

## U.S. Department of Education Staff

Special Report

Prepared September 2019

### Background

The National Committee on Foreign Medical Education and Accreditation (NCFMEA) first determined at their March 1997 meeting that Ireland's standards and processes for accrediting medical schools that offer programs leading to the Medical Doctorate degree (M.D.), or equivalent degree, were comparable to those used in the United States. The NCFMEA reaffirmed Ireland's determination of comparability in September 2009. The NCFMEA also reviewed and accepted status reports on Ireland's accrediting activities in April 2013. In April 2013 the NCFMEA determined that the country's system for accrediting medical schools continued to be comparable to that used in the United States.

The Committee requested that Ireland submit an application for redetermination of comparability in 2018. At that time, the Committee determined that it needs additional information in order to make its decision regarding the comparability of the standards used by the Medical Council of Ireland to accredit medical schools in Ireland. This analysis is a review of the additional information and documentation requested from the Fall 2018 meeting of the NCFMEA.

### Summary of Findings

Additional information is requested for the following questions. These issues are summarized below and discussed in detail under the Staff Analysis section.

--The NCFMEA may wish to obtain clarification from the country regarding accountability for and the responsibility of the success of US students attending medical education programs at its overseas locations within Malaysia. The country also states that it does not track or collect USMLE data for US students at the overseas locations in Malaysia, however, the NCFMEA may wish to receive clarification from the country regarding the number of students receiving Federal Student Aid at the partnership locations at the overseas locations in Malaysia.

### Staff Analysis

#### Outstanding Issues

#### One year of data for collection, review, and analysis of graduate medical education placement rates for U.S. Students.

##### **Country Narrative**

The Medical Council has developed a report to outline the process and results of the requested additional information. You will find the Report attached [Special Report Fall 2019] and any appendices referenced within the report are also attached for your reference.

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

In response to the NCFMEA request of one year of data for collection, review, and analysis of graduate medical education placement rates for U.S. Students, the country provided a report and supporting documentation on the collection of this data from their medical schools. Particularly, the country collected the requested NCFMEA data from the annual report monitoring data provided by the medical schools pursuant to its annual report process, the duties and responsibilities outlined in the Medical Practitioners Act of 2007, and the World Federation of Medical Education Standards (exhibits 2-7); however the annual report data example provided for UG as evidence is blank (exhibit 3).

Further, the country's special report provides data for all students from Irish medical schools that sat for the USMLE exam and separate data for US students that sat for the USMLE. Specifically, the special report includes data on six medical schools in Table 1; however, the country has provided a list of nine schools that the Medical Council Accredits (exhibit 8). The country notes that table 1 of the special report includes all students that sat for the USMLE and does not accurately reflect the success of US students who took the exams. Table 2 of the report, however, reflects five of the six medical school's data of the success rates for US students only on the USMLE, which demonstrated that US students' success rates on the USMLE was 8% higher at 96% than the overall success rate of for all students which was 88%, once the country completed a comparison of the data. In addition, the country acknowledges that the University College Cork did not provide the requested information in time for submission of this report. The country should provide additional information explaining when the University College Cork data will be available and provided to the NCFMEA for review.

Lastly, the country provided some recorded data on US students attending Irish medical schools, graduating and next training destination for 2018 in Table 3 of the special report (exhibit 1). The country also states that any changes to the accreditation

process cannot be implemented mid-cycle, therefore requirements to implement student performance requirements will be introduced for the next round of accreditations under the new standards in 2022 (exhibit 1).

### **Country Response**

Please see attached populated annual returns template received from University College Cork as replacement evidence to exhibit 3 (Appendix 8)

To clarify the discrepancy in the number of medical schools accredited by the Medical Council verses the number of schools that data was requested and analysed from. There are six medical schools in Ireland delivering nine programmes that are accredited by the Medical Council. In addition to this, two medical schools in Ireland have partnerships with three overseas medical schools who deliver the Irish medical degree programme. Upon satisfactory completion, these schools award their graduates with an Irish Degree. As the agency responsible for accrediting programmes of basic medical education and training, the Medical Council therefore must satisfy itself through the formal accreditation processes that programmes that lead to the award of an Irish medical degree meet the required standards for approval. The Medical Council therefore accredits the programmes of basic medical education delivered by RCSI Bahrain, RCSI Perdana, Malaysia and UCD and RCSI Malaysia Campus as well as the local governing bodies. It is the responsibility of the local governing authorities to ensure USMLE success rates are adequate for the purposes of funding of US students and not the responsibility of the Medical Council.

Please see attached updated "special report" in replacement of the originally submitted report, University College Cork had provided the data requested in time for submission of the report and data was included, however, an error was made in not removing the reference to University College Cork not submitting the information in advance of submitting to the Committee. This comment has now been removed and the full data is provided.

### **Analyst Remarks to Response**

In response to the draft staff analysis, the country provided additional documentation and clarification to the original narrative. Specifically, the country provided Appendix 8, which comprises the annual report data for the missing institution, UG, excluded in the original special report (exhibit 1). The country also provided an amended special report reflecting the new data collection from the UG submitted data (exhibit 2).

In addition, the country clarified the number of medical programs accredited by the Medical Council within Ireland and the purpose of listing data for additional medical programs. In particular, the country clarified the Ireland Medical Council's responsibility for accrediting six medical programs within Ireland and basic medical education programs at overseas partnerships outside of Ireland. Specifically, the country explained the overseas partnerships are with the School of Medicine and Medical Science at the University College of Dublin (UCD) offered in Malaysia and the Royal College of Surgeons of Ireland (RCSI) also offered in Malaysia at two separate campuses. The country further explains that RCSI offers the Irish basic medical education program at two separate campuses which requires the Irish Medical Council to be responsible for the accreditation of the medical program at both campuses. Thus, the special report reflects data from the six accredited medical programs within the country and the three separate basic medical education programs administered at the partnership locations overseas.

Lastly, the country attests that the Medical Council is responsible for the accreditation of the three Irish basic medical education programs administered at the partnership locations overseas, however, the country explains that this accreditation is handled in conjunction with the local governing bodies of the three overseas locations in Malaysia. Therefore, the local governing bodies are responsible for the USMLE success rates and funding for US students not the Irish Medical Council; however, Malaysia has not been reviewed by the NCFMEA for comparability.

**Staff Conclusion:** Additional Information requested

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