

DRAFT

U.S. Department of Education

Staff Analysis
of the Report Submitted by

Mexico

Prepared January 2007

Background

At its Spring 2004 meeting, the National Committee on Foreign Medical Education and Accreditation (NCFMEA or the Committee) determined that Mexico's medical accreditation entity the Consejo Mexicano para la Acreditación de la Educación Médica, A.C. (the Mexican Board for the Accreditation of Medical Education), hereafter referred to as COMAEM or "the Board", used accreditation standards and evaluation procedures for medical schools comparable to those used in the United States. The NCFMEA requested that Mexico provide information and applicable supporting documentation in a report for review at its Spring 2006 meeting on the following areas identified in the Department staff report:

- Standards established by COMAEM that schools must follow regarding biomedical research and the humane care of animals.
- Requirements regarding qualifications and training that COMAEM has established for its decision-makers and policymakers.
- Procedures that COMAEM has established to prevent the inconsistent application of standards in making accreditation decisions.

In addition, the NCFMEA requested that COMAEM include in the report information regarding the current status of medical schools, an overview and summary of key accreditation activities, including site reviews and accreditation decisions, changes in its laws and regulations, standards and procedures, and information about various meetings and training sessions and site visits to medical schools and clinical clerkship sites planned for 2006. The information provided in this report responds to the Secretary's May 14, 2004 letter.

Summary of Findings

The COMAEM has responded to the NCFMEA request for information and based on the information provided it appears that the evaluation system in Mexico remains substantially comparable to the system used in the United

States to evaluate the quality of medical education. Differences are notable in the area of biomedical research and the humane treatment of animals, which is not required as part of the medical education curriculum and for which COMAEM has no standards. Also, COMAEM has not provided documentation that it has written policies or procedures that establish the qualifications and training required for its policy- and decision-makers and site evaluators or written procedures to prevent the inconsistent application of standards by the decision-making body or site evaluators. The agency did, however, list its qualification requirements for policy- and decision-makers and reported that it relies on training sessions and review across site team reports to maintain consistency. Finally, there is some confusion regarding the status of the 24 remaining unaccredited medical education programs for which the country did not give an accounting. Therefore, COMAEM needs to clarify the status of these programs in relation to its oversight responsibilities.

Staff Summary

1. Areas of concern identified in the Department staff report on Mexico prepared for the March 2004 NCFMEA meeting:

- Lack of written standards established by COMAEM that schools must follow regarding biomedical research and the humane care of animals.

Previously Department staff found that COMAEM did not provide any information about establishing any curriculum requirements regarding the laboratory or other practical exercises that facilitate the ability to make accurate quantitative observations of biomedical phenomena and critical analyses of data. In its report, the Country indicates that it does not yet require biomedical research and the humane care of animals as part of the medical education curriculum.

- No evidence of the qualifications and training requirements that COMAEM has established for its decision-makers and policymakers.

Previously Department staff found that COMAEM did not provide any information on the qualifications or training necessary to qualify as a COMAEM policy-making or decision-making official. COMAEM lists the following qualifications and training requirements for its policy- or decision-making officials:

1. Experience in medical education and its administration.
2. Experience as a dean of a medical school.
3. Experience in the accreditation of medical schools; i.e., having participated in accrediting courses and activities as well as having occupied the various positions on site-visit teams.

4. Integrity in positions occupied

This written response outlines the qualifications required of persons who may serve as policy- or decision-makers on COMAEM. However, COMAEM did not provide supporting documentation in the form of a written policy or operating procedure or the curricula vitae of its current membership to demonstrate the implementation of the written policy or procedure(s).

- No evidence of procedures to prevent the inconsistent application of standards in making accreditation decisions.

Previously, Department staff found that COMAEM did not include any information about the measures it used to prevent the inconsistent application of standards in making accreditation decisions. In the written response, COMAEM states that it:

- Organizes training sessions with the objective of unifying the criteria among and applied by site evaluators and
- Reviews the reports submitted by the onsite visit teams in order to identify application inconsistencies.

COMAEM added that within two years of the 2006 report it would review the performance of site visitors and the self-study instrument to assess whether the evaluators and COMAEM were consistently applying the standards during the review process.

2. Report on accrediting activities involving Mexican medical schools through December 1, 2005

Current status of medical schools:

COMAEM reports that there are a total of 80 medical education programs eligible for accreditation. Of these, COMAEM reports that it has accredited 43 programs. All but one of the accredited programs hold an accredited status for as little as one year to as much as four years remaining on the current grant of accreditation. The accreditation term for the remaining program expired in December 2005 and no other accreditation information was provided.

The COMAEM lists four other programs with overdue accreditation terms that range from July 4, 2004 to January 22, 2006. Nine programs do not hold an accreditation status with COMAEM; however, two of those programs are in the self-study phase. COMAEM reports that it does not know whether the remaining programs have started the self-study phase. It reported that one program had a favorable result following a preliminary visit, but did not disclose the accreditation status.

In addition, there appears to be a discrepancy in the numbers, because Department staff counted only 42 COMAEM accredited medical education programs. Overall, it is not clear what the accreditation status is of the remaining medical education programs and whether COMAEM has oversight responsibility for these programs.

Overview of accreditation activities:

COMAEM reports that it accredited 33 medical education programs from 2002 to February 1, 2006, of which 20 programs received initial accreditation and 13 programs received reaccreditation. As identified in the above section, there is a discrepancy in the number of accredited programs.

Laws and regulations:

During 2004 and 2005, COMAEM reports that two changes have occurred in its laws or regulations affecting the accreditation of medical school(s) in Mexico. First, COMAEM reports that it no longer renders provisional accreditation status to medical education programs. Second, COMAEM refers to a new "Official Guideline No. 304" regarding the use of clinical sites. Although COMAEM did not provide a copy of Official Guideline No. 304, it reports that a medical school will not be eligible for public health system clinical site placement and training if it has not been duly accredited by COMAEM. According to COMAEM, this Guideline became effective February 2005 and will affect students enrolled in unaccredited medical schools who start their clinical enrollment after that date.

Standards:

COMAEM reports that there have not been any changes to the accreditation standards used to evaluate and accredit medical schools during 2004 and 2005.

Processes and procedures:

COMAEM reports that there have not been any changes during 2004 and 2005 in the accreditation processes or procedures.

Schedule of upcoming accreditation activities:

COMAEM listed three site visits to occur in 2006. Of the three, two occurred at schools with programs overdue for an accreditation review and the other was an unaccredited program. The COMAEM did not report that it had any accreditation meetings or visits to clinical clerkship sites scheduled in 2006.