

## MEDICAL BOARD STAFF REPORT

DATE REPORT ISSUED: October 12, 2015  
ATTENTION: Medical Board of California  
SUBJECT: Recognition of International Medical School  
Universidad Iberoamericana School of Medicine  
STAFF CONTACT: Curtis J. Worden, Chief of Licensing

### REQUESTED ACTION AND RECOMMENDATION:

After review and discussion of the initial evaluation of the Universidad Iberoamericana School of Medicine (UNIBE), Board staff is requesting a motion to authorize the following recommendations:

- 1) Authorize a site visit team to conduct a site inspection of UNIBE and the clinical teaching hospital(s) in the Dominican Republic where the majority of UNIBE students receive clinical training.
- 2) Approve the composition of the site team, which usually includes at least one Board executive staff member, one legal counsel, one Board Member and a medical consultant.
- 3) Delegate to staff the determination of the hospital training site or sites to be evaluated.
- 4) Approve staff to move forward with an out-of-country travel request to authorize travel to the medical school and teaching hospital sites in the Dominican Republic.

### BACKGROUND AND ANALYSIS:

UNIBE is a private, non-profit institution that is fully accredited by the Dominican Republic Ministry of Higher Education. The School of Medicine was one of the first academic programs offered by the university and was founded in 1982. UNIBE also offers 15 undergraduate programs and 30 graduate programs, including but not limited to: law, engineering, education, arts, business and health sciences. This report is focusing on the School of Medicine.

The School of Medicine is a five year program. The first year is a pre-medical year and upon successful completion, the medical students start what UNIBE refers to as:

- First year of basic science
- Second year of basic science
- Third year clinical clerkships
- Fourth year clinical clerkships

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UNIBE has approximately 400 faculty who have appropriate credentials from US and European universities. UNIBE has two tracks: Regular Track (taught in Spanish); and International Track (taught in English). The majority of the students are in the Regular Track. In 2013, 253 students were enrolled in the Regular Track and 82 students in the International Track. UNIBE states both tracks require the same curriculum, the same courses, use the same labs and are required to participate in the same research and service learning programs.

UNIBE implemented a “New Educational Model” in 2007, and in 2009 UNIBE required all students to pass a basic science examination in order to progress to the clinical clerkship rotation years.

All third year clinical clerkships are conducted only in the Dominican Republic. Fourth year UNIBE students are eligible for clinical clerkship rotations in some cities in the US, Latin America, Asia and Europe. Based upon UNIBE’s July 14, 2015 response to the Board regarding where the students are doing clinical clerkship rotations, only 24 students completed clerkships in the US in the 2013-2014 academic year.

Many of the students in the International Track seek to obtain postgraduate training in Accreditation Council for Graduate Medical Education (ACGME) accredited residency programs. UNIBE requires International Track students to sit for and pass United States Medical Licensing Examinations (USMLE) Step 1, prior to starting clinical clerkships. In addition, International Track students are required to pass USMLE Steps 1, 2 CK and 2 CS in order to graduate.

The report prepared by Licensing Medical Consultant, James Nuovo , M.D., has been included for your review (pages BRD 19 - 3 through 8). Dr. Nuovo is recommending a site visit at UNIBE and the clinical clerkship teaching facilities in the Dominican Republic.

#### FISCAL CONSIDERATIONS:

In accordance with Business and Professions Code section 2089.5, the costs of conducting a site inspection are borne by the medical school applying for the Board’s recognition. These costs include all team members’ lodging, air and ground travel, costs within the guidelines allowed by the State, the medical consultant’s time and daily per diem expense, staff daily per diem expense and the Board Member’s daily per diem expense. Title 16 of the California Code of Regulations section 1314.1(e) requires the medical school to submit payment to the Board for the team’s estimated travel expenses in advance of the site visit.

Date: August 17, 2015

To: Curtis J. Worden  
Chief of Licensing  
Medical Board of California

From: Jim Nuovo, MD  
Professor & Associate Dean of Graduate Medical Education  
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RE: Evaluation of the Universidad Iberoamericana (UNIBE) School of Medicine

### **Background**

The Medical Board of California (Board) requested a review of the materials provided by the Universidad Iberoamericana (UNIBE) School of Medicine. These were submitted in pursuit of a request for the recognition of UNIBE by the Board to enable their students and graduates to participate in clinical clerkships, to enter graduate medical education programs in California and to become eligible for a license to practice medicine in California.

This report is based on my review of the documents provided to the Board and from a response by the School to additional questions posed after my review of the Self-Assessment Report.

The goal of my review was to determine if the medical education received in this program meets the requirements of current California statutes and regulations for recognition by the Medical Board of California.

### **Recommendation**

The documents that have been provided are insufficient to determine whether the Universidad Iberoamericana School of Medicine is in substantial compliance with the requirements of Business and Professions Code Sections 2089 and 2089.5 and the California Code of Regulations, Title 16, Section 1314.1.

In order to determine whether the UNIBE Program is in substantial compliance with the aforementioned statutes and regulations, I recommend that the Board consider a site visit.

### **Review**

UNIBE has been in existence since 1982. It is described as a private, non-profit institution that is fully accredited by the government of the Dominican Republic Ministry of Higher Education.

The School's mission statement is: "To achieve the development of medical professionals who will be updated with knowledge and have the capacity required to respond to the health needs of society, and promote an integral, human, ethical and innovated approach, developing leadership skills, critical attitude, and a compromise with research and continuous education."

More specifically, they state that the School aims to educate physicians who will:

1. Be able to apply medical knowledge in the prevention, diagnosis and treatment of diseases.
2. Have the analytic tools, through knowledge and the understanding of the principles of health and disease that will allow for the holistic care and treatment of individuals.
3. Respond in an ethical and competent manner to the health and medical needs of the community.
4. Be sensitive, compassionate and socially responsible.
5. Perceive the medical career as a life-long learning experience and be able to understand, design and conduct relevant research.

As a demonstration of their commitment to high academic standards, the School indicates that they will:

1. Attract students of high scholastic performance, serious approach to learning and considerable potential to benefit from and contribute to the stimulating academic environment.
2. Have the Admissions Committee carefully evaluate each applicant's personal qualities such as maturity, responsibility, and leadership abilities as well as their capacity for empathy and judgment. Serious consideration is also given to effective communication and interpersonal skills, community service and a sincere motivation for pursuing a career in medicine.

There are approximately 400 faculty with appropriate credentials from US and European universities.

The UNIBE students are eligible for clinical rotations in some cities in the US, Latin America, Asia and Europe.

Students may be enrolled in either the "Spanish-Language Program" (also known as the Regular Track) or the "English-Language Program" (also known as the International Track). The majority of the students are in the Regular Track; e.g. in 2013 there were

253 students in the Regular Track and 82 students in the International Track. The School states there is no difference in the curriculum; “both tracks are required to take the same course, the contents and methodology are the same, they use the same labs and are required to participate in the same research and service learning programs.”

Many of the students in the International Track seek residency training positions in the US after graduation. Therefore, the School has required that the International Track students sit for the USMLE examinations before starting their clinical clerkships and must pass Step 2 (CK and CS) in order to graduate.

The following is a detailed assessment of the School based on the aforementioned regulations and on their responses to the Self-Assessment Report and the additional concerns brought by this reviewer.

### **Business and Professions Code Section 2089**

Section 2089 requires the medical curriculum to extend over four years or 32 months of actual instruction. The curriculum at UNIBE is a 5-year program that is comprised on 3 semesters per year (each semester is 16 weeks duration). Therefore, the total amount of training exceeds the requirements of Section 2089; specifically, the number of hours of instruction exceeds the 4,000 hour minimum requirement in Section 2089 (total hours reported = 8,085 which includes 1,650 hours of premedical requirements).

UNIBE does require a minimum of 80% attendance; Professors obtain attendance information at the beginning of each class. At the end of the semester, an attendance report is submitted to the School by each Professor. Students with absences in excess of 20% are not able to sit for the final examination and are required to complete the course in its entirety.

The School’s curriculum includes all of the required coursework listed in Section 2089(b). The information provided in the Self-Assessment Report indicates that the goals, objectives and course content are appropriate.

The School provided information on their admissions standards. The Self-Study Report describes these admission requirements which include the following: a National Test Certificate, a High School Certificate, Health Certification and a Police Certification/Background Check. Applications are reviewed by the Admissions Committee which includes: the Academic Vice-Rector, Registrar Officer, the Dean of Students and the Admissions Director.

The School describes a policy on accepting transfer students. The policy is as follows:

“Since 2010, students can only transfer credits to the premedical component of the curriculum. The maximum number of credit hours allowed is 8.” Further, “students must start the medical component of their program at UNIBE. Therefore, no determination for placement is needed.”

### **Business and Professions Code Section 2089.5**

The documents provided by UNIBE indicate that the program provides instruction to all of the base sciences and clinical sciences coursework required in Section 2089.5 at multiple facilities. Based on the information provided, it appears that students do this training at a variety of clinical sites.

The third year clerkships combine hospital rotations with lectures on campus. Therefore, all third year rotations are conducted only in the Dominican Republic.

Item #7 in the July 14, 2015 memo to the Board provides information on the number of sites used in the Dominican Republic for the clerkships in Psychiatry, Internal Medicine, Surgery, Family Medicine, Obstetrics and Gynecology and Pediatrics/Neonatology. This information includes the number of students at each site and whether they are in the Regular Track or the International Track.

In the fourth year, students may complete clinical clerkships at a number of international sites in the US, Puerto Rico, Spain and Portugal; however, the information provided in the July 14, 2015 response letter indicates that very few students (24) have completed clerkships in the US in the 2013-2014 academic year.

As stated, UNIBE is a private non-profit institution that is accredited by the government of the Dominican Republic (Ministry of Higher Education). It is “recognized by the World Health Organization, Tribunal Examinador de Medicasos de Puerto Rico, and Spain’s Ministry of Education.” The campus is located in Santa Domingo.

The organizational structure of the School includes a Board of Trustees, Rector, Academic Board, Academic Vice-Rector, Deans, School Directors, Academic Coordinators and Department Directors. Resumes of the members of the organizational structure of the School are presented and appear appropriate. There is also a list in the Self-Assessment Report with the names of the Director of the School of Medicine, the Associate Dean for Academic Affairs and Coordinators for the Basic and Clinical Sciences. Finally, there is a Supervisor of Hospital Rotations.

There is a description of the means by which the School engages in an ongoing review of the program including documentation of the level and extent of its supervision. This is described as the “New Educational Model” which was implemented in 2007. There is a description of the evaluation process of each student. The evaluations are done on a regular basis and document completion of all components of the curriculum.

### **California Code of Regulations, Title 16, Division 13, Section 1314.1**

The medical school is a private, non-profit institution that is accredited by the government of the Dominican Republic. Its mission is to: “Develop medical

professionals with the most current knowledge and skills required to respond to today's health care necessities in society.”

The Self-Assessment Report contains extensive and a clearly defined mission statement and educational/research and service objectives.

The report includes the exact language of “broad expectations” and lists goals and objectives. The report lists the integral role of research in its mission and includes statements of its importance, nature, objectives, processes and evaluation of research in the medical education and practice of the School. The School has developed opportunities for student research as well as funding to support these activities.

The structure and content of the education program provides an adequate foundation in the basic sciences and enables students to learn the fundamental principles of medicine, to acquire critical judgment skills and to use those principles and skills to provide competent medical care. However, as noted below, a site visit will be necessary to confirm that the training in the clinical sciences is sufficient.

As required in Section 1314.1, the administration and governance system allows the institution to accomplish its objective, i.e., its statements of the items of knowledge, skills, behavior and attitude that students are expected to learn. The institution's governance gives faculty a formal role in the institution's decision-making process. Students enrolled in the program are not permitted to serve as an instructor, administrator, officer, or director of the School.

UNIBE provided a detailed description of the faculty for each course; and these documents indicate that there are an adequate number for the size of the school. There is a sufficient description of the credentials of the faculty to indicate that they are appropriately qualified to teach their specific curricular content.

There is a clear description of the governing body of UNIBE and a description of the faculty evaluation and development programs.

UNIBE has standards governing the admission requirements. There is a description of the admissions criteria, student selection and promotion processes. This description is consistent with the institution's mission and objectives. The School's policy on transfer students has been described above.

The description of the policies for Admissions and Promotion are presented in the Self-Study Report. Regarding promotion standards the School states the following:

After 2009, in order to progress to the clinical years, all students must pass a basic science examination. International Track students must pass USMLE Step 1. In order to graduate, students must have completed all coursework and internship requirements and pass a clinical skills examination. International Track students must pass USMLE Step 2 (CK and CS).

The School provides a description of its Financial Resources in the Self-Assessment Report.

The facilities available to carry out the educational mission, both basic sciences and clinical rotations, are described in this report. They appear to be adequate to achieve the stated educational goals and objectives of the basic science component of the program. I was unable to determine if the clinical facilities including the major hospitals and ambulatory care facilities are adequate. This will be an important component of a site visit; to ensure that the clinical training opportunities are adequate.

The School indicates that it is compliant with the requirement to retain student transcripts. They are kept indefinitely.

### **Summary**

Based on my review of the materials provided by the School, I feel that the Board should consider a site visit of the UNIBE Program in order to assess its compliance with the aforementioned statutes and regulations.

Thank you for the opportunity to review the materials from UNIBE.