

U.S. Department of Education

Staff Analysis
of the Report Submitted by the

Cayman Islands

Prepared January 2007

Background

At its September 2002 meeting, the National Committee on Foreign Medical Education and Accreditation (NCFMEA) determined that the standards used by the Accreditation Commission on Colleges of Medicine (ACCM) on behalf of the government of the Cayman Islands to evaluate the St. Matthew's University School of Medicine (SMUSOM or St. Matthew's), a medical school located in the Cayman Islands, are comparable to those used to evaluate medical schools in the United States. The NCFMEA voted to limit this period of comparability to one year pending an opportunity for NCFMEA members and Department staff to observe an ACCM site visit at SMUSOM in March 2003. This site visit subsequently took place as scheduled.

At its September 2003 meeting, the NCFMEA formally accepted a report submitted by ACCM on behalf of the Cayman Islands and voted to extend for one year the Cayman Islands' period of comparability. The NCFMEA requested that the Cayman Islands submit, by June 15, 2004, a full report on its accreditation activities involving St. Matthew's for review by the NCFMEA at its September 2004 NCFMEA meeting. The purpose of the report was to provide the NCFMEA with:

- A list of medical schools currently operating in the Cayman Islands and their accreditation status;
- A summary of key accreditation activities during the period July 2003 – June 2004;
- A report of any changes to laws or regulations affecting the accreditation of St. Matthew's University since July 2003; any changes since July 2003 in the accreditation standards, processes or procedures that ACCM uses to evaluate and accredit St. Matthew's University; and
- A schedule of ACCM meetings and a listing of on-site visits to St. Matthew's University or its clinical clerkship sites planned for July 2004 through June 2005.

At its September 2004 meeting, the NCFMEA again accepted the report submitted by the ACCM on behalf of the Cayman Islands and voted to extend the decision of comparability for an additional three years. The NCFMEA also requested that the Cayman Islands submit an updated report covering the same accreditation information

and activities identified above for the timeframe 2004-2005 and its proposed activities for 2005-2006 for review at the NCFMEA's September 2005 meeting. However, the Committee did not meet again after the September 2004 meeting.

In October 2006, the Department forwarded a letter to the Minister of Education of the Cayman Islands notifying them of the spring meeting of the NCFMEA and offering them the opportunity to provide any additional information since their last submission. The Cayman Islands did provide additional information that has been incorporated into the staff analysis below.

Summary of Findings

ACCM has responded to the NCFMEA's request for information regarding the ACCM accreditation activities as they relate to the Cayman Islands. The standards and processes that ACCM applies to its evaluation of medical education programs remains substantially comparable to the guidelines established by the NCFMEA. Two areas that the Committee may want to pursue further with ACCM are 1.) ACCM's evaluation of and conclusions regarding the contractual agreement that SMUSOM, in 2005, entered into with outside entities to provide educational services to its students and the impact of the quality of the SMUSOM program, and 2.) the audit provided to ACCM that indicated a significant shareholders deficit.

Staff Summary

List of medical schools and their accreditation status:

St. Matthew's University School of Medicine (SMUSOM) is the only medical school operating in the Cayman Islands.

In June 2004, ACCM granted SMUSOM provisional accreditation for a period of three years. This grant of accreditation is conditional upon the school presenting satisfactory evidence that it has taken the following actions:

- 1) Provided an annual progress report;
- 2) Completed a satisfactory yearly on-site review by ACCM of the Grand Cayman campus;
- 3) Completed a satisfactory review of the Windham, Maine, campus in 2005;
- 4) Continued to evidence the participation and authority of the Board of Trustees;
- 5) Continued to demonstrate the involvement of a senior clinical faculty with a dedicated role in the management and review of 3rd and 4th year training and continued availability of copies of evaluation reports by senior clinical staff of affiliated teaching hospitals;
- 6) Resolved staffing issues in pharmacology/therapeutics and biochemistry;

- 7) Conducted an accurate analysis of MLE step 1 results with progress toward an 85% “first time take” in 2007; and
- 8) Provided accurate information regarding the policy of student admissions, number of admissions, staff/student ratios, entrance GPAs and MCAT scores, and the attrition rate.

Overview of Accreditation Activities:

ACCM, on behalf of the Cayman Islands, submitted its 2005 report on the accreditation activities with respect to SMUSOM.

In accordance with the conditions for provisional accreditation listed above, on May 2-3, 2005, the ACCM conducted a site visit at the newly restored main SMUSOM campus in the Cayman Islands before traveling to the satellite campus in Windham, Maine.

The ACCM noted that the September 11, 2004 hurricane caused damage to all of the SMUSOM facilities at the Cayman campus and that classes there resumed on May 2, 2005, the day of the ACCM visit. The ACCM noted that restoration of the facilities equaled or exceeded prior accommodations, citing among other things, an improved reading room/library and staff office accommodations. During the restoration of the Cayman Island campus, the school immediately found teaching and student-housing accommodations for those displaced by the hurricane in Portland, Maine and conducted all classes at a rented facility in Portland, Maine and the Windham campus until classes resumed at the refurbished campus in May 2005.

The school addressed two of the recommendations ACCM made in its 2004 report. The ACCM noted that the school’s Board of Trustees improved its commitment to the school and that the USMLE, Step 1 examination results for 2004 reached the 85 percent goal earlier than the 2007 date set by the ACCM. To ensure the validity of the results, SMUSOM advises newly enrolled students that progress to the third year is dependent upon the school receiving the student USMLE, Step 1 results.

Issues that remained outstanding (including those from the 2004 Report) included the following:

- Greater organization and structuring of the third year clerkship course to include greater input into clerkship organization, selection and inspections and more descriptive written assessments of the hospital teaching program that includes a critical analysis of content and structure of the teaching programs.
- Improvement in basic science staffing, particularly in the area of Pharmacology.
- A year-by-year analysis of the factors such as applicant applications, admissions, entrance, GPA and MCAT results, staff/student ratios, intra-college student progress, and attrition rates and to determine the relevancy to the USMLE, Step 1 results.

- Any expansion of student numbers must be accompanied by clear evidence of satisfactory teaching standards, sufficient staff and suitable facilities following LCME guidelines for increasing class size in accredited medical schools.
- The school must submit clearly defined and relevant outcome information relating to the number of students who graduate and the percentage of graduates who obtain residences.
- The school must provide administrative and academic support for the Chief Academic Officer to ensure efficient and effective leadership on both campuses.
- The Board of Trustees should consider and provide its views of the relationship between the number of students and the school's resources.
- The ACCM wants clarification on the use of "green" and "blue" line rotations.

Regarding the Windham, Maine campus, the ACCM recommended the following:

- Regularly review the teaching faculty to ensure modern concepts are used.
- Ensure the college management keeps the satellite staff in Windham informed of the policies and decisions of the Board of Trustees and the various faculty committees' policies.
- Meetings of the Board of Trustees to be held on the Windham campus.

As a result, ACCM concluded in 2005 that St. Matthew's was satisfactorily addressing concerns with respect to educational goals as demonstrated by the improved Board of Trustees commitment, evaluation of clinical students, and improved "first time" USMLE results.

ACCM made 11 visits to clinical sites used by SMUSOM between September 14, 2004 and April 28, 2005. The site visitors assessed facilities, student participation, student assessment, teaching evaluation, and quality of rotations. The following list provides dates and locations of the site visits:

<u>Date</u>	<u>Location</u>
September 14, 2004	St. Agnes Hospital, Baltimore, Baltimore, Maryland ¹
• January 21, 2005	Sligo General Hospital, Ireland
• March 21, 2005	Peninsula Hospital Center, Far Rockway, New York
• March 22, 2005	St. Barnabas Hospital, Bronx, New York
• March 23, 2005	St. John's Episcopal Hospital, Far Rockway, New York

¹ The ACCM combined the site visit of SMUSOM and the American University of the Caribbean (AUC), also accredited by ACCM, since the teaching program is the same for both medical schools.

- April 26, 2005 Atlanta Medical Center, Atlanta, Georgia
- April 27, 2005 Christian Hospital, St. Louis, Missouri
- April 27, 2005 St. John's Mercy Hospital, St. Louis, Missouri
- April 27, 2005 Forest Park Hospital, St. Louis, Missouri
- April 28, 2005 Sacred Heart Hospital, Pensacola, Florida
- April 28, 2005 Florida Hospital, Orlando, Florida

In June 2006, ACCM submitted another report of its activities. The country stated that since its last submission, SMUSOM had undergone a change in ownership. In accordance with its procedures, the ACCM conducted an on-site visit from March 31 to April 3, 2006 to ensure that the school continued to meet the country's accreditation standards. The country was notified that Equinox, a financial company, had purchased a majority interest (89.6%) in St. Matthews School of Medicine on January 27, 2006. The previous owners continue to own a 10.4% interest in the school.

During the on-site visit, ACCM team members met with the senior administrative staff, deans and department heads, faculty, and students. All groups noted that there had been no major changes with regard to the budget or academic freedom and all voiced confidence in the new ownership. The students also noted the recent improvements to the library and the fact that student governance at the school remained in tact. The team also toured the campus teaching facilities, student residences, the library, and reviewed recent information technology enhancements. The ACCM concluded that the new ownership would allow the school to continue to comply with its accreditation standards. ACCM reports that the overall governance of the school was not affected by the ownership change.

The results of the on-site visit noted that during 2005, student admissions increased 45% compared to 2004 to 444 students. The school also reported that it was closing its basic sciences program in Windham, Maine and would begin teaching basic sciences courses on the Grand Cayman campus beginning in 2007. The on-site visit report provided a detailed description of the team's findings for each accreditation standard (referred to by the agency as an Element). A synopsis of the report pointed out several strengths including:

- Refurbishing the library/reading-room/media center.
- Quickly replacing faculty members that resigned after the devastating hurricane in 2004.

- Increasing the basic sciences faculty by six positions that will be filled in 2006 (In its latest submission the ACCM did not provide additional information whether the additional faculty members had been hired).
- Establishing a collaboration between the school of medicine and the Health Services Authority of the Cayman Islands.
- Establishing a clinical curriculum committee.

The synopsis also identified weaknesses that included:

- A delay in implementing the requirement to pass the USMLE step 1 test to enter the school's clinical courses in year 3. The delay in implementation was a result of the disruption in courses caused by the hurricane and the school has indicated that this requirement will be implemented in January 2007.
- The inability of the school to provide accurate passage rates for the USMLE step 1 examination because of resistance from students to provide test results.
- The failure of the school to achieve an 85% first-time passage rate of the licensing examination from data collected by the school (the passage rate reported by the school for 2005 was 74%; however, as noted above the ACCM believes that this data may be inaccurate because of difficulties in obtaining test results from students).
- Disruptions to the educational program due to preparation for the USMLE examinations. The report states that a majority of students take a leave of absence in both their 3rd and 4th years to study for the USMLE examinations.
- The number of second-year students that needed to repeat courses and in some cases, entire semesters.

The on-site report also made several recommendations:

- Success has to be demonstrated through qualitative assessments including first-time passage rates on the USMLE step 1 examination.
- Effort must be made to ensure that results are obtained from all students taking the USMLE step 1 examination. For example, the school admitted 230 students in 2003 but in 2005 only 93 first-time test results of the 230 that were eligible to take the test were made available to the school.
- Additional detail needs to be provided on the school's annual report regarding the quality of teaching and facilities. Careful attention needs to be given to the ability of the school to support the increased student population with regard to facilities and faculty.
- The school should place an admission cap of 200 students for years 2006 and 2007. The school reported that it had enrolled 180 new students in 2006.
- Accurate information needs to be provided by the school regarding its alumni including acceptance into residency programs and licensure passage rates.
- That the clinical curriculum committee must meet regularly to review clinical site visit reports, student log books, and the appropriateness of basic science

courses. In its first meeting the committee decided that all clinical sites must be inspected at least once every two years.

- That the Board of Trustees be involved in the assessment of whether the increase in students has been matched by an improvement in the quality of students and faculty.

Additionally, the ACCM reports that the change in ownership did not affect the membership of the Board of Trustees except that it has added a member that represents the school of veterinary medicine that opened in 2005 (additional information on the school of veterinary medicine is given below). The Board also was renamed and is now the Board of Trustees of the St Matthew's University Schools of Medicine and Veterinary Science. Based upon the resume submitted by the country, the ACCM believes that the new board member is qualified to serve on the board.

From June 2005 through March 2006 the ACCM visited eight hospitals that are providing clinical training to SMUSM students. The sites visited were:

1. Whipps Cross, London, UK
2. Stepping Hill, Stockport, UK
3. Harbor Hospital, Baltimore, Maryland
4. Sheppard Pratt, Maryland
5. Barnsley, Yorkshire, UK
6. Jackson Park, Chicago, Illinois
7. Mount Sinai, Chicago, Illinois
8. Northern Virginia Mental Health Institution, Virginia

The ACCM teams concluded that the clinical locations were providing a satisfactory education. However, the team did voice concern regarding the Jackson Park location. The team noted that at the Jackson Park clinical site the specialty preceptors were not sufficiently qualified; the pediatric teaching program was deficient in bedside teaching and was inadequately staffed; student evaluation was deficient; family practice lacked a community service experience; there needed to be greater differentiation between the Internal Medicine and Family Practice experience; there was inadequate staff to service the students accepted; and the library facilities were poor.

The ACCM report regarding the financial condition of the school stated that the most recent audit showed no financial debt and that a new budget had been agreed upon that was satisfactory to the Chair of the Basic Sciences Department. The Department staff

review of the budget showed that the school ended with a net income greater than \$4 million dollars but that there was a stockholders deficit of \$1.9 million dollars. The Committee may wish to explore with the country whether this deficit was a one-time event or whether it poses a long-term threat to the financial stability of the institution.

Laws and Regulations

ACCM reports no changes to laws or regulations affecting the accreditation, standards, processes or procedures.

Standards, Processes and Procedures:

ACCM also reports no substantive changes in the accreditation standards, processes or procedures that it uses to evaluate and accredit St. Matthew's University.

Schedule of Upcoming Accreditation Activities:

In supplemental information submitted June 2006, ACCOM reported that it would meet in November 2006 and during 2007 it will conduct visits to the "remaining affiliated hospitals," and the school's administrative center in Orlando, Florida. The report did not identify what hospital sites would be visited.

Other Information:

St. Matthew's University Veterinary Medical School:

During a meeting with the SMUSOM President, Vice President, and Chief Financial Officer, the ACCM received notification of plans to open a Veterinary Medicine School in the fall of 2005. The Cayman Island Minister of Health and the Department of Agriculture support the opening of a new school that has already obtained a charter and license to operate. According to the SMUSOM President, the opening of a school of veterinary medicine will not impact SMUSOM financially or otherwise. For example, the veterinary science school will have its own faculty; administrative staff; equipment and building separate from SMUSOM. To monitor this venture, the ACCM has requested the SMUSOM Board of Trustees to supply it with copies of relevant minutes regarding the veterinary school so that it may assess whether or to what extent the venture impacts on the academic or administrative stability of SMUSOM.

In supplemental information submitted June 2006, ACCM reported that the veterinary school opened in 2005 with a cohort of 20 students. The school is presently housed in a building adjacent to the medical school with both schools sharing a lecture hall, reading room, and the library. The current administrators informed the ACCM that this was a temporary arrangement and that a facility was being readied for the veterinary

school at a separate location. The report did not provide any indication on when the veterinary school would move to its new location.

Harvard Medical Faculty Physicians Group and Harvard Medical International:
In February 2005, the SMUSOM entered into an agreement with the Harvard Medical Faculty Physicians (HMFP), Department of Emergency Medical Center, Inc., a Massachusetts non-profit corporation, to provide specific services to SMUSOM. The specific services identified in the agreement include:

1. The Clinical Observership Program (i.e., Shadowing). This program offers students didactic instruction with Harvard medical students and residents, shadowing opportunities in the Beth Israel Deaconess Medical Center Emergency Room, the cardiac catheterization lab and the ambulances.
2. Advanced Cardiac Life Support Teaching. The HMFP faculty will provide SMUSOM 5th semester students training in Advanced Cardiac Life Support and train SMUSOM faculty to be instructors
3. Biostatistics and Epidemiology. HMFP faculty will provide education in the first semester Biostats/Epidemiology course.
4. Clinical and Basic Research. SMUSOM and HMFP have agreed to pursue research opportunities for SUM students on both the basic and clinical levels.

The ACCM indicated that it would review the consequences of this agreement and other developing relationships in 2006 when the school submits its progress report on its activities. No updated information was provided in the 2006 supplement however, though it is common practice in US accreditation for accreditors to evaluate and approve substantive changes proposed by their accredited institutions to ensure that these changes maintain the educational quality expected by the accreditor.

Complaint:

Previously the NCFMEA received information that in August 2004, Department staff received a copy of a letter of complaint from a former St. Matthew's University medical student who had attended the school at its former Belize campus. The letter alleged that the facilities at the St. Matthews' Maine campus were inadequate for second year basic science students and that program supervision and structure were nonexistent. In response to a reminder that NCFMEA guidelines require accrediting agencies to establish a process for receiving, investigating, and following up on student complaints related to accreditation standards and procedures, the ACCM adopted its complaint policy in September 2004 and circulated it to all of the medical schools that it accredits.

As the ACCM promised to the NCFMEA at the September 2004 meeting, it conducted an investigation regarding the August 2004 complaint in accordance with its complaint policy that culminated in a meeting with SMUSOM administrative officers on May 6, 2005, following the site visit in Windham, Maine. In conjunction with the investigation of the August 2004 complaint, the ACCM also addressed a second complaint dated February 28, 2005 that the same complainant allegedly sent to the NCFMEA through

the Department. The second letter claims that the Medical Board of California (MBC) found problems at the SMUSOM Maine satellite campus with the clerkship programs and the admission process, among other things. Because of these findings, MBC denied the SMUSOM application to allow its students to pursue clinical clerkships in California and its graduates to take the California licensure examination.

The complainant initially raised issues identified in the conclusions in the ACCM 2004 report, primarily related to the curriculum and facilities and equipment at the Windham campus. In the more recent complaint, issues addressed in the MBC report have also been raised by ACCM in its 2005 report to the school. The ACCM concedes that problems exist with validating the results of USMLE step 1 examination and that more needs to be done regarding the admission committee composition, procedures, and policies, as well as attrition rates.

During the hearing, the SMUSOM administrative officers addressed the allegations in the first complainant regarding the Government of Belize and a banking institution in that country and issues regarding facilities and equipment at the Windham, Maine facility. Department staff observed the conduct of the site team evaluation hearing and based upon the evidence presented determined that neither the first nor second complaint were valid. In addition, the letter acknowledging receipt of the complaint that the Department mailed to the complainant in Portland, Maine was returned, addressee unknown. In addition, the complainant alleged that he was one of the students interviewed in 2004 by the MBC team, however, SMUSOM records show that the individual terminated his enrollment at the Belize school in November 2001, after matriculating for only two months. While in Maine, Department staff visited the hotel where the displaced students were housed and found that the Maine address given by the complainant actually belonged to that now vacant facility that previously housed the SMUSOM Cayman Island students. Upon examination of the signatures of the two complaint letters, Department staff also found that the signatures were exceptionally different, suggesting that these complaints were not valid. The questionable signatures on the documents and the additional information provided by SMUSOM administrators, created issues that did not address the ACCM standards. At the conclusion of the hearing, the ACCM determined that no further investigation was required.

A July 8, 1999 letter from the Maine Department of Education dispels any claims that the school operates the Windham campus without the approval of the Maine Department of Education. Therefore, the anonymous claims are unfounded.

Hurricane Ivan and temporary relocation to Maine

Regarding the temporary relocation of the Cayman Island campus to Windham, Maine, the Maine Department of Education, confirmed the extension of a prior agreement concerning medical school instruction offered to SMUSOM students in Maine. On July 8, 1999, the Maine Department of Education authorized the working relationship between the St. Joseph's College of Maine and SMUSOM. The authorization allowed SMUSOM faculty to teach certain basic science courses in the medical school

curriculum at or near the St. Joseph's College (SJC) campus to students enrolled in both institutions. In addition, the Maine Department of Education granted permission to SMUSOM to offer up to two semesters of SMUSOM coursework to SMUSOM students in Maine. With the approval of the Maine Attorney General, the Department of Education granted the working relationship between SJC and SMUSOM. However, the authorization precluded SMUSOM from soliciting students from Maine or offering United States or Maine credit for the SMUSOM courses taught, granting degrees, offering a full degree course to students in Maine, advertising SMUSOM or making claims regarding the school while teaching in Maine. Following the September 2004 hurricane, the Maine Department of Education again agreed to allow SMUSOM students and faculty to remain in temporary quarters while completing the extensive repairs to the Cayman Island facilities. Additional limitations precluded the school from the issuance of either a license or accreditation of SMUSOM by the State of Maine. In March 2005, the Maine Department of Education extended the agreement through the end of the spring semester 2005. As stated earlier, the Cayman Island facility reopened on May 2, 2005.