

*Country*  
**Country's Response**

*to draft  
staff analysis*



SENT BY FAX TRANSMISSION

August 24, 1999

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Dear Dr. Kershenstein

Thank you for your letter of August 11, 1999.

On June 30, 1999 we sent material regarding the reevaluation process of medical schools in Israel, as part of the intention of Israel to seek reconsideration of its noncompatibility status at the September 1999 meeting of the National Committee of Foreign Medical Education and Accreditation.

We are now submitting information regarding those "issues for further examination" identified in the Department of Education staff report, and are preparing to request reconsideration at the September 1999 meeting.

We would like, however to address first of all the 2<sup>nd</sup> reservation of the staff's "Summary of Findings" (p. 2 of the analysis). The staff report indicated that "Israel will not conduct its first site visit until January 2000, and the last of its four scheduled site visits until July 2001. For this reason, it is difficult to make determination about Israel's new reevaluation system until these visits are concluded and the processes for reevaluation and decision-making are completed for the first time."

However, we understood from an email from Ms. Bonnie LeBold of May 25, 1999 that "It is not necessary for a Re-accreditation Committee review to have taken



place before June 30 in order for the NCFMEA to reconsider its decision regarding Israel at the September meeting."

There seems to be a discrepancy between these two statements and we would appreciate clarification.

Further to our correspondence, Israel now operates a reevaluation system. Moreover, it is well known among American medical educators that medical studies in Israel are of high quality, and that the schools of medicine in Israel are all veteran medical schools most of whose Faculty trained in the U.S.. Israeli graduates are recognized for their expertise in medical and academic institutions in the U.S. and around the world. We understood from Ms. LeBold's email of 25 May that the NCFMEA's decision not to insist that reaccreditation visits take place to approval of the process is consistent with the known quality of the Israeli medical schools.

Attached is the information regarding the deficiencies identified in the Department of Education staff report.

We shall be grateful if you would pass on this information and our request to NCFMEA in preparation for its next meeting on September 15<sup>th</sup>. Please let us know if you require any other material or clarification.

Very Truly Yours,  
*Naama Shaked*  
Naama Shaked  
Assistant to the Secretary  
Council for Higher Education of Israel

cc: Mr. Naftali Weitman, Secretary, Council for Higher Education of Israel  
Ms. Bonnie LeBold, Executive Director, NCFMEA



### Accrediting body

The Council for Higher Education (CHE) is the statutory body in Israel with sole responsibility for accreditation of institutions of higher education in Israel, and it operates within the framework of the Council for Higher Education Law, 1958 (Exhibit A). The Council also authorizes accredited institutions to open academic units in all fields, including medicine, and authorizes them to grant academic degrees. The opening of a new program within any academic existing unit requires authorization from the Council to grant academic degrees.

Article 9 of this Law states that "The Council may accredit a particular institution as an institution of higher education on the basis of rules prescribed by it for the accreditation of institutions of higher education, or for types of them, in addition to the requirement of an appropriate scientific standard (such an institution being hereinafter referred to as an "accredited institution"); but those rules shall not limit the freedom of opinion and conscience". According to article 21A(a) of this Law "No person shall open or maintain or advertise the opening or maintenance of an institution not recognized under section 9 which awards or promises to award an academic degree unless such institution has been granted a permit by the Council (hereinafter referred to as a "permit"). Article 23a of this Law states that "The Council may empower an accredited institution, on the basis of rules prescribed by it for the empowerment of accredited institutions for the purposes of this section, to confer a recognized degree upon a particular person, or to confer recognized degrees generally, and it may prescribe rules concerning State examinations to be held as a condition for the conferment of a particular recognized degree by a particular accredited institution."

Hence, every accredited university that wishes to open a School of Medicine must gain the accreditation and the authorization of the CHE.



In Israel there are four schools of medicine, all of which are part of not-for-profit universities. These schools have been in existence for many years, and the universities of which they are part were both accredited by the Council and authorized to grant academic degrees in medicine.

All four schools are legally authorized by the CHE to provide medical education in Israel, and the Committee for Re-Evaluation of Medical Schools is not requested to examine this aspect.

All medical schools are responsible to the Governing Board of their University and each University is responsible to the CHE.

**Legal authority to make decisions affecting the accreditation status**

As already mentioned the Council for Higher Education is the statutory body in Israel with sole authority in all matters concerning accreditation of higher education institutions and programs.

According to article 9 of the Council for Higher Education Law -- 1958 the Council may accredit a particular institution as an institution of higher education on the basis of rules prescribed by it for the accreditation of institutions of higher education.

Article 18 of the Law states that "The Council may withdraw its accreditation of an accredited institution on the basis of rules prescribed by it for this purpose; but those rules shall not limit the freedom of opinion and conscience".

Article 23 of the Law establishes the authority of the Council to empower an accredited institution, to grant recognized degrees, including academic medical degrees. According to Israeli Law, the authority of a statutory body (such as the CHE) to promulgate rules and regulations inherently includes the authority to amend, change, suspend or annul these same rules and regulation.

Hence, the Council for Higher Education has the requisite legal authority to make decisions affecting the accreditation status of the accredited institutions and recognized degrees, including medical schools and medical degrees.



### Initial Accreditation

A medical school in Israel must be a part of a not-for-profit university.

Any university that wishes to open a medical school, to gain accreditation and authorization to provide medical education and to grant an academic degree in medicine, must file a request with the Council. This request must include information about all aspects of the program: detailed curricula - including basic science and clinical studies, the school faculty, infrastructure and facilities for medical education, training hospitals, students and so on.

Once the Council receives the request it appoints a subcommittee, composed of professional academic medical personnel. The subcommittee examines the curriculae and facilities available to each university and the hospitals where the medical studies are held, and their suitability to the proposed curriculae. The subcommittee conducts on-site visits in order to inspect all aspects of the program and interviews the Rector (equivalent to an American Provost) of the University, the Dean, Faculty members and students, and suggests improvements. This is an interactive process culminating in a final full report submitted to the Council for Higher Education, which in turn decides whether to authorize the university to provide medical education and to grant academic degrees in medicine.

There are four Schools of Medicine in Israel, and there are no plans, in the foreseeable future, to open any new schools.

### Reevaluation

Until 1999 there was no system for the reevaluation of accredited institutions after the first accreditation, including universities with schools of medicine. However, Medical Schools in Israel always maintained a procedure of "self-study" of academic quality, carried out by independent committees of experts, usually external.



In view of its authority to implement reevaluation proceedings and reach decisions regarding the status of institutions of higher education, the CHE decided on February 23, 1999 (resolution no. 9/257 - Exhibit B - this resolution was part of the material Israel submitted on June 1999) to institute a process for the reevaluation of medical schools in Israel, and to establish a permanent committee for that purpose.

#### Reevaluation entity

Resolution no. 9/257 of February 23, 1999 passed by the Council states that: "The Council for Higher Education decided to establish a permanent committee that will be responsible for the evaluation process of medical schools in Israel. The goal of the committee will be to ensure the maintenance of recognized standards for medical education and the training of the physicians in Israel..."

On July 1999 the Chairman of the Council for Higher Education - the Minister of Education, Culture and Sport, appointed the committee composed of the following:

1. Prof. Irun R. Cohen, M.D. - The Weizman Institute of Science; Chairman.
2. Prof. Elyahu Antebi, M.D. - A representative of the Scientific Council of the Israeli Medical Association.
3. Prof. Shimon (Seymour) Michael Glck, M.D. - A representative of the Schools of Medicine in Israel.
4. Dr. Yitzhak Berlovitz, M.D., M.H.A. - A representative of the Ministry of Health.
5. Mr. Gil Be'er, Student - A representative of the Association of Medical Students.

The reports of the committee, and its recommendations regarding each university and its medical school, are to be submitted to the CHE. The Council has legal authority to make the actual decision regarding the accreditation status of the university (and its medical school).



#### Reevaluation process

According to resolution no. 9/257 of February 23, 1999 each medical school in Israel will be reevaluated once every 5 years. This reevaluation will be conducted according to the Re-Evaluation Procedures (exhibit C - these procedures were part of the material Israel submitted on June 1999)

Before every reevaluation, schools will be required to submit detailed self-study reports regarding their compliance with the Standards used by The Committee for Re-Evaluation of Medical Schools to Evaluate Medical Education (these standards were part of the material Israel submitted on June 1999). The school will prepare this report on the basis of a self-evaluation process. These reports will be analyzed by the committee's members.

The committee -- all of its members - will conduct a site survey to verify and update information compiled in the school's report, clarify any issues that are unclear, view at first hand the environment and facilities for learning, and interview administrators, faculty members, and students.

In case a school operates in several locations, the committee will conduct a site-visit in all of the school's separate campuses.

After the site visit the committee will hold one or more meeting to summarize the findings in a final report that describes the program of education and accounts for the school's compliance with each of the standards contained in the Standards used by The Committee for Re-Evaluation of Medical Schools to Evaluate Medical Education.

The final report will be submitted to the Council for Higher Education.

Schools may be asked to submit one or more progress reports in the interval, to address steps taken to correct specific areas of concern in the committee report, or to describe the results of program changes underway. Additional on-site visits maybe scheduled as needed.



#### **Controls against conflicts of interest**

The permanent Committee for Re-Evaluation of Medical Schools in Israel is governed by policy provisions that ensure that the members of the committee are free from conflicts of interests. The committee is composed of members who are not connected directly with the schools being examined. According to resolution no. 9/257 of February 23<sup>rd</sup> 1999, the committee consists of a chairperson who is a well known scientist from the Weizmann Institute of Science, a representative of the schools of medicine in Israel, a representative of the Scientific Council of the Israeli Medical Association, a representative of the Ministry of Health and a representative of the Association of Medical Students. These members are selected in accordance to qualifications detailed below.

All evaluations and site visiting are conducted according to common evaluation instruments, i.e. the Standards used by The Committee for Re-Evaluation of Medical Schools to Evaluate Medical Education and the Re-Evaluation Procedures, and thereby maintaining consistency in evaluation.

#### **Qualification of the members of the reevaluation committee**

Members of the committee are chosen from a pool of medical educators and academic administrators, representative of medical associations, and government health officials. They all must be prominent and well-known physicians with at least one medical specialty or scientists with a specialty in basic sciences fulfilling these same criteria and they must be of high moral integrity.

All committee members will receive training on the reevaluation process and their role in conducting reviews. They will also be trained in the standards to be applied to the school under review.

EXHIBIT-A



THE COUNCIL FOR HIGHER EDUCATION LAW, 5718 - 1958\*

1. Definition

In this Law,

"higher education" - includes teaching, science and research;

"an academic college" - an institution that has asked to use this appellation and is one of the following:

- (1) an institution of higher education, that is not a university, that was accredited in accordance with Sect. 9 and authorized to award to its graduates a recognized degree in one or more of its units, or which has received a permit in accordance with Sect. 21A;
- (2) it maintains at least one track of academic studies for which a university, which is authorized, with the approval of the Council, to award to graduates of the institution a recognized degree, and in which the program of study for a degree exists in full, is responsible; such an institution may include in its activities as well additional tracks of academic studies for which a university is responsible as stated, if the program of studies taking place in these tracks is to the extent of at least 75% of the program of study for a recognized degree.

2. The Council for Higher Education

There is hereby established a Council for Higher Education, the members of which shall be appointed by the President of the State (such Council being hereinafter referred to as "the Council").

3. The Functions Of The Council

The Council is the State institution for matters of higher education in the State, and it shall carry out the functions assigned to it under the Law.

3A. The Council

The Council shall be a body corporate competent in respect of any obligation, right or legal act.

3B. The Council - an Inspected Body

The Council shall be an inspected body, within the meaning of section 9(6) of the State Comptroller Law (Consolidated Version), 5718-1958.

3C. Engagement of Employees and their Terms of Employment

Employees of the Council shall be engaged and appointed by the Council in the same manner as State employees are engaged and appointed, with such modifications as shall be prescribed by regulations. The conditions of employment and remuneration of employees of the Council shall be identical with those of State employees.

\* This is an unofficial translation. The Hebrew version of the Law is the binding version.

- 3D. **Prohibition of Transfer of Property**  
The Council shall not sell or otherwise dispose of, pledge, or grant a lease of or lend for a period exceeding ten years, any property owned by it, save with the approval of the Minister of Education and Culture. A lease or loan for a period which together with preceding periods exceeds ten years shall also require approval as aforesaid.
- 3E. **The Budget**  
The budget shall be prepared and presented to the Government for approval in the manner provided by regulations.
- 3F. **Methods of Action and Corporation**  
For the purposes of sections 3A, 3C and 3D, the Council may act through a committee, from among its members or with the annexation of people who are not from among its members.
4. **The Number of Members of the Council**  
The number of members of the Council shall be prescribed from time to time by the Government upon the recommendation of the Minister of Education and Culture. They shall not be fewer than nineteen and not more than twenty-five, and shall include the Minister of Education and Culture.
- 4A. **The Composition of the Council**  
The members of the Council shall be proposed to the President of the State by the Government. At least two thirds of them shall be persons of standing in the field of higher education, who have been recommended by the Minister of Education and Culture after consultation with the recognized institutions of higher education and one member shall be the Chairman of the National Union of Israel Students. In the Council there shall be suitable representation of all types of institutions of higher education that have been accredited in accordance with sect. 9.
5. **Changes in the Composition of the Council:**
- (a) Where, during the term of office of any Council, the place of a member of the Council falls vacant from any cause whatsoever, another member shall be appointed in his stead, for the duration of the tenure of that council, in the manner which had been prescribed for the appointment of the member whose place has fallen vacant.
  - (b) Where a member of the Council is unable to actually serve for a specific period, the Minister of Education and Culture may propose to the President of the State to appoint a substitute for that member for that period.
6. **Chairman and Deputy Chairman**  
The Minister of Education and Culture shall be the Chairman of the Council, and the Council may elect from among its members a Deputy Chairman of the Council.
7. **Term of Office of the Council**  
The term of office of every Council shall be five years from the date of appointment of the members of that Council, provided that the first Council shall hold office for two years only.
8. **Procedures**  
The Council shall itself prescribe its procedure in so far as it is not prescribed by the Law or by regulations.

9. **Accreditation**  
The Council may accredit a particular institution as an institution of higher education on the basis of rules prescribed by it for the accreditation of institutions of higher education, or for types of them, in addition to the requirement of an appropriate scientific standard (such an institution being hereinafter referred to as an "accredited institution"); but those rules shall not limit the freedom of opinion and conscience.
10. **Government Approval**  
A decision of the Council to accredit an institution under section 9 shall require approval by the Government.
11. **Refusal to Accredite**  
Where an institution has applied for accreditation as an institution of higher education and the Council has refused the application, the Minister of Education and Culture, or the institution through him, may bring the application and the decision of the Council before the Government, which may return the same to the Council for reconsideration. The decision of the Council upon reconsideration shall be final.
12. **Reconsideration of a Request after Refusal**  
Where an application for accreditation has been refused by the Government, or where such an application has been refused by the Council upon reconsideration and the Government has approved the refusal, the institution may re-apply to the Council for accreditation after two years or such shorter period as the Government may have fixed in its decision.
13. **Certificate of Accreditation**  
An institution which has been accredited as an institution of higher education shall receive a certificate to such effect from the President of the State; notice of the issue of the certificate shall be published in the official governmental gazette.
14. **An Accredited Institution - A Corporation**  
An accredited institution shall be a corporation and shall be competent to sue and be sued, to acquire, possess and relinquish property, to enter into contracts and to be a party to any legal or other proceeding.
15. **Institutional Autonomy**  
An accredited institution shall be at liberty to conduct its academic and administrative affairs, within the framework of its budget, as it may think fit. In this section, "academic and administrative affairs" includes the determination of a program of research and teaching, the appointment of the authorities of the institution, the appointment and promotion of teachers, the determination of a method of teaching and study, and any other scientific, pedagogic or economic activity.
- 15A. **Comptroller**  
Sections 3, 4, 8-10, 12, 14B and C, and 24C of the Internal Comptrollers Law 5752-1992, *mutatis mutandis*, to the auditor of an accredited institution of higher education.

16. **Expansion of Institutions and Cooperation Between Them**  
The Council may, after consultation with the accredited institutions concerned, make proposals for their consolidation, expansion, improvement and mutual cooperation; the Council may also make proposals for the advancement of scientific research and the establishment of further institutions of higher education.
17. **Budgets of the Institutions**  
The Council may make proposals as to the participation of the Government in budgets of accredited institutions.
- 17A. **Criteria for Budgeting**  
State budgeting for institutions of higher education and academic colleges, in budgeting of which the State participates, shall be according to equal criteria that determine, *inter alia*, taking into consideration the types of institutions and development plans, instruction and research approved by the Council, a committee from among its members, or the Ministry of Education, Culture and Sport, as relevant.
18. **Withdrawal of Accreditation**  
The Council may withdraw its accreditation of an accredited institution on the basis of rules prescribed by it for this purpose; but those rules shall not limit the freedom of opinion and conscience.
19. **Government Approval for the Withdrawal of Accreditation**  
A decision of the Council under section 18 shall require the approval of the Government; but the Government shall not approve such a decision until the institution, the accreditation of which has been withdrawn, has been given a reasonable opportunity to plead its case and produce its evidence before the Minister of Education and Culture or a person appointed by him in that behalf; the Government may also return the matter to the Council for reconsideration, and upon its deciding to do so, the provisions of section 11 shall apply *mutatis mutandis*.
20. **Notification of Withdrawal of Accreditation**  
Where the Government has approved the withdrawal of the accreditation of an accredited institution, it shall notify the President of the State to such effect, and thereafter shall publish a notice to such effect in the official government gazette.
21. **Re-application After Withdrawal of Accreditation**  
An institution, the accreditation of which has been withdrawn, may, after two years of such shorter period as the Government may have fixed, re-apply to the council for accreditation, on the basis of evidence to be produced by the institution that the reasons which prompted the withdrawal of its accreditation no longer exist.
- 21A. **Permit**
- (a) No person shall open or maintain or advertise the opening or maintenance of an institution not recognized under section 9 which awards or promises to award an academic degree unless such institution has been granted a permit by the Council (hereinafter referred to as a "permit").
  - (b) For the purposes of this section, it shall be immaterial whether the institution is opened or maintained by an institution of higher education, either as an extension or a branch or otherwise.

- (c) The contents of this section notwithstanding, an institution as stated in section 2 according to the definition of "academic college" shall be opened or maintained only with the approval of the Council, according to rules that it shall determine.
- 21(B) **Rules and Conditions for a Permit**
- (a) The Council shall, after consultation with the Committee on Education and Culture of the Knesset, prescribe rules for the granting of a permit to institutions of higher education, or for types of them. Such rules shall be published in the official government gazette.
- (b) The Council may subject the grant of a permit to conditions to be fulfilled by the institution either before or after such grant.
- (c) Rules and conditions as aforesaid shall not limit the freedom of opinion and conscience.
- 21C. **Validity of a Permit**  
A permit shall be valid for four years. If the institution is not opened within four years from the date of the grant of the permit or is not accredited under section 9 either fully or partly or temporarily or conditionally, the Council may extend the validity of the permit for further periods not in the aggregate exceeding four years.
- 21D. **Government Approval**
- (a) Where the Council has decided to grant a permit, its decision shall require approval by the Government, and the Government's decision as to the permit shall be final.
- (b) The Council shall notify the applicant of a decision under subsection (a) within one year from the date of submission of the application.
- 21E. **Cancellation of a Permit**  
Where one of the rules or conditions on the basis of which the permit was granted is no longer fulfilled or is infringed, the Council may, after giving the institution an opportunity to be heard, cancel the permit or suspend it for such period as it may prescribe.
- 21F. **Appeal**
- (a) Where the Council has refused to grant or extend the validity of or has canceled or suspended a permit, the Minister of Education and Culture, or the institution through him, may lodge objection with the Government.
- (b) The Government may confirm the decision of the Council or return the matter to it for reconsideration. Where the Government has returned the matter to the Council, the Council shall reconsider it, and its decision upon reconsideration shall require the approval of the Government; the Government's decision shall be final.
- 21G. **Closure Order by a District Court**  
Where an institution has been opened or is maintained without a permit under Section 21A or without a license as stated in Section 25C, the District Court may, on the application of the Attorney-General, order that it shall be closed at such time and in such manner as the court may prescribe, provided that the closing order shall not come into force before the expiration of thirty days from the date thereof.

#### 21H. Designations that Require Approval

- (a) No educational institution shall use one of the following designations: "university", *tekhnon*, "technological institute", "faculty", "academy", *beit sefer gavoah* (lit. "high school", i.e. school above the level of a secondary school), *michlala academit* (academic college), *haskala gevoah* and *hinuch gavoah* (both "higher education", the first stressing the intellectual, the second the pedagogic aspect), either separately or in combination with another of them or as an adjectival or nounal adjunct to another designation, either in Hebrew or in a foreign language, unless the institution has been accredited under section 9 or the designation has been given it by Law or it has received approval therefor from the Council for Higher Education.
- (b) No educational institution shall use a designation which might be taken to refer to a permit or accreditation or license under this Law unless it has received such a permit or such accreditation, as the case may be.
- (c) The Council may, after consultation with the Committee on Education and Culture of the Knesset, prescribe rules for the approval of designations.
- (d) Notwithstanding the provisions of this section, an institution which holds a license as referred to in Section 25C shall be entitled to use one of the names mentioned in subsection (a), provided that it is preceded by the description branch or sub-division.

#### 22. Recognized Degrees

The Council may recognize a particular academic degree as a recognized degree on the basis of rules prescribed by it for the recognition of academic degrees (a degree recognized as aforesaid being hereinafter referred to as a "recognized degree").

#### 23. The Conferment of Recognized Degrees

- (a) The Council may empower an accredited institution, on the basis of rules prescribed by it for the empowerment of accredited institutions for the purposes of this section, to confer a recognized degree upon a particular person, or to confer recognized degrees generally, and it may prescribe rules concerning State examinations to be held as a condition for the conferment of a particular recognized degree by a particular accredited institution.
- (b) When authorizing an accredited institution to confer a recognized degree, as stated in sub-section (a), the Council shall not discriminate between accredited institutions because of their type. In this section, "recognized degree" - includes combinations of degrees and their customary abbreviations.

#### 24. Supervision of Conferment of Degrees

The Council may, itself or through a person appointed by it in that behalf, supervise the conferment of recognized degrees, and it may prescribe rules for supervision under this section.

#### 25. Protection of Recognized Degrees

A degree recognized under this Law shall be recognized for the purposes of any other law.

#### 25A. Equality of Degrees

The status of identical recognized degrees conferred by accredited institutions of higher education of different types - are the same.

## 25B. Aid to Students

- (a) In the program of assistance, that the State makes available to students in accredited institutions, within the framework of the State Budget Law, criteria will be determined, inter alia, for the preference of students who are permanent residents of areas of national priority as determined by the Government, and of students in institutions of higher education or academic colleges located in these areas;
- (b) In this section, "students in accredited institutions" - includes students who are studying for a degree that has been recognized in accordance with section 28A.

## 25C. Operating License for Institutions which Promise Academic Degrees

No person may open or maintain an institution which confers or undertakes to confer a degree or credit points towards a degree, and shall not advertise the fact of such institution having been opened or of its existence, if the institution has not been granted a certificate of permit pursuant to Section 21A, unless the institution is granted a license by the Council (hereinafter - license).

## 25D. Rules and Conditions for a License

- (a) The Council will grant a license as referred to in Section 25C to an institution (hereinafter - an institution in Israel) which is a branch or sub-division of an institution for higher education which operates in another country (hereinafter - the parent institution);
- (b) A branch or sub-division of a parent institution is an institution in respect of which all the following have been fulfilled to the satisfaction of the Council:
  - (1) The institution in Israel relies and is based on the academic institutions of the parent institution and does not maintain its own appointments committee or academic institutions which lay down policy and prescribe a study program;
  - (2) The parent institution is recognized as an institution of higher education according to the law which applies in the country in which it operates (hereinafter - the base country), and is authorized according to such law to confer academic degrees, including the degree promised or which are conferred on students of the institution in Israel;
  - (3) The Council has recognized a certain process of authorization for the award of academic degrees, which is carried out in the base country and in the empowering body of the parent institution;
  - (4) The tuition conducted by the institution in Israel is recognized by the parent institution in accordance with the law which applies in the base country, and is under the supervision of the parent institution;
  - (5) All the tuition conducted by the institution in Israel is identical or only slightly different to the tuition conducted in the same field as the parent institution in the base country;
  - (6) The institution in Israel conducts its tuition through lecturers who -
    - (a) all hold an academic appointment at the parent institution;
    - (b) at least 20% of them have their primary post at the aforesaid institution, or have been lecturing there on a permanent basis for a period of not less than four years;
  - (7) The study program at the institution in Israel, to an extent of at least 30%, is implemented through lecturers who have their primary post at the parent institution;

- (8) (a) If the degree which is promised or conferred on students of the institution in Israel is identical or equivalent to a recognized bachelor's degree customarily awarded in Israel at a recognized institution of higher education (hereinafter - bachelor's degree), the scope of the studies for the degree and the duration of the studies shall not be less, or shall be only slightly less, than the scope of the studies and the duration of the studies toward the degree for the aforesaid recognized bachelor's degree customarily awarded in Israel, provided that same shall not be less than six full academic semesters as are practiced in Israel;
- (b) If the degree which is promised or awarded to students of the institution in Israel is identical or equivalent to a recognized master's degree customarily awarded in Israel at recognized institutions for higher education (hereinafter - master's degree), the scope of the studies for the degree shall not be less, or shall be only slightly less, than the scope of the studies for the recognized master's degree customarily awarded in Israel;
- (c) "Scope of the studies" and "duration of studies" shall mean - either academic studies all of which are carried out at the institution in Israel or at the institution in Israel and at the parent institution jointly;
- (d) Notwithstanding the contents of this sub-paragraph in regard to the scope of the studies and the duration of studies, the Council may, in its plenary session and with the approval of the Knesset Education and Culture Committee, prescribe rules and provisions with regard to the recognition of precious post-graduate studies.
- (9) (a) If the degree which is promised or awarded to students of the institution in Israel is a bachelor's degree, the institution in Israel shall not accept students for studies except on the strength of an Israeli matriculation certificate ("buxrat"), or an equivalent certificate, but the institution in Israel may, in accordance with the rules of the Council prescribed in regard to institutions for higher education in Israel, exempt students from the requirement;
- (b) If the degree promised or awarded to students of the institution in Israel is a master's degree, the institution in Israel may not accept students for studies except on the strength of a bachelor's degree;
- (10) The degree promised or awarded to students of the institution in Israel is recognized according to the law which applies in the base country and is identical in all respects to the degree awarded by the parent institution to its graduates in the same study program in the base country;
- (11) The institution in Israel does not maintain a study program for a doctor's degree and does not confer or promise that it will confer a doctor's degree, unless it has been recognized for this purpose as an institution for higher education in accordance with Section 9;
- (12) The parent institution undertakes to regard graduates of the institution in Israel as qualified for advanced studies according to the same conditions which apply to graduates of the parent institution, and to accept students of the institution in Israel, in the event that the institution ceases to operate, for continued studies toward the degree for which they studied in Israel;
- (13) The institution in Israel maintains and conducts the tuition and studies at an appropriate place having suitable conditions, including the means required for ensuring a proper standard of studies.

**25E. Cooperation with Institutions for Higher Education**

(a) An institution in Israel which is a branch or sub-division of a parent institution shall not cooperate with an institution recognized for higher education or an institution which has received a permit pursuant to this law, unless this has been approved by the Council and on the conditions as approved by it.

(b) The Council may, under such conditions it may prescribe, approve for an institution in Israel which is a branch or sub-division of a parent institution, the use of buildings or other means of tuition of an institution recognized for higher education or of an institution which has received a permit pursuant to this law.

**25F. Participation in Budget**

The State will not participate in the budget of an institution in Israel which is a branch or sub-division of a parent institution, except on special grounds, with the approval of the Government, in accordance with a recommendation by the Council.

**25G. Information and Inspection**

The institution in Israel shall present the Council, at any time the Council may so demand, details with regard to its structure and its activities and any other information the Council may demand from it; the Council or a person acting on its behalf shall be entitled to visit the institution in Israel in order to inspect and check that the conditions of the license are being complied with.

**25H. Prescribing of Conditions**

(a) The Council shall be entitled to make the grant of a license, as referred to in Section 25C in order to comply with the provisions of Section 25D, subject to conditions, whether the institution in Israel is obliged to fulfill such conditions prior to the grant of the license or subsequent to the license being granted to it.

(b) The provisions of Section 25D shall not prevent an institution in Israel from conducting tuition and holding examinations in the Hebrew or Arabic language, unless the Council is of the opinion that conducting tuition and holding examinations as aforesaid is likely to prejudice the possibility of the parent institution maintaining supervision over the institution in Israel for purposes of complying with the provisions of the aforesaid section.

**25I. Temporary License**

The Council shall be entitled to grant a temporary license to an institution in Israel, for a period to be fixed by it, which shall not exceed four years, even if the institution does not comply with any of the conditions mentioned in Section 25D, and it shall be entitled to make such license subject to conditions as set forth in Section 25H.

**25J. Obligation of Disclosure in Advertisements**

An institution which holds a license shall mention in all its advertisements to the public that the degree which will be awarded to students at the end of their studies is an academic degree of the parent institution abroad and is not an Israeli academic degree, and shall indicate the identity of the base country; The manner in which the institution shall indicate that it holds a license from the Council shall be prescribed in rules by the Council, with the approval of the Knesset Education and Culture Committee.

- 25K. Revocation of Suspension of License**  
Should any of the conditions of Section 25D or any of the conditions for the grant of the license in accordance with Section 25H or 25I, not be complied with or cease to be complied with, or should the institution breach the provisions of Section 25K, 25G or 25J, the Council shall be entitled to revoke the license or to suspend it for such period as it specifies; the Council shall not decide on the revocation of the license, or on the suspension thereof, until it has given the institution the opportunity of presenting its case and has fixed a reasonable period for rectifying whatever requires to be rectified in order to ensure compliance with the aforesaid conditions or provisions.
- 25L. Giving of Decision**  
The Council shall notify the applicant for a license of its decision on his application within one year from the date the application is lodged.
- 25M. Repeat Application for Grant of License**  
An institution in Israel whose application for a license has been refused, or in respect of which the license granted to it has been revoked, shall be entitled after the elapse of one year, again to present an application to the Council for the grant of a license, on the strength of evidence it shall produce showing that the grounds which served for the refusal or revocation no longer apply.
- 25N. Notice Regarding Grant of License, Suspension or Revocation Thereof**  
Notice of grant of a license, suspension or revocation thereof, shall be published in Reshnut, and the date of the grant of the license, the suspension or revocation thereof, as the case may be, shall be mentioned therein.
- 26O. Rules for Implementation**  
The Council may, with the approval of the Knesset Education and Culture Committee, prescribe rules for the implementation of its powers and authorities pursuant to Section 25D to 25M.
- 26P. Status of Degree from Institution which Holds a License**  
A degree awarded to graduates of an institution which holds a license as referred to in Section 25C shall have the same status, for all purposes, as the identical degree awarded by the parent institution in the base country, and the grant of the license to the institution in Israel shall not constitute recognition by the Council of the institution in Israel as an institution recognized for higher education, nor shall it constitute any form of authorization to the institution in Israel to grant recognized degrees within the meaning thereof under this law.
- 26. A person who does any of the following acts shall be liable to imprisonment for a term of one year or a fine:**
- (1) supplies to or for the Council, in a manner within its competence, any information which he knows to be false;
  - (2) confers, or assists in the conferring of, a degree without being competent to do so under this Law;
  - (3) makes himself out to be the holder of a recognized degree conferred upon him under this Law while a degree as aforesaid has not been conferred upon him;
  - (4) contravenes any of the provisions of section 21A or a regulation made thereunder;
  - (5) contravenes any of the provisions of section 21E;

- (6) any person who contravenes any of the provisions of Section 25C;
- (7) any person who contravenes any of the provisions of Section 25G.

26A. Powers of the Commissioner for Consumer Protection

Without derogating from the contents of Section 26, a contravention under subparagraph (2) and (4) to (7) of the aforesaid section shall also be deemed to be a contravention under the Consumer Protection Law 5741-1981, and the Commissioner for Consumer Protection pursuant to the aforesaid law will, in respect of these offences, be vested with all the powers he has pursuant to Chapters E and F of that law.

27. The Law of the State

- (a) The provisions of this Law shall apply to the State as well, however sections 14, 15, 17 and 17A shall not apply to an institution for the training of teachers which the State maintains.
  - (b) The Minister of Education and Culture may, at the proposal of the Council or on his own initiative and with the Council's agreement, and with the approval of the Committee on Education and Culture of the Knesset, prescribe rules regarding the freedom of action of an institution as set forth in section (a) and in those matters listed in section 15, in whole or in part.
28. The Education Ordinance shall not apply to an institution which has been accredited or to which a permit has been granted and an institution to which a license has been granted under this Law.

28A. Recognition of Degrees of Recognized Institutions in the Area

The Council may recognize the degree of an institution of higher education accredited or which has been granted a permit by the Council for Higher Education that has been established by the Commander, in its definition in the Emergency Regulations (Judea and Samaria and Gaza District - Judgment of Crimes and Legal Assistance) 5727 - 1967, on the basis of rules that it will determine for this purpose. The status of a recognized degree, as stated, conferred to a person or in general, is the same as the same recognized degree conferred by an institution that has been authorized to confer recognized degrees, as stated in sections 22 and 23.

29. Implementation

The Minister of Education and Culture is charged with the implementation of this Law and shall bring before the Government decisions of the Council requiring approval, and proposals of the Council, and shall bring before the President of the State every matter required to be brought before him under this Law.

30. Regulations

The Minister of Education and Culture may, after consultation with the Council, make regulations for the implementation of this Law and, *inter alia*, regulations as to reasonable times within which the handling of applications for the grant of a license for institutions and in applications for the accreditation of institutions - from the submission of the application until the decision thereon - shall be completed by the Council and the Government.

August, 1999

EXHIBIT-B



**THE COMMITTEE FOR RE-EVALUATION OF  
MEDICAL SCHOOLS**

**Council for Higher Education Decision No. 9/257  
of February 23<sup>rd</sup>, 1999**

"The Council for Higher Education is deciding to establish a permanent committee that will be responsible for the evaluation process of medical schools in Israel. The goal of the committee will be to ensure the maintenance of recognized standards for medical education and the training of the physicians in Israel. The evaluations will be conducted once every 5 years, and the report will be submitted to the Council for Higher Education."

EXHIBIT-C



## THE COMMITTEE FOR RE-EVALUATION OF MEDICAL SCHOOLS

### Re-Evaluation Procedures

By the Council for Higher Education (CHE) Secretariat.  
Seven months beforehand, the CHE secretariat contacts a medical school to establish the dates for site visits in that year. Survey visits are two-day visits.  
At the same time, schools are sent a questionnaire based on the Standards used by The Committee for Re-Evaluation of Medical Schools to Evaluate Medical Education, so that they can compile a medical education database, undertake an institutional self-study and complete the report to the committee.

By the university and the school.  
The school completes the medical education database, so that it can be used as the basis for the institutional self-study and the final report.  
The dean appoints a self-study steering committee and subcommittees corresponding to the main elements of the database (e.g., Objectives, Governance/Administration, Educational Program for the M.D. degree, Medical Students, Finances, Faculty, Facilities, Research, etc.).  
The summary of the self-study and the final report are mailed to the CHE secretariats and to each member of the committee three months before the site visit.

**The committee's work**  
The committee conducts one meeting before the site visit, to assess the material received from the school.

The committee conducts a site survey to verify and update information compiled in the school's report, clarify any issues that are unclear, view the environment and facilities for learning first-hand, and meet with administrators, faculty members, and students.

The committee will meet with the dean to explain its purpose and gain decanal input in a conference at the beginning of the site visit, and meet with the dean and campus chief executive to summarize its findings about the program's strengths and problem areas at the completion of the visit.

