

U.S. Department of Education

Final Staff Analysis of the Report Submitted by Dominica

Prepared October 2011

**Background**

In October 1997, the National Committee on Foreign Medical Education Accreditation (NCFMEA) first determined that the accreditation standards used by the Medical Board of Dominica (the Board) to evaluate medical schools on Dominica were comparable to those used in the United States. In 2001 and again in 2007, the NCFMEA reaffirmed its prior determination that the standards and processes used by the Board for the evaluation of medical schools remains comparable. The NCFMEA also requested that the Board submit periodic reports describing its continuing accreditation activities.

The NCFMEA met in March 2009 to review the report submitted by the Board regarding its accrediting activities. The NCFMEA formally accepted the Board's report and requested that it submit a report for review at the spring 2010 NCFMEA meeting updating the Committee on its accrediting activities and addressing, specifically, the relationship between the Board and the Bahamas and its activities related to All Saints University School of Medicine and any additional studies at Ross University School of Medicine.

Dominica did submit its report timely but the NCFMEA did not meet in spring 2010. The report was placed on hold due to the pending appointment of new NCFMEA committee members and the designation of a committee chair. Due to the lapse in time, the Board was invited to submit updated information.

**Summary of Findings**

Based on its review of the information submitted by the country, Department staff concludes that Dominica addressed the NCFMEA's request for a report of its accrediting activities. This report specifically addressed the relationship between the Medical Board of Dominica and The Bahamas and its activities related to All Saints University School of Medicine and any additional studies at Ross University School of Medicine.

Regarding the relationship between the Medical Board of Dominica and The Bahamas, Department staff notes that since Ross University School of Medicine no longer provides any medical education or services in The Commonwealth of The Bahamas, no additional information is required.

Regarding its accrediting activities, Department staff reviewed the final report from the site visit conducted by the Board in October 2010 to Ross University School of Medicine. Department staff noted that one outstanding issue remained and would be specifically reviewed as part of the five-year accreditation renewal visit scheduled for October 2011.

With regard to All Saints University School of Medicine, Department staff recommends to the NCFMEA that it address with the Board the incorrect or misleading information released by All Saints University School of Medicine on its website and the expectation of U.S. accreditors to take a proactive approach to provide for the public correction of such information.

Department staff also concludes that Dominica's accrediting actions during the reporting period are not inconsistent with NCFMEA guidelines.

### **Staff Analysis**

#### **Outstanding Issues**

##### **The relationship between the Medical Board of Dominica and the Bahamas.**

#### **Country Narrative**

By letter dated August 27, 2009, C.F. Johnson, Permanent Secretary of The Ministry of Health of The Commonwealth of The Bahamas wrote to Dominica Medical Board ("Board") Chairman Dr. Dorian Shillingford requesting that the Board confirm the currency of the Board's accreditation of Ross University School of Medicine ("RUSM") including, in particular, the Board's accreditation of the Freeport location. See Letter from C. Johnson to D. Shillingford (Aug. 27, 2009) (Exhibit A). By letter dated September 21, 2009, Board Chairman Shillingford responded to Secretary Johnson's letter, explaining that on December 16, 2006 the Board granted RUSM continuing certification for a period of five years, subject to compliance with the Standards and Procedures for Certification of Medical Education Programmes ("Dominica Standards and Procedures"). See Letter from D. Shillingford to C. Johnson (Sept. 21, 2009) (Exhibit B). Board Chairman Shillingford further explained that, in March 2009, the Board found RUSM temporarily in overall compliance with the Board's standards with respect to the Freeport location, and that the Board would reconsider the matter in the context of a site visit in November 2009. See id. As explained further in Question 2, the Board conducted the November 2009 site visit.

#### **Analyst Remarks to Narrative**

The Medical Board of Dominica (Board) provided information and documentation to indicate that the only relationship between the Board and The Bahamas relates to Ross University School of Medicine (RUSM). Specifically, The Ministry of Health of The Commonwealth of The Bahamas inquired as to the current accreditation status of RUSM, to include the campus in Freeport, by the Board, and also expressed appreciation of the Board's continued review of RUSM to ensure a high standard of quality for the medical education and services. In response, the Board confirmed RUSM's current accreditation status, which includes the Freeport location, and indicated that a site visit would occur in November 2009.

While Department staff appreciates the information and documentation provided by the Board, the staff recommends a more-formal agreement between the Board and The Bahamas concerning the accreditation and review of RUSM is necessary to demonstrate that the accreditation process covers the entire educational program, and the Board is clearly designated as the entity responsible for evaluating the quality of medical education.

### **Country Response**

The Board has understood for some time that RUSM expected to terminate its activities in The Bahamas. RUSM has formally informed the Board that it currently has no students engaged in academic activity in The Bahamas and it has no plans to offer any aspect of the medical education program to students in The Bahamas. See Letter from J. Flaherty to D. Shillingford (Aug. 8, 2011) (Exhibit 1). In the circumstances, the Board believes that a formal agreement between it and The Bahamas is not needed.

### **Analyst Remarks to Response**

The Medical Board of Dominica provided information and documentation to indicate that Ross University School of Medicine no longer provides any medical education or services in The Commonwealth of The Bahamas. Therefore, no additional information is needed concerning the relationship between the Medical Board of Dominica and The Commonwealth of The Bahamas.

Staff Conclusion: Comprehensive response provided

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**Accreditation activities within Dominica, including anything related to All Saints University or to any additional studies at Ross University.**

### **Country Narrative**

## 1. Review of RUSM compliance with Dominica Standards and Procedures and related site visits

As indicated to Ross University School of Medicine (“RUSM”) in the March 2009 site visit report for the RUSM Freeport location, the Board conducted in November 2009 a follow-up site visit to the RUSM Portsmouth campus and Freeport location. See Report of a Site Visit to RUSM, Freeport Facility, Grand Bahama, March 1-3, 2009 (Exhibit C). Consistent with the Board’s procedures and conflict of interest policy, the Board duly appointed site visit teams. One team visited RUSM’s main campus in Portsmouth, Dominica on November 2-6, 2009. A second site visit team visited RUSM’s Freeport location on November 11-13, 2009. In accordance with Dominica Standards and Procedures, after providing RUSM an opportunity to respond to the site visit teams’ findings, the Board accepted and adopted the site visit teams’ findings and recommendations. By e-mail dated March 2, 2010, the Board transmitted the final site visit report. The final site visit report is located at Exhibit D.

In the site visit report regarding the November 2009 visits to the Portsmouth campus and Freeport location, the Board found that although the Freeport location continues to be in overall compliance with Board standards, recent developments at RUSM call into question the school’s overall compliance with Board standards. See *id.* The Board informed RUSM that it would conduct a site visit of the Portsmouth campus and Freeport location in November 2010 to focus primarily on enrollment and senior management at RUSM. See *id.* The Board also notified RUSM that RUSM shall launch its full accreditation self-study no later than January 2011, to prepare for its five-year accreditation renewal visit, which the Board will conduct by October 2011. See *id.* The Board directed RUSM to submit a Data Base Document, including a confidential student self-study designed and administered by the student body, to the Board by June 30, 2011. See *id.*

## 2. All Saints University

As previously reported, in early 2008 All Saints University School of Medicine (“All Saints”) initiated the accreditation process. In May 2008 the Board conducted a site visit of All Saints’ campus in Roseau, Dominica for the purpose of assessing All Saints’ compliance with the Board’s standards for certification. The site visit team determined that its visit was incomplete, due to the non-production by All Saints of certain requested information, the fact that no site visit had yet been made to the medical school’s clinical program and sites, and certain other significant concerns regarding the medical school. In August 2008, the Board requested to meet with All Saints representatives. Although All Saints indicated that it intended to respond to the Board, it has yet to do so, and All Saints has not otherwise pursued accreditation by communicating with the Board. The Board is considering, in consultation with the Government of Dominica, the status of All Saints’ operations in Dominica.

## 3. Additional meetings

As recommended in the November 2009 site visit report for the RUSM Portsmouth campus and Freeport location, Board Chairman Shillingford met with the RUSM Board and representatives of RUSM's parent company, DeVry Inc., on February 19 and April 24, 2010, respectively, to discuss the report's findings and recommendations.

#### 4. Clinical site visits

The reports for the Board visits to RUSM clinical sites are at Exhibit E.

#### 5. Training

No training took place during the reporting period. Experienced and well-qualified visitors were engaged for site visits that occurred during the reporting period. On June 17-18, 2010, the Board will hold a workshop for its members on the accreditation process. The workshop leaders will be Lindsey C. Henson, M.D., Ph.D., Vice Dean for Education, University of Minnesota Medical School, and Thomas R. Viggiano, M.D., M.Ed., Associate Dean, Faculty Affairs, Mayo Clinic College of Medicine.

#### 6. Developments in Dominica's laws or accreditation standards

Since Dominica's last report to NCFMEA, no developments have occurred with respect to Dominica's laws and regulations that affect accreditation of medical schools or with respect to Dominica's accreditation standards, processes or procedures that are used to evaluate and accredit medical schools.

The Board is unsure whether the NCFMEA would like information on upcoming accreditation activities or the specific qualifications of Board members. The Board would be pleased to supply such information if it is wanted.

### **Analyst Remarks to Narrative**

Dominica provided information and documentation regarding the accreditation activities of the Medical Board of Dominica (Board). Specifically, the Board provided information and documentation concerning a site visits to the Freeport, The Bahamas and Portsmouth, Dominica campuses of Ross University School of Medicine (RUSM), interaction with All Saints University School of Medicine (All Saints), and the reports of clinical site visits conducted in 2009 and 2010.

With respect to the campuses of RUSM, the Board conducted site visits in November 2009 and provided a final report. The final report questioned RUSM's compliance with the Board's standards and indicated that a new site visit would occur in November 2010 to review the outstanding compliance issues. Department staff noted that the Board conducted its site visits according to its procedures and timelines. However, staff suggest that Dominica provide the more recent report concerning the November 2010 site visit to the Portsmouth, Dominica and Freeport, The Bahamas campuses of RUSM to document the

Board's accreditation process and its evaluation of RUSM's compliance with the issues identified by the Board.

With respect to All Saints, the website for All Saints indicates that it is "chartered and recognized by the Government of the Commonwealth of Dominica. The University is authorized to confer Doctor of Medicine (MD) Degree on its successful candidates," and its MD program "is periodically assessed to be in conformity with the accreditation standards of the Medical Board of Dominica." This appears incongruent with the Boards' intended course of action as outlined in its report, therefore, staff suggests that the Board be asked to address any more recent actions it may have taken with regard to All Saints University and the accuracy of the information published on All Saints' website.

## **Country Response**

### **1. Review of RUSM compliance with Dominica Standards and Procedures and related site visits**

On October 26 and 27, 2010, the Board conducted a site visit to RUSM's Portsmouth campus in Dominica. The site visit was the recommended follow-up visit to the November 2009 Board visit to RUSM's Portsmouth and Freeport campuses. See Reports of site visits to Portsmouth, Dominica campus and Freeport, Grand Bahama location in November 2009 (Exhibit D). In light of the truncation and then the elimination of RUSM's Freeport program, no site-visit by the Board to Freeport was indicated. Consistent with the Board's procedures and conflict of interest policy, the Board duly appointed a site visit team for the Portsmouth site visit. In accordance with Dominica Standards and Procedures, after providing RUSM an opportunity to respond to the site visit teams' findings, the Board accepted and adopted the site visit teams' findings and recommendations. By e-mail dated April 28, 2011, the Board transmitted the final site visit report. The final site visit report is located at Exhibit 2.

RUSM's five-year accreditation renewal visit is scheduled to occur in October 2011. Consistent with the Board's procedures and conflict of interest policy, the Board has duly appointed a site visit team. The site visit team will visit RUSM's main campus in Portsmouth, Dominica and its Fifth Semester Program in Miami, Florida.

### **2. All Saints University**

All Saints has not pursued Board accreditation, and the Board has not recognized or approved All Saints. All Saints remains chartered by the Government of the Commonwealth of Dominica ("Government"). The Government and the Board are in consultation with respect to All Saints. It has been recently reported in the Dominica press, although the Board has not verified the report, that All Saints intends to depart Dominica.

### **3. Additional meetings**

In December 2010, the Board Chairman, a site visitor who attended the 2010 site visits, and counsel to the Board met with members of the RUSM board and officials of RUSM and its parent company. In October 2010, the Board Chairman and counsel to the Board met with RUSM officials. The purpose of these meetings was to discuss matters related to changes in the Ross University board bylaws and to address concerns related to RUSM's compliance with the Board's governance and administration standards.

#### 4. Clinical site visits

The reports for the Board visits to RUSM clinical sites since June 1, 2010 are at Exhibit 3.

#### 5. Training

Experienced and well-qualified visitors were engaged for site visits that have occurred since June 1, 2010. On June 17-18, 2010, the Board held as planned a workshop for its members on the accreditation process. The workshop leaders were Lindsey C. Henson, M.D., Ph.D., then Vice Dean for Education, University of Minnesota Medical School (now Vice Dean for Medical Education and Student Affairs, Charles E. Schmidt College of Medicine at Florida Atlantic University), and Thomas R. Viggiano, M.D., M.Ed., Associate Dean, Faculty Affairs, Mayo Clinic College of Medicine.

#### 6. Developments in Dominica's laws or accreditation standards

Since June 1, 2010, no developments have occurred with respect to Dominica's laws and regulations that affect accreditation of medical schools or with respect to Dominica's accreditation standards, processes or procedures that are used to evaluate and accredit medical schools.

### **Analyst Remarks to Response**

Dominica provided information and documentation regarding the accreditation activities of the Medical Board of Dominica (Board). Specifically, the Board provided information and documentation concerning a site visit to the Portsmouth, Dominica campus of Ross University School of Medicine (RUSM), All Saints University School of Medicine (All Saints), and the reports of clinical site visits conducted since June 1, 2010.

With respect to RUSM, the Board conducted a site visit in October 2010 and provided a final report. The final report indicated that five of the six recommendations from the November 2009 site visit were addressed, leaving only one outstanding issue. The Board indicated that the outstanding compliance issue would be reviewed as part of the five-year accreditation renewal visit scheduled for October 2011. Department staff noted that the Board conducted its site visits according to its procedures and timelines.

With respect to All Saints, the Board indicates that All Saints has not pursued Board accreditation and that it has not recognized or approved All Saints. In addition, the Board states that it has received information that All Saints intends to depart Dominica. However, the website for All Saints continues to indicate that it is "chartered and recognized by the Government of the Commonwealth of Dominica. The University is authorized to confer Doctor of Medicine (MD) Degree on its successful candidates," and its MD program "is periodically assessed to be in conformity with the accreditation standards of the Medical Board of Dominica." This statement is incongruent with the Boards' statements as outlined in its report. In the U.S., accrediting agencies are expected to take a proactive approach regarding the correction of any release of incorrect or misleading information. Thus far, the Board does not appear to have taken any action, therefore Department staff suggests that the Board be asked to take action with regard to All Saints and the accuracy of the information published on All Saints' website.

**Staff Conclusion: Additional Information requested**

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