

U.S. Department of Education

Staff Analysis  
of the Annual Report  
Submitted by

**Poland**

Prepared July 2007

Background

Poland was reviewed by the National Committee on Foreign Medical Education and Accreditation (NCFMEA) in October 1997. At that meeting, the NCFMEA determined that the standards used by the Ministry of Health and Social Welfare to evaluate the medical schools in Poland were comparable to those used to evaluate programs leading to the M.D. degree in the United States.

When the country was first reviewed, the Ministry of Health and Social Welfare (MHSW) was the government entity responsible for the accreditation of medical schools; however, the MHSW relied upon the Accreditation Committee for Polish University Medical Schools (ACPUMS) to accredit medical schools. The ACPUMS is a medical accreditation body that has the full support of the Ministry but is completely independent of the Ministry. The country was reviewed by the NCFMEA for continued comparability at the September 2003 Committee meeting. At that meeting, the NCFMEA determined that Poland's accreditation process used to evaluate its medical schools continued to be comparable to those used to evaluate medical schools in the United States.

As part of their decision, the NCFMEA requested that the Ministry submit a report of its activities with respect to its accreditation of the medical schools in Poland to be reviewed by the Committee at its September 2004 meeting. That report, reviewed by the Committee at its September 2004, meeting revealed that there had been a change in the law that established a State Accreditation Committee (SAC), a government entity established by the Minister of National Education and Sport (MNES), to accredit universities including medical schools. When the NCFMEA accepted the report it requested that the Ministry provide an additional report that described its activities with regard to its accreditation of medical schools and to provide additional information clarifying the roles of the SAC and ACPUMS in accrediting medical schools.

The country provided that report and it was to be considered at September 2005 NCFMEA meeting; however, the NCFMEA suspended its meetings after the Fall 2004 meeting. During the timeframe between the last Committee meeting and

the Fall 2007 meeting the Department informed the country that it could provide additional information that would be included in its report. Poland did provide updates in 2006 and 2007 that restated much of the information provided in their 2005 response; however, new information provided by these reports has been incorporated into the analysis below.

### Summary of Findings

Based on its review of the annual report submitted by the Ministry of Health and Social Welfare, Department staff concludes that Poland has provided most of the information requested by the NCFMEA. However, the country provided little detailed information on the work of the SAC that was requested by the NCFMEA. Department staff also concludes that the country's activities during the past year appear to be consistent with the NCFMEA guidelines. The Committee may want to explore with the Polish representatives how the SAC conducts its accreditation activities as well as what standards are used to evaluate medical schools.

### Staff Analysis

#### Clarification on the Role of the Various Entities Involved in Accrediting Polish Medical Schools:

At the September 2004 Committee meeting there was some confusion regarding the responsibilities of the two Polish accrediting entities that accredited medical schools. It was evident that medical schools are accredited by the Accreditation Committee of Polish Universities of Medical Sciences (ACPUMS) and the State Accreditation Committee (SAC). The Conference of Presidents of Polish Universities of Medical Sciences established ACPUMS in 1997 to accredit the medical schools and is an independent body that is not connected to the government but from its inception has and continues to have the full support of the Ministry of Health. The Minister of National Education and Sport (MNES) established the SAC to review universities in response to a change in Polish law. The response from the country stated that the two entities were very similar but differed on two aspects.

First, the ACPUMS teams accredit the medical school against standards that the agency has developed utilizing a 4-5 member team while SAC reviews all universities offering postsecondary education within Poland. However, the report states that of a five-member SAC review team, at least one individual will be required to review the "teaching programs" within a medical school. The SAC team will also contain a member from the MNES that evaluates the staffing within a school. Documents provided by Poland show that the SAC will render a decision on the quality of professional health related programs using the terms "distinguishing", "positive", "conditional," and "negative." The documents show

the grades awarded by the SAC to dental, nursing, and health sciences programs in universities. Poland notes that those schools receiving a grade of “distinguishing” or “positive” will be reevaluated after five-years, while a “conditional” grade indicates that the school needs to address recommendations and is not awarded a period of accreditation, a “negative” grade results in the school not being allowed to continue to offer a medical program. A letter from the SAC indicated that it was enclosing a copy of a brochure that discussed its accrediting process but Department staff could not locate that brochure.

Second, ACPUMS accreditation decisions do not carry the weight of law while the SAC can recommend to the Minister of National Education and Sport that a university be closed if serious deficiencies are identified and that it remain closed until the deficiencies have been corrected. No medical school has ever been recommended by the SAC for closure.

Regarding the accreditation process of ACPUMS, the country reports that medical schools must submit a comprehensive self-assessment questionnaire that requests information on the curriculum including the didactic and clinical programs, as well as information on the administration, faculty, facilities, current and past budgets, assessment of student progress, and student services. The self-study is then reviewed by ACPUMS who then established an on-site team of four or five individuals composed of medical professionals and ACPUMS members. Upon conclusion of the team visit, the team meets with the President of the University and the Dean of the medical school’s faculty to review their initial findings and provides the school an oral presentation of the contents of the draft written report. The draft written report is forwarded to the ACPUMS who then forwards a copy of the report to the school for their comments and clarification of any inaccuracies that might exist. The final report is then brought before all the members of the ACPUMS for discussion and vote regarding whether the school should be accredited. Poland states that any members of the Committee that are associated with any medical school considered for accreditation cannot participate in the discussion or vote for that school. Accrediting actions that can be taken by the ACPUMS are: (1) to accredit the school for three or five years; and (2) to deny or remove a school’s accreditation. All accrediting decisions are forwarded to The Ministry of Health. The country’s report also notes that schools may appeal accrediting decisions to the Conference of Presidents but to date no school has requested an appeal.

ACPUMS reports that it has limited information on the accreditation process used by the SAC. It notes that the information it has received is based on two members of ACPUMS that are also members of the SAC. These individuals report that the preparation for SAC accreditation visits are not as detailed and that the focus of the visit is on the student-faculty ratio and whether that ratio complies with a state mandated ratio.

ACPUMS also states that it maintains close relations with the government by always extending an invitation to the Ministry of Health to have a representative present at all accreditation meetings and also states a Ministry representative is always present; however, the Ministry of Health representative does not participate in determining the accreditation of any medical school. Further, ACPUMS always forwards a copy of all team reports and accrediting decisions to the Department of Higher Education of the Ministry of Health for information purposes and possible use in upcoming visits to universities. The report noted that the accreditation decisions rendered by the SAC and the ACPUMS for each medical school were very similar and that this suggested that a closer collaborative relationship could be established. The report then notes that positive steps have been taken to establish a collaborative relationship between the two entities including holding meetings between these two organizations every three or four months. Poland does not anticipate that the SAC and the ACPUMS will conduct joint accreditation visits because of the differences in how each entity assesses medical schools. The country also provided a comparison of the accrediting decisions rendered by the SAC and the ACPUMS for medical schools.

The report also notes that a reorganization of the Ministries resulted in changing the name of the Ministry of Education and Science to the Ministry of Science and Higher Education; however, evaluation of higher education still rests with this Ministry. Department staff notes that this Ministry has never been mentioned in any previous report submitted by the country and therefore, staff is uncertain how this entity fits organizationally. However, the report indicates that this entity may be connected to the Ministry of Health.

Poland states that a change in the accreditation process in that medical schools are no longer provided a written copy of the draft report with the school after a site visit. The new process only allows teams to provide an oral summary of their findings to schools at the conclusion of site visits. This change came about as a result of concern voiced by some school officials who believed that the draft written report provided at the conclusion of the visit was the final report and therefore, they stated that no opportunity was provided to respond to the report.

ACPUMS also reported that it now continuously reviews the progress medical schools make in addressing accrediting recommendations and believes that this accreditation process has led to significant positive improvement in the educational program delivered through medical schools.

#### The Current Status of Medical Schools:

Poland provided a list of medical schools that are currently accredited, the number of years that each school was awarded, and the date of the next evaluation. The report shows that two schools were awarded a period of accreditation for three-years with the remaining schools accredited for five-years.

The agency stated that it has extended accreditation to 15 medical school “faculties;” however, the data provided by the country indicated that the medical schools were located in 11 universities. Department staff is uncertain why there are 15 “faculties” but only 11 medical schools; however, the staff interprets the data to mean that some universities have more than one medical school. The reports states that two of the 11 medical schools have chosen to become part of a larger university. The incorporation into larger universities has not had any affect on the medical schools regarding their structure, faculty, or course of medical studies.

Poland also provided a list of all its accredited medical schools and the current period of accreditation that each was awarded.

In its response to the draft report Poland addressed the question of why there are 15 “faculties” but only 11 medical schools. The country stated that some medical schools are large and in order to ensure that the quality of the medical program is not compromised they create two faculties of medicine with separate deans.

#### Overview of Accreditation Activities:

Poland states that the majority of its time has been devoted to reviewing the mid-term accreditation reports (halfway through the period of accreditation awarded to medical schools) submitted by medical schools that addressed recommendations made by ACPUMS as a result of their last accreditation review. Additionally, all schools must also submit a self-evaluation questionnaire at the mid-term point that provides detailed information regarding the medical school program. These reports, reviewed by teams of ACPUMS members and then presented before the entire ACPUMS membership, become the basis for how schools will be reviewed at the end of their accreditation period. After review of the mid-term reports, dates for the next accreditation visit are scheduled. The country provided an agenda of a site visit as an example of how a team carries out its work.

The report states that in 2004 two medical schools were reviewed for accreditation with one receiving accreditation for three years and the other for five years; no medical schools were accredited in 2005; in 2006 three medical schools completed the accreditation process and were awarded five year periods of accreditation and one school was accredited for a period of three years; and in 2007 two schools were awarded accreditation for five years. During the current reporting period the ACPUMS members also voted to defer an accreditation decision for 18 months for one medical that did not comply with the standards regarding program length and medical faculty staffing. Poland reported that at the end of 18 months the institution must provide a self-evaluation and undergo another site visit. The country also provided a list of all accrediting activities conducted by ACPUMS from 2004 though May of 2007. The list included activities for the fields of pharmacy and “medical analyses.” Department staff is

uncertain what “medical analyses” denotes but assumes that it refers to medical schools.

Additionally, the update states Dr. Maciej Gembicki was reappointed for a three-year term as the President of the ACPUMS and that one-third of the members of the ACPUMS left but that the positions had been filled with new members. The ACPUMS also explained in greater detail what is necessary to achieve accreditation and how a three or five-year accreditation period is determined. The agency has broken its standards into two groups, Group I consists of ten elements that must be met to be awarded accreditation; Group II consists of 31 elements and the extent to which a school complies with these elements will determine whether a school is awarded a three or five-year period of accreditation. Examples of elements contained in Group I include requiring the medical school to:

- Have a defined mission.
- Having sufficient classrooms, laboratories, and equipment to deliver a medical program of studies.
- Have sufficient faculty to deliver the medical program.

Elements contained in Group II include requiring the medical school to:

- Ensure that adequate access to the library is available to students.
- Require the faculty to be involved in teaching and scientific endeavors.
- Require the faculty to be involved in evaluating and defining the curriculum.
- Ensure that the program develops students to become independent learners.

The ACPUMS is also discussing a recommendation to utilize a clinical final examination entitled the Objective Structured Clinical Examination. The ACPUMS believes that this examination may be a reliable method for ensuring that a student is able to practice medicine. Currently, three medical schools use this examination.

There was also an update that provided information regarding the accrediting activities of the SAC; however, the report stated that the information may be incomplete. During 2005 through 2006 the SAC awarded a “positive” accreditation to five medical schools.

During the reporting period Poland stated that it also participated in or attended seminars related to higher education and/or accreditation. Further, the country reported that it participated in three seminars related to accreditation and conducted training meetings for new ACPUMS members.

### Changes to the Laws and Regulations:

There have been new regulations issued regarding standards for medical schools issued by the MNES based upon a new law that was passed. The new regulation states that the medical program must be not less than six years in length and that didactic class work must include at least 4250 hours in class work, 700 hours of practice, and 750 hours of electives and other courses dictated by the university. The new regulation increases the medical education program by an additional 200 hours. Poland provided a copy of the new law that provides a detailed breakdown of the 5700 hours into various subcomponents.

The report also points to a section of the new law which allows the SAC to collaborate with other local accreditation bodies. Poland states that this provides a legal basis for the establishment of the ACPUMS.

The new law also provides guidelines on whether schools can be called universities. Currently, only one medical school holds the title of university; however, under the new law it is anticipated that additional medical schools will begin the process to change their name to be called a university.

### Changes to the Standards:

Poland reported that it changed its standards regarding how students are admitted to medical schools. The country reports that instead of reviewing graded examinations at the conclusion of high school in the fields of physics, chemistry, biology and foreign language; the country will now take a high school final examination and medical schools will review that grade; however, emphasis will be placed on how well students performed on the four subject areas previously mentioned. Additionally, an effort was initiated to require all students to take a test that evaluates a student's "predisposition for medical studies" that was to be administered by the Center for Medical Examinations (CME). However, Poland reports that this test has now been discontinued.

Further, the new law required the ACPUMS to change its standards to reflect that the title of the head of a medical school be changed from Administrative Director to Chancellor of the university. The duties of the new position are very similar to the old position; however, the Chancellor will have a greater responsibility for developing and implementing the objectives of the university. The new law also allows medical schools to accept students that previously had not been able to attend. These students are not funded by the government and must pay for their medical education. Department staff interprets the agency's response to mean that previously all students were funded by the government and therefore, enrollment was limited by the funds allocated by the government to cover educational costs.

### Changes to Accreditation Processes and Procedures:

The country notes that the only significant change that has occurred during the reporting period is the implementation of an examination (State Medical Examination) administered to medical school graduates that cover the disciplines of internal diseases, pediatrics, surgery, gynecology, family medicine, life-saving procedures, psychiatrics and bioethics. The examination was developed and administered by the CME. The country states that the State Medical Examination has been administered twice a year with a total of 2300 students taking it; however, there was no information regarding pass rates on this examination. ACPUMS reports that it is developing a collaboration with the CME with the hope that the test results can assist the ACPUMS in its accreditation process by comparing the medical education programs from schools with the highest pass rates to those with the lowest pass rates and determining if low pass rates are related to the quality of teaching delivered at the institutions. Efforts to evaluate the data have been hampered because of current funding constraints as well as the turnover in the membership of the ACPUMS. The ACPUMS is hopeful that these issues will be resolved and that they can begin implementing procedures to use the test data in the near future.

The ACPUMS also noted that it has discussed the possibility of including a short site visit as part of the report process that schools must provide at the midpoint of their accreditation period. This visit would be conducted by a small team of Committee members.

### Schedule of Upcoming Accreditation Activities:

The ACPUMS reports that it will participate in the European Association of Medical Education conference that will be held in August 2007.

Additionally, the update states that three medical schools are beginning the process of seeking renewed accreditation and that three others will be considered for reaccreditation in 2007.

There will also be continued collaboration with the SAC as well as other academic associations such as the Conference of Rectors of Academic Schools.