



**TO:** The Professional Practice Committee

**FROM:** Frank Muñoz

**SUBJECT:** Oversight of International Medical Schools Approved for Long-Term Clinical Clerkship Placements

**DATE:** January 24, 2011

**AUTHORIZATION(S):**

  
Summary

Issue for Decision

Should the Board of Regents approve the plan set forth in this memorandum regarding the approval of international medical schools seeking to place in long-term clinical clerkships in New York State?

Reason(s) for Consideration

Review of Policy.

Proposed Handling

This proposed plan of action is submitted to the Professional Practice Committee (PPC) for approval at its February 2011 meeting.

Procedural History

During the November and December 2010 meetings of the PPC, Deputy Commissioner Muñoz, Executive Secretary Ramos, and Roger M. Oskvig, M.D., Chair of the New York State Board for Medicine, presented a rationale for reviewing and amending the Regents regulations regarding the oversight of international medical schools seeking approval to place students in long-term clinical clerkships in New York State. The presentations before the Committee followed a series of discussions with the Study Group on International Medical Schools which led to the preliminary findings shared with the PPC in November 2010. At the PPC's January 2011 meeting, options and recommendations for future action were presented for Regents consideration. At the close of the meeting, the PPC members asked that staff return in February with a plan for the Board's approval.

## Background Information

When international medical schools seek to place their students in New York State hospitals to perform long-term clinical clerkships of more than 12 weeks, they must obtain departmental approval in accordance with section 60.2 of the Commissioner's Regulations. Currently, 14 international medical schools have been approved by the State Education Department to place students in long-term clinical clerkships in New York State. As noted in the recent discussions with the PPC, the regulations setting out the approval process were promulgated in 1981, and have not been amended since 1985. The following is a plan to update and improve the approval process and the implementing regulations.

### PLAN OF ACTION

#### **1) Promulgate Regents Rule Establishing the Oversight Committee (March 2011)**

#### **2) Appointment of Oversight Committee (April 2011)**

- a) 12 members to be appointed by the Board of Regents
- b) The Committee will consist of:
  - i) 1 Member of the Board of Regents who will serve as co-chair of the Committee along with the Chairperson of the State Board for Medicine
  - ii) 1 Chairperson of the State Board for Medicine or other member of the Medical Board as may be designated by the Chairperson, who will serve as co-chair of the Committee along with the Member of the Board of Regents
  - iii) 1 Executive Secretary of the State Board for Medicine (non-voting)
  - iv) 1 Senior Department of Health staff member recommended by that agency
  - v) 2 subject matter experts (e.g., physicians experienced in the evaluation of medical education programs)
  - vi) 2 representatives recommended by international medical schools approved by the State Education Department to place students in clinical clerkships in New York
  - vii) 2 representatives recommended by medical schools registered in New York State
  - viii) 2 representatives from hospitals that serve as sites for clinical clerkships in NYS to be recommended by associations representing hospitals

#### **3) Duties of the Oversight Committee**

- a) Gather and study existing research on relevant issues, such as workforce, demand, and trends, and utilize such information in developing recommendations
- b) Make recommendations to the Board of Regents regarding the establishment of standards to be applied in assessing applications for approval to place students in long-term clinical clerkships, including evaluation of the following factors:
  - i) Resources of the medical school, including physical and financial resources
  - ii) Faculty resources and qualifications
  - iii) Admission standards for students
  - iv) Student performance data

- v) Educational program content
  - vi) Quality and content of clinical clerkship agreements
  - vii) Effectiveness of oversight of clinical clerkships, including ratios
- c) Make recommendations to the Board of Regents regarding the establishment of the process to be followed in assessing applications for approval to place students in clinical clerkships, including recommendations concerning:
- i) Required application content
  - ii) Criteria for evaluation of application
  - iii) Determination of whether the application is sufficient to conduct a site visit
  - iv) Composition of site review team
  - v) Criteria to be applied by the site visit team
  - vi) Cycle time for completing reviews
  - vii) Duration of approval, including preliminary, probationary, or conditional approval
  - viii) The effective date for implementation of the new standards and process (not necessarily the date of adoption).
- d) Appoint an appropriate site review team for each review
- e) Make a recommendation to the Deputy Commissioner for the Office of the Professions, who will in turn make a recommendation to the Board of Regents, regarding approval of each application for approval to place students in clinical clerkships
- 4) Recommendations of the Oversight Committee** Recommendations on matters brought before the Oversight Committee that are approved by a majority of the voting members shall be conveyed to the Board of Regents in a report prepared by the Executive Secretary for the State board for Medicine. Such report shall contain the basis for the recommendation as well as a description of the arguments posed by the dissenting members after due deliberation.
- 5) Regents Review of Standards and Process Recommendations and Adoption of Commissioner's Regulations (June 2011/September 2011)**
- a) Oversight Committee recommendations on standards and process will be conveyed to the Board of Regents. If accepted by the Regents, Commissioner's Regulations will be promulgated as appropriate.
  - b) Upon adoption of such regulations regarding standards and processes based upon recommendations by the Oversight Committee, Board of Regents approval will be required for all applications from individual schools and programs.
- 6) Currently Approved Programs and Pending Applications**
- a) Until the Regents take final action on the recommendations of the Oversight Committee, including the establishment of an effective date:
    - i) Currently approved schools/programs may continue to place students in clinical clerkships.
    - ii) Students currently enrolled in approved schools/programs will continue to be able to participate in clinical clerkships in New York.

- b) Currently pending applications will be reviewed and follow up reviews of all currently approved schools will be carried out prior to reviewing any new applications.

If this plan is approved by the Board of Regents, staff will develop a Regents Rule establishing the Oversight Committee, as described above, for submission to the Board of Regents at its March 2011 meeting. Recommendations for appointment to the Committee will be sought, and the appointments to the Committee will be presented for approval by the Board of Regents in April 2011. The Committee is expected to make recommendations to the PPC on standards and process at its June 2011 meeting.

#### Recommendation

It is recommended that the Board of Regents approve the above-described plan.