerkennungsmonitorings. Version 1.0 Bonn, 2024, S. 8.



• For the adaptation course, you will have to do a **placement** in a healthcare establishment. The placement will end with an interview with the tutor, enabling the skills acquired to be attested. The duration of the recognition procedure in this case can go up to more than 16 months, depending on the needs identified in the notice. At the end of the compensation measure, a certificate is issued and must be presented to the competent authority. The competent authority then checks the certificate and, if all the other requirements have been met, grants recognition of the qualifications. The IQ Network also helps people with nursing qualifications to find preparatory courses for the exam and the adaptation course.

It is possible to waive the equivalence assessment and **do the complementary measures directly. This shortens the procedure and reduces administrative costs.** However, this path may **take longer**, as theoretical and professional experience will not be taken into account.

Authorisation to practice

For doctors

Once approval has been obtained, you will need to **register with one of the 17 Land medical associations** (*Landesarztekammer*) in order to practise as an assistant non-specialist doctor. This registration does not cost anything. However, you will have to pay an annual contribution as a member of the association afterwards.

For nurses

Once they have obtained the certificate of equivalence, nurses can immediately start applying for positions in hospitals and other healthcare establishments. They must then register with the German Chamber of Nurses when they are in Nordrhein-Westfalen and Rheinland-Pfalz. There is no need for registration in all other Länder.

D) Recognition of specialisation

With a specialisation diploma

To gain recognition for your specialisation in medicine, you first need to apply for recognition of your medical diploma, enabling you to practise in your own country, and then you must obtain approval and often registration with one of the federal medical associations (*Landesärztekammer*).

Recognition of specialisation must be sought from the *Landesärztekammer* (**regional medical associations**), as they are responsible for all matters relating to specialist training. They analyse the content and duration of the training/internship on an individual basis. Periods of specialist training completed abroad can only be accredited in Germany if they have been carried out for a minimum of 6 months in a duly remunerated post within an establishment authorised to provide specialist medical training. Details of the size of the health establishment and the activities carried out must be provided.

The deadline is generally **4 months**, but this can be extended in specific cases.

If the equivalence of the speciality diploma is confirmed, recognition is granted.

If **significant differences** can be compensated for by relevant professional experience, the Land's medical association will request that further periods of work/training as an assistant doctor be completed. The duration depends on the recognition of previous professional experience obtained abroad. These are not compensatory measures in the same way as the procedure for recognition of the medical diploma (excluding specialisation). After completing further years of work under the supervision of a specialist, an examination at the end of this period confirms that the specialisation has been obtained: the candidate receives a certificate which must be submitted to the competent authority. If all the conditions are met, the professional qualification is recognised.



<u>If there are **substantial differences**</u> between the specialist training received and that received in Germany, and these cannot be compensated for, then the candidate must sit the specialist examination. Generally, if the difference in the length of training to become a specialist is more than one year, a substantial difference is allowed. It may also be possible for a period of hospital work as an assistant doctor to be required before taking the specialist examination.

Without a specialisation diploma

<u>If the specialisation is not recognised or has not been started</u>, the curriculum imposed on nationals who have just obtained their approval must be repeated.

With regard to the resumption of medical **specialisation**, doctors with a licence to practise may **submit their application for specialisation directly to an approved training hospital**. They can then obtain a position as an "intern" in the medical speciality of their choice. They must have obtained recognition of their basic diploma, approval (authorisation to practise) and be registered with one of the federal medical associations (*Landesärztekammer*).

Depending on the specialisation, the specialisation may last **between five and six years**. It is carried out **under the supervision** of specialist doctors authorised to train interns in university hospitals, in other medical institutions authorised to provide specialist training and in doctors' surgeries that are also approved. Some specialised professional experience may be recognised on a case-by-case basis, allowing the length of the internship to be shortened by a few semesters. However, a detailed account of what was achieved during these experiences must be provided.

Following this specialisation, the candidate must sit a **final examination** (the "Facharztprüfung"), consisting of an oral test with a panel of 3 specialists, 2 of whom are in the candidate's specialisation.

E) Accelerated access to work

For doctors

It is possible to practise quickly without having obtained *Approval* by means of a **temporary work permit** (*Berufserlaubnis*). The application for the *Berufserlaubnis* can be made at the same time as the application for *Approval*. Once they have passed the medical language examination, doctors practise under the supervision of an approved person.

This temporary work permit will be valid only in the Land in which it was issued. It is often limited to one type of activity and is valid for **two years**, although extensions are sometimes granted. Practising the profession may then be considered as compensation for recognition.

It is possible to begin the procedure for recognition of qualifications during the asylum application and even from abroad.

For nurses

During the adaptation course, the candidate nurse may work as an assistant under the responsibility of a qualified supervisor. This adaptation period can vary from 4 months to 3 years.

F) Resuming studies

Information and guidance

Each university has an information, advice, guidance and support service to help international students validate their diplomas. Some also offer a guidance service for refugees. The <u>Higher Education Compass</u> website lists all the services for international students in the medical professions.



<u>The studyingermany</u> platform set up by the Federal Ministry of Education and Research provides important information for refugees wishing to resume their studies. However, it is not specific to the health professions.

<u>Uni-assist</u> guides international students through the process of applying to university, assessing international school and university certificates for their equivalence with the German education system and submitting the application directly to the desired university. This site also checks that applicants meet the admission requirements of the various universities, solely from the point of view of documentation; assessment of content and admission to study programmes is carried out by the institutions themselves. Specific information for refugees is also available on the site. Since March 2016, funding provided by BAMF has enabled refugees to apply **free of charge** to up to three higher education institutions per semester via uni-assist.

The 22 "<u>bildungsberatung G-FH</u>" counselling centres advise and support young migrants in their choice of study or career, taking into account the education and training they have previously received abroad and the feasibility of the project in Germany. They also offer grants covering a wide range of costs (course fees, travel expenses, certificates of conformity, certified translations, living expenses and accommodation costs).

Recognition of qualifications

It is officially recognised that beneficiaries of international protection (among others) cannot always provide official documents allowing them to enter university. An <u>adapted procedure</u> that takes into account biography, plausibility and personal aptitudes has therefore been put in place.

For doctors

If you want to study medicine in Germany, you need to apply to the 'state examination office' (*Landesprüfungsamt* - <u>LPA</u>) in your Land for equivalence of studies. In the case of university programmes with a national examination (which is the case for doctors, dentists, veterinary surgeons and pharmacists), the recognition procedure is not carried out at the university. As with the *Approval* procedure, State examination offices may ask the ZAB to assess foreign qualifications.

Generally, the deadline is short (4 months).

As soon as you receive notification of recognition, you must include the equivalence certificate in your application to the university.

For nurses

For nurses, there are no plans to go back to school, as everything happens under the procedure for recognising qualifications to practise.

Resuming studies at an appropriate level

For doctors

In theory, full or partial recognition of completed studies means that students can **resume their studies in the corresponding semester**. Regardless of the status (asylum seekers, refugees) or nationality of the person wishing to return to a medical university course, he or she will be considered a "transfer student". Each year, in programmes with a national examination (as is the case for the medical professions), the **number of places is limited** and set by "the order of the Ministry of Science relating to the determination of admission numbers to study programmes as part of the University allocation procedure". This number of places does not change in the upper years. Admission to a semester in medicine therefore depends on the availability of places at the universities. In practice, **there are very few places available** for students wishing to return to their studies. There are no special procedures or places for refugees.



To enrol at university, you need to be able to prove a **C1 level of German** for the medical professions programmes. However, many universities have opened their language courses free of charge to international students and refugees, enabling these students to reach the level of German required for entry to these universities.

APPENDIX

Fees

Diploma recognition procedure

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The cost of assessing the comparability of "*Gleichwertigkeitsprüfung*" diplomas is **between €100 and €2,800 for doctors** and **between €25 and €600 for nurses**

Assistance is available: for example, **the** "<u>Anerkennungszuschuss</u>" recognition grant awarded by the Research Institute for Vocational Education and Training (f-bb) covers the costs of the procedure up to 3000 euros, including translation, authentication costs and other qualification measures. **The German employment agency** and other local initiatives may also cover the costs of the recognition procedure.

Language exam:

The cost of the medical language test varies **between €300 and €600**, depending on the Länder. There is no subsidy for the cost of the test itself. However, there is assistance for the cost of training courses to prepare for the exam.

The Federal Office for Migration and Refugees (BAMF) subsidises **professional courses to prepare for the** *FSP* for annual incomes of less than €20,000 (otherwise the price is €1,392). If the exam is passed, 50% of the contributions can be reimbursed. The courses given by the FIA (Freiburg International Academy), subject to a certificate of eligibility issued by the BAMF, are also fully subsidised. A recognised B2 certificate is required. Finally, the employment agency can finance *FSP* preparation courses on request. These courses are also subsidised for asylum seekers only if they have a sufficient command of German and are of a nationality for which protection is very often granted (this is the case for Afghanistan, Eritrea, Somalia and Syria).

There are also **online courses** listed on the <u>Imed-Komm.eu</u> website. The aim is to create, test and disseminate modern and innovative language learning material, testing and certification techniques for intercultural professional communication for foreign doctors and healthcare professionals. The material is used in professional language courses (face-to-face courses, hybrid online courses) subsidised by the BAMF.

Finally, the "Integra" project funded by the German Academic Exchange Service (DAAD) subsidises language courses at university on specific subjects such as health.

Knowledge test

The cost of the knowledge test for doctors varies from one Länder to another. For doctors, they **range** from around €400 to €1,100. For nurses, the recognition test costs €950 in Berlin, for example, and between €500 and €600 in Bavaria.

Adjustment period

The costs of the adaptation period for nurses also vary from one Länder to another. For example, costs can be as high as €3,600 in Berlin and between €380 and €3,600 in Bavaria.



Specialisation

The recognition procedure for a general practitioner costs **between €50 and €1,500**, depending on the Länder.

Resuming your studies

Fees for credit recognition range from around forty to one hundred euros.

Content of skills tests and courses

Language exam:

This examination covers **medical terminology**, but also the **ability to explain these medical terms in a language that is appropriate for the patient**. The examination depends on the state you are in. It always contains a written and an oral part. Generally, there is a conversation with the patient, a written description of the diagnosis identified in the discussion, a discussion with other doctors and a test of the translation of medical vocabulary.

Knowledge test:

This test covers internal medicine and surgery, with questions on additional aspects of emergency medicine, imaging procedures, clinical pharmacology, radiation protection and legal issues relating to the practice of the medical profession. In addition, if significant differences have been identified between the candidate's training and medical training in Germany, the competent authority may determine, prior to the examination, that another subject or discipline be assessed.

This knowledge test takes the form of a **clinical examination and an oral practical examination** with patient presentation. As a general rule, the examination takes place in a university clinic or in a hospital commissioned for this purpose.

- During the **clinical examination**, which lasts approximately 60 minutes, the candidate must examine a patient and then write a medical report on the diagnosis, prognosis and treatment plan.
- After the clinical examination, on the same day or a few days later, the candidate takes **the practical oral examination**. This lasts between 60 and 90 minutes and involves questions on a variety of topics (internal medicine, surgery, emergency medicine, clinical pharmacology / pharmacotherapy, imaging procedures, radiation protection or legal issues in medical practice).

IQ Network

The "Integration through Qualification (IQ)" programme, funded by the Federal Ministry of Labour and Social Affairs (BMAS) and the European Union via the European Social Fund Plus, is managed by the German Federal Office for Migration and Refugees (BAMF). Funding of €210 million for around 270 sub-projects across the country is available under the 2023-2025 funding cycle. Since 2015, this network has focused on compensatory measures under the Recognition Act. The aim is to ensure that, through appropriate training, professional qualifications acquired outside Germany lead, as far as possible, to a corresponding job.

Training programmes for doctors have been set up in several regions. For example, the **IQmed programme** (Western Pomerania) prepares foreign doctors for the knowledge test they need to pass in order to practise in Germany. The training includes specialist and practical seminars, case discussions, lectures on healthcare, intercultural seminars and issues relating to liability under the law. The training is online, but also includes practical placements in hospitals.

The programme also helps find and fund the training needed to meet the requirements of the compensatory measures prescribed following the partial recognition of qualifications.

Example of Galina Batt:

JRS France – 12 Rue d'Assas 75006 PARIS – 01 44 39 48 19 – www.jrsfrance.org



Galina came to Germany from Russia. In Russia, she had worked as a medical assistant ("feldsher"). In Germany, this job is an intermediary profession between a nurse and an emergency doctor. Galina Batt applied for recognition of her training. Following the prescription of special compensatory measures, the IQ Network enabled her to find training in hospital at the same time as training at the Louise von Marillac School of Nursing in Cologne. She received financial support <u>from the IQ network</u>.