

U.S. Department of Education

Staff Analysis
of the Report Submitted by

The Philippines

Prepared February 2004

Background

At its March 1999 meeting, the National Committee on Foreign Medical Education and Accreditation (NCFMEA) determined that the accreditation standards used by the Medical Education Accreditation Council (MEAC), the accrediting body that evaluates medical schools in the Philippines, were comparable to those used to evaluate programs leading to the M.D. degree in the United States.

At its September 2002 meeting, the NCFMEA was informed that the MEAC was no longer a functioning body and that the accreditation of medical schools was now being conducted by the Commission on Medical Education (CME), a review entity for medical education within the Philippine Accrediting Association of Schools, Colleges and Universities (PAASCU). Given this change, the NCFMEA expressed concern about whether the Philippines continued to have comparable standards for the accreditation of medical schools. The NCFMEA, therefore, requested that the Philippines submit a report on the accreditation activities involving Philippine medical schools since June 2002 (the date of the last report submitted by the Commission on Higher Education) and information on the standards and processes used by PAASCU to accredit Philippine medical schools for review at its March 2003 meeting. The NCFMEA also requested that one or two of its members be given an opportunity to observe PAASCU conduct an accreditation review.

At its March 2003 meeting, NCFMEA members posed questions about aspects of the standards and processes used by PAASCU in its accreditation activities, and the agency was requested to submit information in response to these questions. Although the list of outstanding issues was narrowed somewhat at the September 2003 meeting, the NCFMEA continued to raise questions to gain a better understanding of the roles and responsibilities of the various entities involved in Philippine accreditation, including the CHED, PAASCU and the CME. NCFMEA members also expressed the need for more details on PAASCU's review process to ascertain whether PAASCU's focus is on quality improvement, compliance with established standards, or both. NCFMEA voted to defer acceptance of the agency's report and again requested a detailed description of the standards and processes PAASCU uses in accrediting Philippine medical

schools. The NCFMEA also requested once again that a NCFMEA member observe an accreditation review of a Philippine medical school in order to gain firsthand knowledge of how PAASCU's standards and processes are implemented.

Summary of Findings

Although the Philippines has not provided additional documentation in response to the Secretary's letter of December 4, 2003, a number of staff-agency communications has provided some clarification to issues that have remained outstanding from previous NCFMEA meetings. After reviewing information received regarding the separate roles of CHED and PAASCU in the medical school evaluation process, staff now believes that PAASCU is the designated body that is responsible for recurrent evaluation of the quality of medical education in the Philippines.

Evidence continues to suggest, with one exception, that the agency does not have PAASCU-established standards (thresholds), but rather evaluates the extent to which medical schools achieve self-set goals and objectives within broad guidelines set by the agency. With regard to the lack of PAASCU standards demonstrating thresholds of performance, the agency points out that CHED standards do have minimum threshold expectations, and that PAASCU monitors medical school compliance with CHED standards as a "base line" of evaluation. In other words, PAASCU monitors continued compliance with CHED standards, and supplements this with an evaluation of performance with respect to self-set goals and objectives.

PAASCU states that its function is to elevate the quality of all medical education in the country using peer evaluation and a self-study process, and that it endeavors to improve the quality of any institution that has demonstrated minimum compliance with CHED operating requirements. Interestingly, the agency's performance rating system demonstrates that its accredited schools are held accountable for a moderate level of performance with respect to each of the self-set goals and objectives. Schools falling below an established level of performance risk losing accreditation if they do not demonstrate an acceptable level of performance within a reasonable period of time. Although this evaluation method leaves some concern regarding the consistency of standards from school to school, staff has reached a degree of comfort with the accountability mechanism being used to ensure compliance.

At last report, two of the medical schools in the Philippines had reached the "formal survey" stage of the PAASCU accreditation process and site visits were completed in February 2004. Due to travel advisories issued by the U.S. Department of State with regard to travel in the Philippines, NCFMEA observers were unable to attend this site visit. Tentative plans are being made for

NCFMEA to observe a subsequent site visit to take place in August or September 2004. Since the February site visits, one medical school has been accredited by PAASCU and the other awaits final deliberations by the Commission on Education and the PAASCU Board.

Despite systemic differences, particularly with regard to the lack of PAASCU-established standards, staff now believes that the Philippines has in operation a system for the evaluation and accreditation of its medical schools that is substantially comparable to the system used in the United States.

Staff Analysis

The following analysis addresses issues identified in the Secretary's December 4, 2003 letter to the Philippines that remained unresolved after the September 2003 meeting of NCFMEA. Also included are some additional issues that were addressed by the Philippines in its response to the draft staff analysis dated July 15, 2003 in preparation for the September 2003 meeting. The responses to these issues generated additional questions by staff and therefore required clarification.

PART I: The Entity Responsible for the Accreditation/Approval of Medical Schools

There should be a clearly designated body responsible for evaluating the quality of medical education in the foreign country, and that body should have clear authority to accredit/approve medical schools in the country that offer educational programs leading to the M.D. degree (or equivalent) degree.

PAASCU appears to be the designated body that is responsible for recurrent evaluation of the quality of medical education in the Philippines. Clearly, the Philippine government through CHED is actively involved in setting minimum standards for initial operation and monitoring compliance with those standards. However, in applying for voluntary accreditation through PAASCU, a medical school is aspiring to levels of performance that are more stringent and comprehensive than the minimum standards set by CHED. The PAASCU process encompasses an ongoing monitoring of performance with respect to CHED standards and other standards established by PAASCU with respect to conditions specific to individual schools. These standards fall within specific guidelines that must include mission and objectives, faculty, curriculum and instruction, clinical training/service facilities, research, students, library, administration, physical plant and other resources. Once a medical school achieves PAASCU accreditation, many of the monitoring and reporting procedures necessary for maintaining a CHED operating permit are waived. PAASCU then assumes a primary role in the ongoing review and evaluation of

the quality of medical education provided by each accredited medical school. In carrying out this function, it should be noted that PAASCU continues to monitor performance with respect to CHED standards in addition to other standards developed by PAASCU in conjunction with individual schools.

Documentation:

CHED Memorandum Order No. 36.

PART II: Accreditation/Approval Standards

1. A description of PAASCU's standards/requirements for medical schools in the areas of:

(a) faculty involvement in the admissions process;

The agency maintains that faculty members serve on admissions committees that establish admissions criteria, make selections and recommend candidates to the Dean for admission of medical students. No documentation has been provided, however, that the agency requires faculty involvement in this process.

Documentation:

Survey Instrument for Basic Medical Education, page 26.

(d) policies that prevent student exposure to infectious diseases.

Although the agency reports that schools voluntarily provide immunization services to students and instruct students in infection control measures, it does not appear that these activities are enforced by PAASCU as a result of PAASCU standards.

Documentation:

None.

2. A description of PAASCU's written criteria for assessing the adequacy of a medical school's financial resources.

The agency does not have standards addressing the adequacy of a school's financial resources. As a matter of practice, however, the chair of each visiting team is an individual with a financial management background who reviews audited financial statements and makes determinations as to whether the school has adequate resources to run its program effectively.

Documentation:

"Manual of Accreditation for Higher Education Institutions 2000," p. 45.

6. A description of the extent to which PAASCU holds its accredited medical schools accountable to PAASCU-established standards or thresholds of achievements.

Although PAASCU activities appear to be primarily designed to foster quality improvement, there is at least one standard for which the agency maintains a minimum level of expected performance below which no accreditation can be offered. In that example, graduates of medical schools on licensure examinations must be at or above the national passing rate or the school risks losing its accreditation. The agency has not provided a complete list of PAASCU standards with measurable levels of expectation, so it is not clear whether PAASCU, as a matter of policy, is holding its schools accountable to specific agency-established standards.

Rather than emphasizing compliance with individual standards, it appears that PAASCU generates a degree of accountability through its rating system. The PAASCU rating system is characterized by an assessment of school performance within subject area parameters established on the school-generated survey instrument. For example, PAASCU visitors may rate a school on its mission statement, faculty qualifications, services, facilities, etc. Although it is unclear how the agency arrives at final scores, it is apparent that a score of “3” or above in all assessment areas is considered “good” or “passing.” A rating of at least “3” is needed for accreditation.

When confronted with deterioration in academic standards, PAASCU site visit teams make recommendations that generate a process by which the school undergoes an interim focused evaluation of the deficient area, or submits progress reports to demonstrate progress in fulfilling the recommendations. If satisfactory corrective action is not taken, accreditation may be deferred.

Documentation:

PAASCU Re-Survey Visit form.