

# U.S. Department of Education

## Saba

Prepared April 2012

### **Background**

In March 2003, the National Committee on Foreign Medical Education and Accreditation (NCFMEA) first determined that Saba's standards and processes to evaluate medical education programs leading to the M.D. (or equivalent) degree are comparable to the standards of accreditation used to evaluate medical education programs in the United States. The NCFMEA last reaffirmed its determination of comparability in September 2009. At that time, the Committee also requested that Saba submit a report on its accrediting activities for review by the Committee in Fall 2011. NCFMEA meetings were subsequently held in abeyance pending reappointment of the Committee members.

The Accreditation Commission on Colleges of Medicine, or the ACCM, has been the entity responsible for evaluating the quality of medical education in Saba prior to the October 10, 2010 transition in the Netherlands Antilles, which decreed Saba a municipality of the Kingdom of the Netherlands. The ACCM continues to accredit Saba and has submitted this report on the country's behalf.

This analysis provides a review of Saba's report of its accreditation activities and includes the following areas:

- Current status of medical schools
- Overview of accreditation activities
- Laws and regulations
- Standards
- Processes and procedures
- Schedule of upcoming accreditation activities.

### **Summary of Findings**

Based on its review of the report submitted by the ACCM on behalf of Saba, Department staff concludes that Saba has provided the information requested by the NCFMEA. It appears that there have been no major changes in the standards and processes that were last determined to be comparable by the NCFMEA in September 2009. Department staff also concludes that the accreditation activities during the past two years appear to be consistent with the NCFMEA guidelines.

However, a major issue reported by Saba is its recent change in status to a municipality of the Netherlands as of October 10, 2010. The NCFMEA only recognizes countries for comparability determinations, and the Netherlands is currently deemed comparable by the NCFMEA.

Subsequent to Saba's submission of its report, the Saba University School of Medicine submitted documentation from the Netherlands which states that it will recognize ACCM's current accreditation of the school during the country's transition period to acquire recognition by the Netherlands government for the Saba University School of Medicine until October 2013. Given the authorization provided by the Netherlands government, Department staff recommends that the Committee take action to remove Saba from the list of comparable countries effective October 2013.

The Netherlands is scheduled to report back to the NCFMEA on its accreditation activities in Saba at the Committee's spring 2014 meeting.

The Saba University School of Medicine is currently not participating in the Title IV program. However, the school has recently submitted an application for participation to the Office of Federal Student Aid under its current accreditation status with ACCM.

### **Staff Analysis**

#### **Current status of medical schools**

##### **Country Narrative**

The only medical school which operates on the Island Territory of Saba is Saba University School of Medicine.

Saba University School of Medicine was visited by the ACCM inspection team from March 28th thru 29th 2011. The school remains fully accredited to September 30th 2015. This report is appended as Exhibit 1.

Exhibit 1 : ACCM Interim Report on Saba University School of Medicine, 2011

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

Saba continues to accredit Saba University School of Medicine, the only medical school that operates on the Island of Saba. The ACCM conducted a site visit to the Saba University School of Medicine on March 28-29, 2011, which remains fully accredited by the ACCM to September 30, 2015.

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## **Overview of accreditation activities**

### **Country Narrative**

Accreditation activities that have taken place since September 2009 are the following in chronological order:

November 27th 2009: Full meeting of ACCM Royal Society of Medicine, London, United Kingdom.

May 28th 2010: Full meeting of ACCM Royal College of Surgeons, Dublin, Ireland.

August 4th 2010: Inspection of Wyckoff Hospital, all cores, New York, NY. Report appended.

August 6th 2010: Inspection of Administrative Offices, Saba University, Devens, MA.

November 5th thru 10th 2010: Attendance at AAMC Conference, Washington DC. Dr Peacock.

Met with members of LCME for exploratory discussions regarding future attendance at LCME workshops.

Attended meeting with regard to future recognition by ECFMG of accrediting bodies in the Caribbean region.

November 12th 2010: Full meeting of ACCM Royal Society of Medicine, London, United Kingdom.

May 27th 2011: Full meeting of ACCM Royal College of Surgeons, Dublin, Ireland.

September 20th 2011: Inspection of core rotation OB/Gyn, Holy Cross Hospital, Silver Springs, MD. Report appended.

September 21st 2011: Inspection core rotation Psychiatry, Sheppard Pratt Hospital, Baltimore, MD. Report appended.

Inspection of core rotation, Surgery, Union Memorial Hospital, Baltimore, MD. Report appended.

September 22nd 2011: Inspection core rotation Psychiatry, Spring Grove Hospital, Catonsville, MD. Report appended.

September 23rd 2011: Inspection core rotation Internal Medicine, Harbor Hospital, Baltimore, MD. Report appended.

October 19th 2011 : Inspection core rotations in Internal Medicine and Surgery,

St Mary's Hospital, Waterbury CT. Report appended

Exhibit 2 : ACCM Hospital Site Visit Reports 2010-2011

It is now the policy of ACCM to hold training sessions for all new members prior to the summer meeting, and training sessions for new Convenors are arranged as necessary. The mentoring programme for Commissioners remains in force.

Exhibit 3 : ACCM Training Sessions Agendas

Furthermore, an Education Fund has been set up in order to allow member/s to travel to relevant meetings as the need arises.

### **Analyst Remarks to Narrative**

The ACCM has provided a summary of its key activities to include full Commission meetings and inspections of core rotations in internal medicine, psychiatry, surgery, and OB/GYN. The ACCM has further noted that it has implemented a new policy to hold training sessions for all new members prior to the summer meeting, and as necessary.

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### **Laws and regulations**

#### **Country Narrative**

As stated in Interim Report 2011, the Island Territory of Saba has become independent of The Federation of the Netherlands Antilles effective 10/10/2010 and become part of the Kingdom of the Netherlands.

To our knowledge, the ACCM's agreement with Saba continues in full force and effect. As such, the ACCM continues to act on behalf of the government of Saba as its accrediting body.

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

Saba reports that it has become independent of The Federation of the Netherlands Antilles effective October 10, 2010 and is now a municipality of the Kingdom of the Netherlands.

At the NCFMEA's fall 2011 meeting, the Netherlands reported that in 2008, its accrediting body, NVAO, performed an assessment of Saba University School of Medicine based on NVAO's accreditation framework. The Netherlands reported that the assessment of Saba University School of Medicine was a positive one; however, Department staff could not access the report based on NVAO's assessment (see transcript excerpt below). The Netherlands also reported that if Saba University School of Medicine were to submit an application for accreditation by January 2012, the NVAO would reasonably complete the accreditation and recognition process by October 2013.

Correspondence from the Saba University School of Medicine to the NVAO (attached below), indicates that the school formally requested initial accreditation by NVAO on September 26, 2011, and states the school's commitment to submit an application dossier to the NVAO before the end of the year.

Therefore, the Committee requested that the Netherlands provide an update on the status of accreditation processes for medical schools on islands in the former Netherlands Antilles (to include Saba) for the spring 2014 NCFMEA meeting.

Subsequent to Saba's submission of its report to the NCFMEA, the Saba University School of Medicine submitted documentation from the government of the Netherlands (attached below) which authorizes ACCM to continue its accreditation of Saba University School of Medicine through the transition period to NVAO accreditation which the school must acquire by October 2013. Given the authorization provided by the Netherlands government, the Committee may wish to take action to remove Saba from the list of comparable countries effective October 2013.

The ACCM reports no other changes in laws and regulations that affect the accreditation of medical schools.

## **Country Response**

In response to the draft Staff Analysis, the ACCM exhibits a letter dated February 3, 2012 from the Netherlands Ministry of Education Culture and Science confirming that the current accreditation arrangements between Saba and the ACCM remain authorized until October 2013. (Exhibit 9 – Dutch Ministry of Education letter 3 Feb 2012)

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## **Standards**

### **Country Narrative**

The Elements of Accreditation are reviewed on an annual basis to keep in line with LCME Guidelines. The last review took place in 2011 with a substantial change stating that in order for a student to graduate with the MD degree s/he must pass USMLE Step 2. Elements of Accreditation appended.

Exhibit 4 : ACCM Elements of Accreditation 2011, p.16

The Protocol has also been updated in 2011 requiring any school wishing to formally apply for accreditation to pay an application fee of 1,000.00 Euro non refundable.

The qualifications of a second or third inspection team member have been adjusted to allow for participation in inspections by the lay member of the Commission, a senior hospital manager with appropriate evaluation experience.

Exhibit 5 : ACCM Protocol for Accreditation 2011 incl Appendix A, pp.8,9

### **Analyst Remarks to Narrative**

The ACCM reports that it has recently conducted a review of its standards in 2011 that yielded a significant change of requiring passage of the USMLE Step 2 exam in order to graduate with an MD degree.

Other changes to ACCM's protocol include the implementation of an application fee for accreditation, and adjustments to its qualifications for inspection team members to allow for lay members of the Commission, or a senior hospital manager with appropriate evaluation experience.

No other changes bearing on the accreditation standards applied to Saba's medical school were reported.

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### **Processes and procedures**

#### **Country Narrative**

Site visits to Saba University Basic Science campus are conducted every two years – the most recent being March 2011. The next visit will be in March 2013.

Regarding selection and training of individuals, the ACCM has recruited the following new Commissioners since September 2009:

Mr Philip Berman. CV appended.

Dr. John Donohoe. CV appended.

Dr. Freda Gorman. CV appended.

Dr. Hilary Sanfey. CV appended.

Sir Ian Gilmore. Accepted in writing. Will attend next meeting in May 2012. CV appended.

Dr. John Brock-Utne. Accepted in writing. Will attend next meeting in May 2012. CV appended.

Exhibits 6a, 6b, 6c, 6d, 6e, 6f - CVs of new Commissioners

With regard to the periodic re-evaluation and monitoring of the medical school, the ACCM receives a formal updated database in February each year. The school is required to answer a list of questions covering all major aspects of the governance of the school. This includes academic performance of students as well as information on Residency Match rates. The school also provides a list of Residency programs into which graduates have been accepted.

Exhibit 7 : Saba University Institutional Catalog

Any substantive changes in the status of the school are reflected in the written submission in the Database on an annual basis.

Exhibit 8 : Saba Annual Database Report 2009-10

The ACCM has specific requirements regarding conflict of interest laid down in The Protocol under heading “Independence of Commissioners” (page 6) and also under heading “Disqualified Members” (page 9).

Exhibit 5 : ACCM Protocol for Accreditation, p.6 and 9)

### **Analyst Remarks to Narrative**

The ACCM has provided current information on the most recent site visit to the medical school in March 2011, as well as information and CVs regarding the training and selection of new Commissioners since September 2009.

The ACCM has also provided information regarding the annual database report that the institution provides to the agency on an annual basis for monitoring purposes. The report includes key data such as enrollment information, USMLE pass rates, faculty assignments, curriculum assessments, and residency placements in accord with the ACCM's process for monitoring.

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### **Schedule of upcoming accreditation activities**

#### **Country Narrative**

Forthcoming activities are as follows:

Submission of Saba Update Report, April 9th thru 10th 2012, Washington DC.

Visit to Interfaith Hospital, Brooklyn, NY April 11th 2012

Visit to Brookdale Hospital, Brooklyn NY April 12th 2012

Full meeting of ACCM Royal College of Surgeons, Dublin, Ireland, May 25th 2012

### **Analyst Remarks to Narrative**

The ACCM has provided a list of its forthcoming accreditation activities to include visits to clinical sites in Brooklyn, NY in April 2012, and a full meeting of the ACCM Royal College of Surgeons in May 2012.

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