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U.S. Department of Education

Special Report for Antigua

Prepared September 2017

Background

The National Committee on Foreign Medical Education and Accreditation (NCFMEA) made an initial determination that the standards used to accredit medical education in Antigua and Barbuda were comparable to the standards used to accredit medical education in the United States at its Fall 2013 meeting. The National Accreditation Board (NAB) was established by the Accreditation Act of 2006 as the entity responsible for the accreditation of post-secondary institutions and programs of study including medical schools that offer educational programs leading to the M.D. (or equivalent) degree in Antigua and Barbuda. The Act was further amended in 2012 establishing the Caribbean Accreditation Authority for Education in Medicine and other Health Professions (CAAM-HP) as the accrediting body for medical schools leading to an M.D. degree or equivalent in Antigua and Barbuda. Medical schools wishing to operate in Antigua and Barbuda must first attain CAAM-HP accreditation prior to NAB accreditation and recommendation to the Minister of Education for approval of medical schools.

At the time of its Fall 2013 initial determination of comparability, the country was requested to provide the report of the CAAM-HP's on-site review of the American University of Antigua (AUA), as well as the country's response to the on-site review report. A redetermination of the agency was held at the Fall 2016 NCFMEA meeting. At that time, it was determined that the committee had a number of remaining questions and a request was made for a special report. The special report is the subject of this analysis.

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.

-- NCFMEA may wish to request additional clarity about licensure rates that demonstrates review and assessment of an institution for compliance relative to this guideline. []

-- NCFMEA may wish to request a completed database that includes responses to the new governance questions implemented in 2017. []

Staff Analysis

Outstanding Issues

Please respond to the status of the development of the country's new standards and evaluation procedures in the following areas: Ethics; Program design, implementation and evaluation; admissions, recruiting, medical school catalogs, publications, and advertising material;

Country Narrative

The entirety of this submission represents the Government of Antigua & Barbuda's response to the NCFMEA's follow-up requests and is subject to input from CAAM-HP. CAAM-HP has not provided input to date for the expressed reason that CAAM-HP believes Antigua & Barbuda is not current with its payment obligations to CAAM-HP. Counsel to Antigua & Barbuda understands that Antigua & Barbuda plans to address the payment matter with CAAM-HP.

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As requested by the Committee, Antigua and Barbuda is supplying a more recent version of the CAAM-HP Medical Education Database as completed by American University of Antigua ("AUA"). The full Database is provided as Exhibit 1. All of the questions asked in 2011 related to CAAM-HP Standards ED-18, ED-19, and ED-20 are reflected in the more recent database. See AUA Database Section III: Educational Programme, Exhibit 2 at pp. 36-42.

As demonstrated in the Report of a Full Accreditation Survey of the American University of Antigua College of Medicine (2014),

Exhibit 3, pp. 36-37, during its site visits, CAAM-HP reviews and assesses an institution's compliance with these Standards.

Analyst Remarks to Narrative

In response to the prior concerns from the country's last review, the country has now provided an updated medical database about AUA. While the report is not dated, there are mentions from 2013 which lends Department staff to conclude that the report is more recent than the prior submission from 2011. The database includes information that was previously asked in 2011 and information that is pertinent to the Department's guidelines relative to mission and objectives. Specifically on page 5 of the report it discusses the commitment that the institution has created to help its students be responsive to global health care needs.

In addition to the database, the country has also provided a copy of the full accreditation survey report from AUA in 2014.

Please respond to the status of the development of the country's new standards and evaluation process in the following area: monitoring and reevaluations.

Country Narrative

As requested by the Committee, Antigua and Barbuda is supplying a more recent version of the CAAM-HP Medical Education Database as completed by AUA. All of the questions asked in 2011 related to CAAM-HP Standards IS-7, ER-2, ER-3, ER-4, ER-5, ER-6, ER-7, ER-8, ER-9, ER-10, ER-11, ER-12, and ER-13 are reflected in the more recent database. See AUA Database Section I: Institutional Setting, Exhibit 4 at pp. 8-11 and AUA Database Section V: Educational Resources, Exhibit 5 at pp. 2-45.

Antigua and Barbuda also is supplying a copy of the more recent AUA self-study. See AUA Institutional Self-Study (Dec. 2013), Exhibit 6 at pp. 39-42 (responses to Questions V.A.1 through V.A.4).

As demonstrated in the Report of a Full Accreditation Survey of the American University of Antigua College of Medicine (2014), Exhibit 3, pp. 16-17, 49-53, during its site visits, CAAM-HP reviews and assesses an institution's compliance with these Standards.

Analyst Remarks to Narrative

In response to the prior concerns from the country's last review, the country has now provided an updated medical database about AUA. While the report is not dated, there are mentions from 2013 which lends Department staff to conclude that the report is more recent than the prior submission from 2011. The database includes information that was previously asked in 2011 and information that is pertinent to the Department's guidelines relative to administrative personal and authority. Specifically page 7 of the report includes information that addresses the adequacy of resources that the institution has to effectively instruct students.

In addition to the database, the country has also provided a copy of the self study report from AUA in 2013 (exhibit 6).

The Committee requested a completed medical education annual database in order to verify the responses to the questions relevant to this standard. They also requested an updated annual institutional database that is more recent to determine whether all of the questions asked in 2011 are still reflected in the current database. {Chief Academic Official, Question 1}

Country Narrative

As requested by the Committee, Antigua and Barbuda is supplying a more recent version of the CAAM-HP Medical Education Database as completed by AUA. All of the questions asked in 2011 related to CAAM-HP Standards IS-5 and IS-8 are reflected in the more recent database. See AUA Database Section I: Institutional Setting, Exhibit 4 at pp. 8, 11-12.

As demonstrated in the Report of a Full Accreditation Survey of the American University of Antigua College of Medicine (2014), Exhibit 3, pp. 16-17, during its site visits, CAAM-HP reviews and assesses an institution's compliance with these Standards.

Analyst Remarks to Narrative

In response to the prior concerns from the country's last review, the country has now provided an updated medical database about AUA. While the report is not dated, there are mentions from 2013 which lends Department staff to conclude that the report is more recent than the prior submission from 2011. The database includes information that was previously asked in 2011 and information that is pertinent to the Department's guidelines relative to the chief academic official. Specifically questions beginning on page 64 address the qualifications for the person who serves in the chief academic official role.

In addition to the database, the country has also provided a copy of the full accreditation survey report from AUA in 2014 (exhibit 3).

The Committee requested a complete medical education annual database in order to verify the responses to the questions relevant to this standard. NCFMEA also requested an updated annual institutional database that is more recent to determine whether all of the questions asked in 2011 are still reflected in the current database. {Chief Academic Official, Question 2}

Country Narrative

As requested by the Committee, Antigua and Barbuda is supplying a more recent version of the CAAM-HP Medical Education Database as completed by AUA. All of the questions asked in 2011 related to CAAM-HP Standards IS-5 and IS-8 are reflected in the more recent database. See AUA Database Section I: Institutional Setting, Exhibit 4 at pp. 8, 11-12.

As demonstrated in the Report of a Full Accreditation Survey of the American University of Antigua College of Medicine (2014), Exhibit 3, pp. 16-17, during its site visits, CAAM-HP reviews and assesses an institution's compliance with these Standards.

Analyst Remarks to Narrative

In response to the prior concerns from the country's last review, the country has now provided an updated medical database about AUA. While the report is not dated, there are mentions from 2013 which lends Department staff to conclude that the report is more recent than the prior submission from 2011. The database includes information that was previously asked in 2011 and information that is pertinent to the Department's guidelines relative to the chief academic official. Specifically page 65 of the report discusses the conversations that occur between different parts of the institution that ensure that the chief academic official is appropriate in his or her role.

In addition to the database, the country has also provided a copy of the full accreditation survey report from AUA in 2014 (exhibit 3).

The Committee requested a complete medical education annual database in order to verify the responses to the questions relevant to this standard. {Faculty}

Country Narrative

As requested by the Committee, Antigua and Barbuda is supplying a more recent version of the CAAM-HP Medical Education Database as completed by AUA. All of the questions asked in 2011 related to CAAM-HP Standards ED-1, ED-2, ED-5, ED-29, ED-31, ED-33, ED-34, FA-7, FA-8, FA-14, and FA-15 are reflected in the more recent database. See AUA Database Section III: Educational Programme, Exhibit 2 at pp. 3-6, 9-11, 51-64, 66-70 and AUA Database Section IV: Faculty, Exhibit 7 at pp. 8-10, 16-21.

As demonstrated in the Report of a Full Accreditation Survey of the American University of Antigua College of Medicine (2014), Exhibit 3, pp. 31, 33-34, 39-41, 45-48, during its site visits, CAAM-HP reviews and assesses an institution's compliance with these Standards.

Analyst Remarks to Narrative

In response to the prior concerns from the country's last review, the country has now provided an updated medical database about AUA. While the report is not dated, there are mentions from 2013 which lends Department staff to conclude that the report is more recent than the prior submission from 2011. The database includes information that was previously asked in 2011 and information that is pertinent to the Department's guidelines relative to faculty. Specifically on page 66 of the report is information documenting that the faculty is actively involved in the administrative functions of the school including setting and approving curriculum.

In addition to the database, the country has also provided a copy of the full accreditation survey report from AUA in 2014 (exhibit 3).

The Committee requested a completed medical education annual database in order to verify the responses to the questions relevant to this standard. They also requested an updated annual institutional database that is more recent to determine whether all of the questions asked in 2011 are still reflected in the current database. {Remote Sites, Question 2}

Country Narrative

As requested by the Committee, Antigua and Barbuda is supplying a more recent version of the CAAM-HP Medical Education Database as completed by AUA. All of the questions asked in 2011 related to CAAM-HP Standards ED-7, ED-35, ED-36, ED-37, ED-38, ED-39, ED-40, and ED-41 are reflected in the more recent database. See AUA Database Section III: Educational Programme, Exhibit 2 at pp. 13-17, 70-73.

As demonstrated in the Report of a Full Accreditation Survey of the American University of Antigua College of Medicine (2014),

Exhibit 3, pp. 34, 41-42, during its site visits, CAAM-HP reviews and assesses an institution's compliance with these Standards.

Analyst Remarks to Narrative

In response to the prior concerns from the country's last review, the country has now provided an updated medical database about AUA. While it does not have a date on the report, there are mentions from the year 2013 which lends Department staff to conclude that it is more recent than the prior submission from 2011. The database includes information that was previously asked in 2011 and information that is pertinent to the Department's guidelines relative to site visits.

However, no information is entered on page 70 of the database for requirements ED-35 and ED-36 which the country references in its response. Therefore Department staff is not able to conclude if a review of the remote sites has occurred or not. NCFMEA may wish to ask for additional information regarding the review of these sites.

In addition to the database, the country has also provided a copy of the survey report from AUA in 2014 (exhibit 3).

Country Response

CAAM-HP has a practice of reviewing the remote sites utilized by AUA for clinical instruction. Please see Exhibit A, which lists those clinical sites used by AUA that have been visited by CAAM-HP at various times since October 2011. CAAM-HP has formally documented its review of these sites. For example, CAAM-HP's most recent Full Accreditation Survey of AUA included visits to several remote sites, including: DeKalb Medical Center (Atlanta, GA); Herbert Wertheim College of Medicine (Miami, FL); Florida International University (Miami, FL); and Kingsbrook Jewish Medical Center (Brooklyn, NY). See the Report of a Full Accreditation Survey of the American University of Antigua College of Medicine (2014), Exhibit B at pp. 54 – 59 (schedule of site visit). As demonstrated in Exhibit B, pp. 41-42, during its site visits, CAAM-HP reviews and assesses an institution's compliance with its Standards applicable to geographically remote sites, including ED-35 and ED-36. In the most recent Full Accreditation Survey, CAAM-HP found AUA to be in compliance with each of ED-35 and ED-36. CAAM-HP also commented on the remote sites in its July 2014 Assessment of AUA, noting: "The development of a hub model of clinical sites is highly commendable and fosters good relationships of both leaders and clinical preceptors with AUA. The model promotes consistent good quality of clinical education provision as well as facilitating the social arrangements and ongoing support for students. Within the hub, there is high quality education supervision with an excellent student:preceptor ratio." See Exhibit C at pg. 3.

Analyst Remarks to Response

In response to the draft analysis, the country explains that they rely on the accreditor (CAAM-HP) to conduct visits to the clinical sites affiliated with the institution. The country has provided a list of its clinical sites (exhibit A) and a copy of an assessment report (exhibit C) that demonstrates CAAM-HP's review of the clinical sites affiliated with the institution in this country. The inclusion of the additional information addresses the previous concerns raised in the draft petition.

Staff Conclusion: Comprehensive response provided

The Committee requested a completed medical education annual database in order to verify the responses to the questions relevant to the standard. {Curriculum, Question 1}

Country Narrative

As requested by the Committee, Antigua and Barbuda is supplying a more recent version of the CAAM-HP Medical Education Database as completed by AUA. See AUA Database Section III: Educational Programme, Exhibit 2 at pp. 11-13 for responses to questions relevant to CAAM-HP Standard ED-6.

As demonstrated in the Report of a Full Accreditation Survey of the American University of Antigua College of Medicine (2014), Exhibit 3, pg. 34, during its site visits, CAAM-HP reviews and assesses an institution's compliance with this Standard.

Analyst Remarks to Narrative

In response to the prior concerns from the country's last review, the country has now provided an updated medical database about AUA. While the report is not dated, there are mentions from 2013 which lends Department staff to conclude that the report is more recent than the prior submission from 2011. The database includes information that was previously asked in 2011 and information that is pertinent to the Department's guidelines relative to curriculum. Specifically on page 11 information is shared about how the curriculum is established to create an understanding of the fundamental principles of medicine.

In addition to the database, the country has also provided a copy of the full accreditation survey report from AUA in 2014 (exhibit 3).

The Committee requested medical education annual database in order to verify the responses to the questions relevant to this standard. {Curriculum, Question 2}

Country Narrative

As requested by the Committee, Antigua and Barbuda is supplying a more recent version of the CAAM-HP Medical Education Database as completed by AUA. See AUA Database Section III: Educational Programme, Exhibit 2 at pp. 11-13, 21-27 for responses to questions relevant to CAAM-HP Standards ED-6, ED-9, ED-10, and ED-11.

As demonstrated in the Report of a Full Accreditation Survey of the American University of Antigua College of Medicine (2014), Exhibit 3, pp. 34-35, during its site visits, CAAM-HP reviews and assesses an institution's compliance with these Standards.

Analyst Remarks to Narrative

In response to the prior concerns from the country's last review, the country has now provided an updated medical database about AUA. While the report is not dated, there are mentions from 2013 which lends Department staff to conclude that the report is more recent than the prior submission from 2011. The database includes information that was previously asked in 2011 and information that is pertinent to the Department's guidelines relative to curriculum. Specifically page 21 addresses the curriculum components and asks about the inclusion of the basic and clinical sciences.

In addition to the database, the country has also provided a copy of the full accreditation survey report from AUA in 2014 (exhibit 3).

The Committee requested a complete medical annual database in order to verify the responses to the questions relevant to this standard. {Curriculum, Question 3}

Country Narrative

As requested by the Committee, Antigua and Barbuda is supplying a more recent version of the CAAM-HP Medical Education Database as completed by AUA. See AUA Database Section I: Institutional Setting, Exhibit 4 at pp. 15-16 for responses to the questions relevant to CAAM-HP Standard IS-12.

As demonstrated in the Report of a Full Accreditation Survey of the American University of Antigua College of Medicine (2014), Exhibit 3, pg. 18, during its site visits, CAAM-HP reviews and assesses an institution's compliance with this Standard.

Analyst Remarks to Narrative

In response to the prior concerns from the country's last review, the country has now provided an updated medical database about AUA. While the report is not dated, there are mentions from 2013 which lends Department staff to conclude that the report is more recent than the prior submission from 2011. The database includes information that was previously asked in 2011 and information that is pertinent to the Department's guidelines relative to curriculum. Specifically on page 15 is a discussion about opportunities for student participation in scholarly activities.

In addition to the database, the country has also provided a copy of the full accreditation survey report from AUA in 2014 (exhibit 3).

Please respond to the status of the development of the country's new standards and evaluation procedures in the following areas: Student Services Complaints Finances and Financial reviews;

Country Narrative

As requested by the Committee, Antigua and Barbuda is supplying a more recent version of the CAAM-HP Medical Education Database as completed by AUA. See AUA Database Section III: Educational Programme, Exhibit 2 at pp. 3-9, 43, 47-49, 51-64, 66-68, 73-75 and AUA Database Section IV: Faculty, Exhibit 7 at pp.17-19 for responses to the questions relevant to CAAM-HP Standards ED-1, ED-2, ED-3, ED-22, ED-26, ED-29, ED-30, ED-31, ED-33, ED-42, and FA-14.

As demonstrated in the Report of a Full Accreditation Survey of the American University of Antigua College of Medicine (2014), Exhibit 3, pp. 31-33, 39-41, 43, 47, during its site visits, CAAM-HP reviews and assesses an institution's compliance with these Standards.

Analyst Remarks to Narrative

In response to the prior concerns from the country's last review, the country has now provided an updated medical database about AUA. While the report is not dated, there are mentions from 2013 which lends Department staff to conclude that the report is more recent than the prior submission from 2011. The database includes information that was previously asked in 2011 and information that is pertinent to the Department's guidelines relative to mission and objectives. Specifically throughout the report there are several sections that describe faculty's role in helping to define the objectives of its educational programs.

In addition to the database, the country has also provided a copy of the full accreditation survey report from AUA in 2014 (exhibit 3).

Please respond to the status of the development of the country's new standards and evaluation procedures in the following areas: Conflict-of-interest standards; site visits and clinical site reviews

Country Narrative

As requested by the Committee, Antigua and Barbuda is supplying a more recent version of the CAAM-HP Medical Education Database as completed by AUA. All of the questions asked in 2011 related to CAAM-HP Standards ED-1, ED-5, ED-29, ED-33, and FA-14 are reflected in the more recent database. See AUA Database Section III: Educational Programme, Exhibit 2 at pp. 3-5, 9-11, 51-52, 66-68 and AUA Database Section IV: Faculty, Exhibit 7 at pp.17-19.

As demonstrated in the Report of a Full Accreditation Survey of the American University of Antigua College of Medicine (2014), Exhibit 3, pp. 31, 33-34, 39-41, 47, during its site visits, CAAM-HP reviews and assesses an institution's compliance with these Standards.

Analyst Remarks to Narrative

In response to the prior concerns from the country's last review, the country has now provided an updated medical database about AUA. While the report is not dated, there are mentions from 2013 which lends Department staff to conclude that the report is more recent than the prior submission from 2011. The database includes information that was previously asked in 2011 and information that is pertinent to the Department's guidelines relative to mission and objectives. Specifically the report asks questions about ensuring that the educational objectives are adopted by the faculty.

In addition to the database, the country has also provided a copy of the full accreditation survey report from AUA in 2014 (exhibit 3).

Please respond to the status of the development of the country's new standards and evaluation procedures in the following areas: Substantive Changes; and monitoring and reevaluations.

Country Narrative

As requested by the Committee, Antigua and Barbuda is supplying a more recent version of the CAAM-HP Medical Education Database as completed by AUA. All of the questions asked in 2011 related to CAAM-HP Standards ED-1, ED 31, and ED-42 are reflected in the more recent database. See AUA Database Section III: Educational Programme, Exhibit 2 at pp. 3-5, 53-64, 73-75.

As demonstrated in the Report of a Full Accreditation Survey of the American University of Antigua College of Medicine (2014), Exhibit 3, pp. 31, 40, 43, during its site visits, CAAM-HP reviews and assesses an institution's compliance with these Standards.

Analyst Remarks to Narrative

In response to the prior concerns from the country's last review, the country has now provided an updated medical database about AUA. While the report is not dated, there are mentions from 2013 which lends Department staff to conclude that the report is more recent than the prior submission from 2011. The database includes information that was previously asked in 2011 and information that is pertinent to the Department's guidelines relative to mission and objectives. Specifically the report includes a review of the objectives of the educational program.

In addition to the database, the country has also provided a copy of the full accreditation survey report from AUA in 2014 (exhibit 3).

Please respond to the status of the development of the country's new standards and evaluation process in the following areas: program design, implementation and evaluation

Country Narrative

As requested by the Committee, Antigua and Barbuda is supplying a more recent version of the CAAM-HP Medical Education Database as completed by AUA. See AUA Database Section III: Educational Programme, Exhibit 2 at pp. 3-5, 9-11, 44-45, 66-68, 73-75 and AUA Database Section VII: Continuing Professional Education, Exhibit 8 at pp.2-3 for responses to the questions relevant to CAAM-HP Standards ED-1, ED-5, ED-24, ED-33, ED-42, ED-43, CE-1, and CE-2.

As demonstrated in the Report of a Full Accreditation Survey of the American University of Antigua College of Medicine (2014), Exhibit 3, pp. 31, 33-34, 38, 41, 43, 53, during its site visits, CAAM-HP reviews and assesses an institution's compliance with these Standards.

Analyst Remarks to Narrative

In response to the prior concerns from the country's last review, the country has now provided an updated medical database about AUA. While the report is not dated, there are mentions from 2013 which lends Department staff to conclude that the report is more recent than the prior submission from 2011. The database includes information that was previously asked in 2011 and information that is pertinent to the Department's guidelines relative to mission and objectives.

While the database does collect information about the USMLE pass rates, it should be noted (see page 73) that licensure rates is not something the country considers for evaluating educational program effectiveness. The NCFMEA may wish to inquire if the country does or doesn't consider licensure rates as a measure of educational program effectiveness. The agency also did not provide enough information to demonstrate how it prepares students for licensure and to provide competent medical care .

In addition to the database, the country has also provided a copy of the survey report from AUA in 2014 (exhibit 3).

Country Response

Respectfully, the Government of Antigua and Barbuda wishes to clarify that it is not accurate to say that "licensure rates is not something the country considers for evaluating educational program effectiveness." The reference in the Draft Staff Report to "page 73" is a reference to the CAAM-HP Medical Education Database as completed by AUA to document the practices of the medical school—not the country nor CAAM-HP. In other words, AUA has reported that the medical school for its own internal purposes does not use licensure rates of graduates to evaluate the effectiveness of its educational program. The Government of Antigua and Barbuda does not take a position on whether or not it is appropriate to consider licensure rates for purposes of evaluating educational program effectiveness; the Government of Antigua and Barbuda has delegated that decision to CAAM-HP in its role as the relevant accrediting agency responsible for evaluating medical education programs in the country.

Due in part to variation in licensure requirements among the CARICOM countries, CAAM-HP has not implemented specific requirements related to licensure rates or other outcomes measures; however, CAAM-HP has several Standards that relate to various methods for evaluation of educational program effectiveness, which may in some cases include licensure rates. Standard ED-1 provides that student achievement of the medical school's educational objectives must be documented by specific and measurable outcomes (e.g., examination results, performance of graduates in residency training, performance on licensure examinations, etc.). In addition, Standard ED-42 requires medical schools to evaluate the effectiveness of the educational program by determining the extent to which its objectives have been met. Among the kind of outcome measures that serve this purpose are acceptance into residency/post-graduate programs, post-graduate performance, and practice characteristics of graduates. Standard ED-43 requires medical schools to evaluate the performance of their students and graduates from within a framework of national and international norms of accomplishment and performance within the wider health care system.

As demonstrated in the Report of a Full Accreditation Survey of the American University of Antigua College of Medicine (2014), Exhibit B, during its site visits, CAAM-HP reviews and assesses an institution's compliance with these Standards. In the most recent Full Accreditation Survey, CAAM-HP found AUA to be in compliance with each of ED-1, ED-43, and ED-43. CAAM-HP has also continued to monitor relevant measures of educational program effectiveness between site visits. In its July 2014 Assessment of AUA, CAAM-HP commented on various measures of evaluating educational program effectiveness and required that "in subsequent annual reports an outcomes analysis of graduating students should be provided; this analysis should include pass rates on the USMLE examinations, residency and internship positions obtained and where." See Exhibit C at pg. 3. See also Exhibit D, CAAM-HP July 2015 Assessment of AUA's Progress Report to CAAM-HP (seeking "clarification of statistics of first-time takers of the USMLE"), and Exhibit E, CAAM-HP July 2016 Assessment of AUA's Progress Report to CAAM-HP (commenting on "measures taken to address the attrition rate").

CAAM-HP has Standards that require a medical school to demonstrate how it prepares students for licensure and to provide competent medical care.

Standard ED-5 requires a medical school to design and its faculty to approve a curriculum that provides a general professional education and fosters in students the ability to continue to learn through self-directed, independent study throughout their professional lives.

Standard ED-24 requires the medical school faculty to establish a system for the evaluation of student achievement throughout medical school that employs a variety of measures of knowledge, skills, behaviors, and attitudes. Such evaluation should "measure not only retention of factual knowledge, but also development of the skills, behaviors, and attitudes needed in subsequent medical training." The students' ability to use data for solving problems commonly encountered in medical practice should also be evaluated. The Standard specifies that the "sole use of frequent tests which condition students to memorize details for short-term retention only is not considered a good system of evaluation to foster self-initiated learning," which is an essential objective of a program of medical education.

A medical school's faculty committee responsible for the curriculum must monitor the content provided in each discipline so that the school's educational objectives must be achieved. See Standard ED-33. The final year of the educational program should complement and supplement the curriculum so that each student will acquire appropriate competence in general medical care regardless of their subsequent career specialty. See id.

CAAM-HP asks a school to address these topics in its Database responses. See Medical Education Database Section III: Educational Programme (previously submitted as Exhibit 2) at Part B, pp. 2-4, 13-14, 19, 22-23 and Medical Education Database Section VII: Continuing Professional Education (previously submitted as Exhibit 8) at Part B, pp. 2-3. As demonstrated in the Report of a Full Accreditation Survey of the American University of Antigua College of Medicine (2014), Exhibit B, during its site visits, CAAM-HP reviews and assesses an institution's compliance with these Standards. In the most recent Full Accreditation Survey, CAAM-HP found AUA to be in compliance with each of ED-5, ED-24, and ED-33.

Analyst Remarks to Response

In response to the draft analysis, the country provides clarity to the prior analysis about the medical school in the country not collecting licensing rate. The country indicates in its narrative that the decision or choice to forgo the collection of license information was based on decision by the institution and not by CAAM-HP or the country.

The country relies on the CAAM-HP standards for measuring student effectiveness. CAAM-HP's Standard ED-1 states that student achievement of the medical school's educational objectives must be documented by specific and measurable outcomes, which may include license rate information though not required). Additionally, the country cites CAAM-HP standards for the review of curriculum for appropriateness of training medical students throughout their professional lives. CAAM-HP also reviews the student's subsequent skill sets, knowledge, behaviors, and attitudes. The country has provided assessments of CAAM-HP's review of the institution in the country relative to the effective student outcomes standards described in the narrative and previously.

However it remains unclear about the country's requirements for ensuring that its graduates qualify for license as required by this guideline. While it appears that license is sometimes a considered measure of student effectiveness by CAAM-HP, it does not appear to be consistently a requirement. It also appears that the country is not requiring the collection of license information. In an effort to ensure that students who attend medical school in Antigua are prepared for providing competent medical care, the NCFMEA may wish to ask for additional information regarding the countries evaluation of licensure rates in accreditation decisions.

Staff Conclusion: Additional Information requested

Please respond to the status of the development of the country's new standards and evaluation process in the following areas: administrations, recruiting, medical school catalogs, publications, and advertising material.

Country Narrative

As requested by the Committee, Antigua and Barbuda is supplying a more recent version of the CAAM-HP Medical Education Database as completed by AUA. See AUA Database Section I: Institutional Setting, Exhibit 4 at pg. 6 for responses to the questions relevant to CAAM-HP Standard IS-1.

As demonstrated in the Report of a Full Accreditation Survey of the American University of Antigua College of Medicine (2014), Exhibit 3, pg. 15, during its site visits, CAAM-HP reviews and assesses an institution's compliance with these Standards.

Analyst Remarks to Narrative

In response to the prior concerns from the country's last review, the country has now provided an updated medical database about AUA. While the report is not dated, there are mentions from 2013 which lends Department staff to conclude that the report is more recent than the prior submission from 2011. The database includes information that was previously asked in 2011 and information that is pertinent to the Department's guidelines relative to governance. Specifically the report includes information that asks about the medical schools legal authority to provide medical education within the country.

In addition to the database, the country has also provided a copy of the full accreditation survey report from AUA in 2014 (exhibit 3).

Please respond to the status of the development of the country's new standards and evaluation process in the following areas: student complaints

Country Narrative

As posted on the CAAM-HP website, CAAM-HP has adopted revised standards to be effective in 2018, including a revised Standard IS-4 to read as follows:

"The governing body responsible for oversight of an institution that offers a medical education programme must have and follow formal policies and procedures to avoid the impact of conflicts of interest of members in the operation of the institution and its associated clinical facilities and any related enterprises. At legally constituted meetings of an institution's board, ex-officio members of the institution's governing board, such as Directors of the Corporation owning the school and academic and administrative

officers, must constitute less than half of the representatives participating in the meeting. There must be an appropriate accountability of the management of the medical school to an ultimate responsible authority external to and independent of the school's administration. This external authority must have sufficient understanding of the medical programme to develop policies in the interest of both the medical school and the public." See Exhibit 9, Standards for the Accreditation of Medical Schools in the Caribbean Community (CARICOM) (2017).

CAAM-HP reports that this new standard was discussed at the CAAM-HP Annual General Meeting, July 27-30, 2016. The following is an extract from the draft minutes of the meeting: "There was general agreement in principle with the revised accreditation standards for medicine. The meeting agreed that the revised standards would be circulated to members with a request for any comments within two weeks. The amended standards would then be circulated to all stakeholders for comment. It was noted that the intention was to have the revised standards become effective in July 2018."

Analyst Remarks to Narrative

The country has provided information demonstrating that it has adopted a new policy regarding governance. The narrative explains that it becomes effective in July 2018. Due to the timing of this change, it remains unclear what practices or items have been put into place for the oversight of this new standard. NCFMEA may wish to ask the country questions regarding this change.

Country Response

As previously reported to the NCFMEA, revised accreditation standards were discussed at the CAAM-HP Annual General Meeting in July 2016, and at that time the body's intention was to have the revised standards become effective in July 2018. In fact, CAAM-HP Revised accreditation Standards for medical education programs were approved at CAAM-HP's Annual General Meeting held in Barbados, July 20-22, 2017, and the revised Standards (see Exhibit F) and related procedures (see Exhibit G) became effective August 1, 2017 (i.e., applications already received and "in the pipeline" prior to that date will be guided by the previous standards, and applications received after that date will be guided by the new standards). See Exhibit H, Memorandum from CAAM-HP Secretariat (July 27, 2017). CAAM-HP has developed a revised medical education database for use with the new Standards. See, e.g., Exhibit I, Medical Education Database Section I: Institutional Setting (2017) at pg. 3 (related to revised Standard IS-4).

Analyst Remarks to Response

In response to the draft analysis, the country has provided information demonstrating that it has adopted a new policy regarding governance effective in 2017. The country has revised the medical education database (exhibit I) that demonstrates that new questions that will be asked about this topic. However, due to the timing of this change, it appears as though the country is still in the process of implementing this change. NCFMEA may wish to ask for the country to report back with a completed database that demonstrates the collection of the information with responses to the newly added governance questions.

Staff Conclusion: Additional Information requested

Please respond to the status of the development of the country's new standards and evaluation process in the following areas: finances and financial reviews

Country Narrative

As requested by the Committee, Antigua and Barbuda is supplying a more recent version of the CAAM-HP Medical Education Database as completed by AUA. All of the questions asked in 2011 related to CAAM-HP Standards IS-2, IS-3, IS-4, IS-5, and IS-9 are reflected in the more recent database. See AUA Database Section I: Institutional Setting, Exhibit 4 at pp. 6-8, 12-13.

As demonstrated in the Report of a Full Accreditation Survey of the American University of Antigua College of Medicine (2014), Exhibit 3, pp. 15-17, during its site visits, CAAM-HP reviews and assesses an institution's compliance with these Standards.

Analyst Remarks to Narrative

In response to the prior concerns from the country's last review, the country has now provided an updated medical database about AUA. While the report is not dated, there are mentions from 2013 which lends Department staff to conclude that the report is more recent than the prior submission from 2011. The database includes information that was previously asked in 2011 and information that is pertinent to the Department's guidelines relative to administrative personnel and authority. Specifically the report includes a review of how the medical school must be effective and appropriate based on its mission.

In addition to the database, the country has also provided a copy of the full accreditation survey report from AUA in 2014 (exhibit 3).

Please respond to the status of the development of the country's new standards and evaluation process in the following area: site visits and clinical site reviews

Country Narrative

As requested by the Committee, Antigua and Barbuda is supplying a more recent version of the CAAM-HP Medical Education Database as completed by AUA. All of the questions asked in 2011 related to CAAM-HP Standards IS-6 and ER-2 are reflected in the more recent database. See AUA Database Section I: Institutional Setting, Exhibit 4 at pg. 8 and AUA Database Section V: Educational Resources, Exhibit 5 at pp. 2-3.

As demonstrated in the Report of a Full Accreditation Survey of the American University of Antigua College of Medicine (2014), Exhibit 3, pp. 16, 49-50, during its site visits, CAAM-HP reviews and assesses an institution's compliance with these Standards.

Analyst Remarks to Narrative

In response to the prior concerns from the country's last review, the country has now provided an updated medical database about AUA. While the report is not dated, there are mentions from 2013 which lends Department staff to conclude that the report is more recent than the prior submission from 2011. The database includes information that was previously asked in 2011 and information that is pertinent to the Department's guidelines relative to personnel and authority. Specifically the report includes a review of the chief academic officer for determining the sufficiency of resources needed to effectively run the medical education program.

In addition to the database, the country has also provided a copy of the full accreditation survey report from AUA in 2014 (exhibit 3).
