

Session 28

Foreign Schools

Medical/Nursing/Veterinary

Regulatory Review

Barbara Hemelt
Joe Peterson
U.S. Department of Education



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Session Agenda

- Regulation cites for foreign medical, veterinary, and nursing Schools
- Effective dates of new regulations
- Medical Schools
- Veterinary Schools
- Nursing Schools
- For-Profit rules

2009-10 Funding Summary

- During the 2009-10 award year, foreign institutions received a total of:
 - \$928,188,857
- During the 2009-10 award year, schools with a medical program received:
 - \$711,779,469

Applicable Regulations

- 34 C.F.R. § 600.20
 - Application procedures for establishing, reestablishing, maintaining, or expanding institutional eligibility and certification
- 34 C.F.R. § 600.21
 - Updating application information
- 34 C.F.R. § 600.41
 - Termination and emergency action proceedings
- 34 C.F.R. § 600.55
 - Additional criteria for determining whether a foreign graduate medical school is eligible to apply to participate in the Direct Loan Program

<http://ecfr.gpoaccess.gov>

Applicable Regulations (New)

- On November 1, 2010, a notice in the Federal Register published new regulations for foreign institutions
 - Generally effective on July 1, 2011
 - Amendments to § 600.20, § 600.21, and § 600.55 became effective July 20, 2011
 - § 600.56(a)(4) becomes effective July 1, 2015
 - Veterinary schools must be accredited by an organization acceptable to the Department for the purpose of evaluating veterinary programs
 - § 600.57 becomes effective July 1, 2012 for foreign nursing schools that were participating in any Title IV, HEA program on August 13, 2008

Medical Schools



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Medical Schools

General Eligibility Requirements (34 CFR 600.55(a))

- Country's medical accreditor is determined comparable by the National Committee on Foreign Medical Education and Accreditation (NCFMEA)
- Medical School is accredited by the NCFMEA approved accreditor
- Medical Program contains basic science and clinical training and is at least 32 months in length
- Graduated two classes in the two most recent 12-month calendar periods

Medical Schools, cont.

General Eligibility Requirements

- Is provided in facilities adequately equipped and staffed
- Is approved by all relevant medical licensing boards and evaluating bodies
- Does not offer more than 2 electives, of more than 8 weeks, at a site located in another foreign country or the U.S., unless that location is accredited by the LCME or AOA
- Appoint faculty members with credentials that are equivalent to faculty at U.S. medical schools

Medical Schools, cont.

Satisfactory Academic Progress (34 CFR 600.55(g))

School must include as a quantitative component a maximum timeframe for students to complete the program that:

- Is no longer than 150 percent of published length of program
- Is divided into increments, not to exceed lesser of one academic year or ½ published length of program
- Include schedule established by school designating minimum percentage or work that student must complete at end of each increment to complete program with maximum timeframe

Medical Schools, cont.

Satisfactory Academic Progress

- Include specific policies defining effect of course incompletes, withdrawals, repetitions, noncredit remedial courses on satisfactory progress
- School must document educational remediation provided to assist students in making satisfactory academic progress
- School must publish all the languages in which instruction is offered

Medical Schools, cont.

Admission Criteria (34 CFR 600.55(c))

- A post-baccalaureate/equivalent medical program must require accepted U.S. students to have taken the MCAT and reported their scores
- Must determine the consent requirements for, and require the necessary consents of, all students accepted for admission for whom the school must report to enable the school to comply with the collection and submission requirements at § 600.55(d)

Medical Schools, cont.

Collection and Submission of Data (34 CFR 600.55(d))

Schools must submit to its accrediting authority by April 30 of each year –

- MCAT scores of all U.S. students admitted during the preceding calendar year
 - Accompanied with a statement of the number of times each student took the MCAT
- Percentage of students graduating during the preceding calendar year (including at least all U.S. graduates) who obtain placement in an accredited U.S. medical residency program

Medical Schools, cont.

Collection and Submission of Data

Schools must submit to ED by April 30 of each year –

- All student and graduate USMLE scores for each step/test and attempt for the preceding calendar year, together with dates students took each test, including failed tests
 - School can allow the ECFMG to provide the USMLE data directly to ED
- Citizenship rate for preceding calendar year

Medical Schools, cont.

Collection and Submission of Data

Reminder: New gainful employment (GE) regulations published on October 29, 2010 and June 13, 2011 apply to foreign institutions.

<http://ifap.ed.gov/GainfulEmploymentInfo/>

Medical Schools, cont.

Basic Science and Clinical Locations (34 CFR 600.55(h))

- No portion of a foreign medical program offered to U.S. students, other than the clinical training portion, may be outside of the country in which the main campus of the foreign medical school is located
- Clinical training sites may be in the U.S.
- Eligibility applications must list locations of all basic science and clinical sites, except clinical training sites not regularly used but chosen by individual students taking no more than two electives at the site for no more than a total of eight weeks

Medical Schools, cont.

Basic Science and Clinical Locations

In order for US students attending a clinical training program that is located in a foreign country other than the country where main campus is located or in the US, to receive Title IV funding, the clinical site:

- must be located in an NCFMEA approved comparable foreign country and
- the medical school's accreditor must have conducted an on-site evaluation and specifically approved the clinical training site and
- the clinical instruction must be offered in conjunction with medical educational programs offered to students enrolled in accredited medical schools located in that approved foreign country



Medical Schools, cont.

Basic Science and Clinical Locations

A clinical training site located in a foreign country other than the country in which the main campus is located or in the U.S. is not required to meet the requirements on the last slide (#16) if –

- Location is included in the accreditation of a medical program accredited by the LCME or the AOA; or
- No student takes more than 2 electives and the combined length of the electives does not exceed 8 weeks

Medical Schools, cont.

Clinical Training Requirements (34 CFR 600.55(e))

- Formal affiliation agreement with hospital/clinic at which all or a portion of the school's core or required clinical rotations are provided and
- Formal affiliation agreement or other written arrangements with any hospital/clinic where all or a portion of its clinical rotations that are not required are provided
 - Except locations not used regularly, but instead chosen by students who take no more than two electives at the location for no more than a total of eight weeks

Medical Schools, cont.

Clinical Training Requirements

Agreements must address the following:

- 1) Maintenance of school's standards
- 2) Appointment of faculty to the med. school staff
- 3) Design of the curriculum
- 4) Supervision of students
- 5) Evaluation of student performance
- 6) Provision of liability insurance



Medical Schools, cont.

Clinical Training Requirements

School must notify its accrediting body within one year of material changes in:

- Educational programs, including changes in clinical training programs
- The overseeing bodies and
- The formal affiliation agreements with hospitals and clinics

Medical Schools, cont.

USMLE Pass Rate Percentage (34 CFR 600.55(f))

- Effective July 1, 2010, an annual 75% pass rate is required (raised from 60%) for students and graduates who, as first time takers, took Step 1, Step 2-CS, or Step 2-CK of the medical exams administered by the ECFMG in the preceding calendar year
- Exemption for schools with a State-approved clinical training program as of January 1, 1992, and the school has continued to operate a clinical training program in at least one State that approves the program
- Exemption for Canadian Medical Schools

Medical Schools, cont.

USMLE Pass Rate Percentage

- Example of 2011 pass rate calculation:

Number of students/graduates (from the denominator) who passed Step 1

Divided by –



All students/graduates who took Step 1 for the first time during calendar year 2011

Medical Schools, cont.

USMLE Pass Rate Percentage

- Graduates = a student who graduated from the medical school during the three years preceding the year for which the calculation is performed

Medical Schools, cont.

USMLE Pass Rate Percentage

- Small number of USMLE test takers
 - Calculation would result in any step/test pass rate based on fewer than 8 students/graduates equals single pass rate based on all steps/tests combined
 - Combining results on all step/tests would result in pass rate based on < 8 step/tests results equals no pass rate for that year; results for the year combined with each subsequent year until pass rate based on at least 8 step/tests results derived



Medical Schools, cont.

Citizenship Requirements (34 CFR 600.55(f))

- At least 60% of students and graduates do not meet U.S. citizenship or residency requirements for Federal Student Aid
- Foreign medical school is exempt from the 60% citizenship percentage if institution had State-approved clinical training program as of 1/1/2008 and continues to operate such a program in at least one State that approves the program

Medical Schools, cont.

Application and Notification Procedures (34 CFR 600.20(a))

Initial participation application/reapplication

- List location of all school sites, except clinical sites not regularly used, but chosen by students taking no more than two electives at the site for no more than a total of eight weeks
- Copies of affiliation agreements with hospitals/clinics providing clinical training

Medical Schools, cont.

Application and Notification Procedures

Initial participation application/reapplication

- Proof of current medical accreditation documents from an NCFMEA comparable accreditor
- Medical accreditor's most recent on-site evaluation of clinical sites located in a foreign country other than the country in which the main campus is located or in the United States

Medical Schools, cont.

Application and Notification Procedures

Initial participation application/reapplication

- Whether school offers (1) only post-baccalaureate/equivalent programs; (2) other types of programs leading to employment as doctor of osteopathic medicine or doctor of medicine; (3) both

Note: Institution's having a post-baccalaureate/equivalent medical program must require the MCAT for admissions and report their scores to its medical accreditor

Medical Schools, cont.

Application and Notification Procedures (34 CFR 600.21(a))

Updating Application Information

- School must apply to ED and await approval to add locations that offer all or portion of school's core clinical training or required clinical rotations except locations that are accredited by the LCME or the AOA
- School must notify ED within 10 days of adding a location offering clinical rotations that are not required, except LCME or AOA accredited clinical programs, or clinical programs not used regularly but chosen by individual students taking no more than two electives at the location for not more than a total of eight weeks

Veterinary Schools



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Veterinary Schools

Eligibility Criteria to Participate (34 CFR 600.56(a))

The school provides a program of clinical and classroom instruction that is:

- Supervised closely by members of the school's faculty
- Provided in facilities adequately equipped and staffed
- Approved by all veterinary licensing boards and evaluating bodies whose views are considered relevant by ED
- Effective July 1, 2015, a foreign veterinary school must be accredited or provisionally accredited by an organization acceptable to ED

Veterinary Schools, cont.

Eligibility Criteria to Participate

- School has graduated classes during each of the two preceding twelve-month periods
- School employs faculty members whose academic credentials are equivalent of faculty members teaching at veterinary schools in the U.S.
- No portion of the *non-clinical* training is offered outside of the country where the main campus is located

Veterinary Schools, cont.

Eligibility Criteria to Participate (34 CFR 600.56(b))

- Students at for-profit schools must complete clinical training in the United States
- Students at public or private non-profit schools must complete their clinical training
 - In the country where the school's main campus is located
 - In the US or
 - Outside US/home country, if the site is accredited by AVMA or individual student takes no more than two electives at the location and the combined length of the electives do not exceed eight weeks at site



Nursing Schools



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Nursing Schools

Effective Dates of New Requirements

- July 1, 2012 for foreign nursing schools that were participating in the Title IV, HEA programs on August 13, 2008
- July 1, 2011 for all other foreign nursing schools

Nursing Schools, cont.

Eligibility of Foreign Nursing Schools to Participate (34 CFR 600.57)

- Associate degree, collegiate, or diploma school of nursing
- Agreement with U.S. hospital or U.S. accredited nursing school to require completion of clinical training in U.S.
- Graduating students receive both a degree from the accredited U.S. nursing school and the home institution
- Reimburse ED for loan defaults - cost of a loan default is the estimated future cost of collections

Nursing Schools, cont.

Eligibility of Foreign Nursing Schools to Participate

- At least a 75% pass rate on National Council Licensure Examination for Registered Nurses (NCLEX-RN). Must provide to ED, either:
 - NCLEX-RN exam results for U.S. students and graduates; or
 - NCSB reports showing percentage of U.S. students and grads who passed the NCLEX-RN in the preceding year

For-Profit Med/Vet/Nursing

For a for-profit foreign medical, veterinary, or nursing school (34 CFR 600.54(f))–

- No portion of an eligible medical or veterinary program offered may be at what would be an undergraduate level in the U.S.
- Title IV, HEA program eligibility does not extend to any joint degree program (except where allowed for nursing schools)

Contact Information

We appreciate your feedback and comments.

We can be reached at:

Barbara Hemelt

Phone: 1-202-377-4201

E-mail: Barbara.Hemelt@ed.gov

Joe Peterson

Phone: 1-202-377-3531

E-mail: Joe.Peterson@ed.gov