

PROCEDURES

OF THE

CARIBBEAN ACCREDITATION

AUTHORITY

FOR

EDUCATION IN MEDICINE

AND OTHER HEALTH PROFESSIONS

CAAM-1 -- 2007

For further information, contact:
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OF THE
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VETERINARY MEDICINE**

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HISTORY

The Caribbean Accreditation Authority for Education in Medicine and other Health Professions (CAAM) was established in 2003 under the aegis of CARICOM to ensure that medical, dental, veterinary and other health professions schools in participating countries are recognised to be of international standard at the national, regional and international levels. It was decided that avenues should be explored to ensure affiliations, linkages and connections with other accrediting bodies to ensure international recognition of the accrediting authority.

SCOPE OF CAAM RESPONSIBILITY

The CAAM accredits medical, dental and veterinary education programmes of these schools located in the participating countries in the Caribbean Community (CARICOM).

OVERVIEW OF ACCREDITATION

Through accreditation, the CAAM provides assurance to medical, dental and veterinary students, graduates, the medical, dental and veterinary professions, healthcare institutions and the public that undergraduate programmes leading to qualifications in medicine, dentistry and veterinary medicine meet appropriate national and international standards for educational quality, and that the graduates have a sufficiently complete and valid educational experience. Accreditation standards and the general policies of the CAAM are described in *Standards for the Accreditation of Medical, Dental, and Veterinary Schools in the Caribbean Community*, available from the CAAM secretariat office.

Acting independently of the participating countries, the CAAM makes periodic evaluations of the medical, dental and veterinary education programmes in CARICOM countries. A list of medical, dental and veterinary schools offering CAAM accredited programmes can be obtained from the CAAM secretariat. The list is made available to the public through the CAAM web site available at **caam-hp.org** along with the date of each programme's next accreditation review.

Programmes judged by the CAAM to meet the standards of quality are designated as Accredited for a term of up to six years. Programmes judged to be not in substantial compliance with CAAM standards are designated as accredited on 'Probation'. Programmes on probation are those that on review substantially fail to meet the appropriate standards. Those never applying for accreditation, are considered 'Not Accredited'. Approved new programmes under development as well as those applying for accreditation and not meeting most of the standards are designated as 'Provisionally Accredited'.

CAAM MEMBERSHIP

Composition

The CAAM has the following membership:

- (a) three (3) persons nominated jointly by academic institutions in the Community offering training in medicine (other than dental medicine and veterinary medicine);
- (b) one (1) person nominated jointly by academic institutions in the Community offering training in dental medicine;
- (c) one (1) person nominated jointly by academic institutions in the Community offering training in veterinary medicine;
- (d) two (2) persons nominated jointly by regional organisations representing civil society;
- (e) two (2) students enrolled in training programmes in medicine at academic institutions in the Community and nominated by the institutions;
- (f) two (2) persons from outside the region who have expertise in the accreditation of training programmes in medicine or other health professions;
- (g) one person representing the Caribbean Association of Medical Councils (CAMC);
- (h) three (3) representatives, each appointed by a Contracting Party selected by the Secretary-General on a rotational basis;
- (i) the Executive Director, who shall be an ex-officio member.
- (j) where the Authority specifies which professions are to be treated as other health professions, membership of the Authority shall be extended to include:–
 - 1. two (2) persons nominated jointly by academic institutions offering training in other health professions in the Community;
 - 2. two (2) students enrolled in training programmes in other health professions in institutions in the Community nominated jointly by those institutions.

Terms of Appointment

- A. Persons referred to in paragraphs (a), (b), (c), (d), (g) and (j) sub-paragraph (1) shall be appointed for a term of three years and shall be eligible for re-appointment for a further term of three years. No such persons may be appointed for more than six consecutive years.
- B. Persons referred to in paragraph (e) and (j) sub-paragraph (2) shall be appointed for a term of one year and shall be eligible for re-appointment for another one-year term. No such persons may be appointed for more than two consecutive years.
- C. Persons referred to in paragraph (f) shall be appointed for a single term not exceeding three years.
- D. Representatives referred to in paragraph (h) shall be appointed for a term of three years.

Criteria for Membership and Member Selection

1. The members nominated pursuant to paragraph (a) and (j) sub-paragraph (1) of the membership shall currently hold, or have held, a faculty appointment at an academic institution referred to in that paragraph or otherwise have knowledge and experience in the process of accrediting programmes of study in medicine and in the appropriate other health profession.
2. The members nominated pursuant to paragraph (b) or (c) of the membership shall hold the appropriate academic qualifications, and be actively engaged in or have recent experience in the practice of their discipline.
3. The members nominated pursuant to paragraph (d) of the membership shall, by virtue of education, experience and public service, possess qualifications which enable them to provide a public perspective in evaluating programmes of study in medicine or other health professions.
4. The members nominated pursuant to paragraph (e) and (j) sub-paragraph 2 of the membership should normally be in their penultimate year of training, be in good academic standing and should be students drawn from among institutions in the Community.
5. The Secretariat shall be responsible for soliciting nominations for membership.
6. Where the institutions fail, within the time specified in the request, to nominate any person under this Article, the Secretary-General may designate such person.
7. Where a member is unable to act or resigns, the competent institutions shall nominate another person to act in the place of that member.
8. A member may resign by transmitting a written notice in that behalf to the Chairman. In the case of the Chairman, such notice should be transmitted to the Vice-Chairman.

In order to ensure the requisite impartiality to represent the public at large, members of the medical, dental, veterinary or other health professions or their spouses, persons otherwise eligible for selection as professional members, and anyone else who might be considered as sharing in the special interests of the institution being evaluated, should recuse themselves from the authority when the institution is being evaluated.

New members of the CAAM are supplied with all relevant documents and information and briefed by the secretariat on the accreditation process prior to assuming their duties. The secretariat will arrange for members an orientation session and a workshop on the interpretation of standards and the assessment of compliance.

Voting

All CAAM members are entitled to vote. Decisions of the Authority shall be made by a two-thirds majority of the members of the Authority who are eligible to vote.

A simple majority of such members of the Authority shall constitute a quorum. Where circumstances warrant, the Authority may make decisions without meeting in formal session.

OFFICERS OF THE CAAM

Chairman and Vice-Chairman

1. At its first meeting, and as required thereafter, the Authority shall elect a Chairman and Vice-Chairman, from among its members referred to in paragraph 1 (a), (b), (c), (d), (g) and (j) sub-paragraph (1.) of the membership.
2. The Chairman and Vice-Chairman shall each hold office for three years and shall be eligible for re-election.
3. The Chairman may resign from the office of Chairman by notice in writing addressed to the Vice-Chairman and the resignation shall take effect on the date of receipt of the notice.
4. The Vice-Chairman may resign from that position by notice in writing addressed to the Chairman and the resignation shall take effect on the date of receipt of the notice by the Chairman.
5. The Chairman shall preside at all meetings of the Authority and in the event of the Chairman's absence the Vice-Chairman shall preside.
6. If both the Chairman and the Vice-Chairman are absent from a meeting, the members present shall elect one of the members qualified under paragraph 1 to act as Chairman or Vice-Chairman at that meeting.

The Secretariat

The Secretariat shall comprise an Executive Director and such professional, administrative and other staff as may be required to carry out its functions.

The Executive Director shall attend and participate in all meetings of the Authority but shall have no right to vote on any matter before the Authority.

FUNCTIONS OF THE AUTHORITY

The Authority has the objectives of:

- (a) achieving and maintaining standards of excellence in programmes of education in medicine and other health professions.
- (b) establishing an efficient system of regulation in relation to the standards and quality of such programmes of education.
- (c) securing international recognition of the programmes of education in medicine and other health professions;
- (d) maintaining the confidence of the peoples of the region in the quality of medical and other health professions training offered in the region.

In pursuance of these objectives the Authority will:

- (i) determine and prescribe standards, criteria and systems for the accreditation of programmes of education in medicine and other health professions;
- (ii) select suitable persons as assessors and appoint panels of assessors;
- (iii) accredit, on the basis of the reports of the assessors, programmes of education in medicine and other health professions;
- (iv) facilitate the development of an accreditation and quality assurance ethos in the participating countries;
- (v) collaborate with professional bodies to develop training programmes designed to create a regional cadre of trained assessors;
- (vi) establish rules, guidelines and procedures in relation to the accreditation of education programmes in medicine and other health professions;
- (vii) approve arrangements and systems for accrediting programmes of education in medicine and other health professions;
- (viii) withdraw or modify, as appropriate, accreditation granted to any programme;
- (ix) establish and maintain relations with bodies outside the CARICOM region having functions in relation to accreditation and quality assurance;

Among other important functions of the Authority are:

- (a) approval of the budget of the Authority; the financial and staff regulations;
- (b) appointment of an auditor; and
- (c) determine the fees payable by institutions in connection with the accreditation of their programmes;

Committees of The Authority

The Authority may -

- establish committees of the Authority and invite persons to serve on such committees;
- delegate to such committees, the functions of the Authority specified in the instrument of delegation, provided that a person invited pursuant to sub-paragraph (a) shall not be deemed to be a member of the Authority.

FUNCTIONS OF THE SECRETARIAT

In addition to any functions which may be assigned to it by the Authority, the Secretariat shall:

- (a) conduct research on accreditation and quality assurance so as to inform the work of the Authority;
- (b) manage the accreditation cycle for programmes;
- (c) communicate with and provide guidance and advice to institutions that are engaged in or propose to be engaged in the Authority's accreditation process;
- (d) undertake or arrange for the training of persons as assessors of programmes;
- (e) provide information on the work of the Authority to the Contracting Parties, institutions providing training in medicine and other health professions and to members of the public;
- (f) maintain a record of all activities;
- (g) prepare an annual report of the Authority's work;
- (h) maintain, on behalf of the Authority, contacts with bodies outside of the CARICOM region having functions in relation to accreditation and quality assurance;
- (i) prepare the draft budget of the Authority and submit it for the consideration and approval of the Authority;
- (j) prepare and submit for the consideration and approval of the Authority, the staff regulations and financial regulations of the Authority;
- (k) prepare an annual Work Programme and present it to the Authority for approval;
- (l) service meetings of the Authority and any committee thereof.

Consultation Services

Upon request, the secretariat staff provides consultation to officials of existing medical, dental, or veterinary schools and to organisations considering the establishment of new schools. The types of services that are available include visits to institutions to meet with administrators and faculty members, meetings at the secretariat office, and phone consultations. The goal is to assist administrators and faculty members in interpreting accreditation standards and to advise them on the accreditation process. The dean of a medical, dental or veterinary school should contact the secretariat to arrange for a consultation.

The secretariat staff is also available to answer questions about the accreditation process.

Financial Provisions

1. The funds of the Authority shall comprise:
 - (a) annual contributions from the Contracting Parties;
 - (b) grant funds received from donor agencies;
 - (c) income derived from earnings for services provided by the Authority ;
 - (d) fees from institutions whose programmes are accredited by the Authority;
2. The draft budget prepared by the Secretariat shall be presented to the Authority for approval (with or without modifications). Upon approval of the draft budget, the Authority shall submit it to the Council for Human and Social Development (an organ of

the CARICOM Community) for approval.

3. The Executive Director shall cause proper accounts of the Authority to be kept and such accounts shall be audited annually by an auditor appointed by the Authority.
4. The Authority shall, within thirty (30) days of the receipt of the report of the auditor and the audited accounts of the Authority, transmit copies of the report and audited accounts to the Contracting Parties and the Council for Human and Social Development.
5. The Authority is empowered to commit provisionally and pending approval of the budget, expenditure not exceeding one-fifth (1/5) of the regular Budget of the previous year.
6. The Authority shall be exempt from income and other taxes as agreed by the contracting parties.

Liability

All persons engaged in authorised CAAM activity are protected from legal process in the agreement drawn up by the contracting parties. The CAAM possesses full legal capacity and in particular to institute and defend legal proceedings.

CONFLICT OF INTEREST AND CONFIDENTIALITY POLICIES

Conflict of Interest Guidelines

Conflict of interest guidelines and procedures are described in Appendix B. CAAM members, staff, and surveyors must sign the conflict of interest policy attesting that they will abide by its terms.

The Secretariat notifies the deans of the schools being accredited of the composition of appointed survey teams approximately three months before a scheduled visit. Deans may challenge any team member appointment for perceived conflict of interest or other cause in writing to the secretariat within two (2) weeks of receiving the notification. Final decisions regarding such perceived conflict of interest or other cause for challenge remain at the sole discretion of the CAAM secretariat or, upon their determination, at the sole discretion of the CAAM.

Confidentiality Guidelines

CAAM members, staff, and surveyors must sign a statement (Appendix C) agreeing to treat as confidential any information they receive or generate in connection with accreditation activities.

MEETINGS OF THE CAAM

Regular Meetings

1. The Authority shall convene in ordinary session at least once in every year and at other times as determined by the chair in consultation with the secretariat.
2. Decisions of the Authority shall be made by a two-thirds majority of the members of the Authority who are eligible to vote.
3. Where circumstances warrant, the Authority may make decisions without meeting in formal session.
4. Minutes of the proceedings of the Authority shall be kept in proper form.
5. The Authority shall establish its rules of procedure.

Special Meetings

Special sessions of the Authority shall be convened upon the written request of two-thirds of the members in that behalf.

Canvass of Members/Mail Ballot

The Secretariat, with the authorisation of the Chairs, may canvass the members by mail, fax, e-mail, or telephone about their opinions on issues requiring an urgent decision. Results of such a canvass will be reported fully as part of the agenda of the next meeting, with votes of the members recorded.

Actions by mail or other such written ballots require a unanimous vote.

Meeting Place

The annual meeting should be held in the participating countries in rotation at the invitation of the contracting parties.

Special or other meetings will normally be held at the location of the secretariat or at such site as determined by the Chair.

Quorum

A simple majority of members entitled to vote shall constitute a quorum.

Recusal and Voting Abstention

Members shall not vote on, and shall absent themselves from the meeting room during

consideration of schools with which there could be a perceived conflict of interest (as covered under the conflict of interest policy set forth in Appendix B). Current or recent faculty or student /graduate status, same state location (in the case of entirely local considerations), or recent formal consultation at a school constitute some of the reasons for abstention and temporary absence of members.

Attendance

The Secretariat keeps a record of attendance of all members, and reports the same to nominating parties when members are being considered for reappointment.

Observers at CAAM Meetings

Educators from participating schools, other regional or international schools, and individuals from other disciplines who are involved in education or the accreditation process, may make a request to attend a meeting of the CAAM. Requests must be made in writing to the Secretariat. The CAAM will vote on all requests to attend a meeting made by individuals who are not staff of a participating school.

Observers must agree in writing to hold all meeting materials and the results of CAAM discussions confidential. Observers will not be allowed to remove any confidential materials from the meeting.

REVIEW OF ACCREDITATION STANDARDS

The Secretariat in consultation with a subcommittee on Standards conducts a regular review of accreditation standards ensuring that all standards are reviewed on a five-year cycle (one year before full accreditation lapses). This review includes obtaining feedback on the validity and clarity of standards from the relevant constituencies of the CAAM.

PROCEDURES FOR CHANGING ACCREDITATION STANDARDS

The CAAM develops its standards for accreditation through a process of study and discussion. When substantive changes are considered, the CAAM encourages wide input from representatives of public groups, currently enrolled students, postgraduate students, faculty members, practising professionals in the discipline, professional organisations, medical, dental or veterinary schools, and teaching hospital administrations.

The procedure for changing CAAM accreditation standards is described in Appendix D.

TERM OF ACCREDITATION

An educational programme once accredited, remains accredited until the CAAM terminates the programme formally or the programme itself terminates its accreditation status. If it is brought to the attention of the CAAM that an accredited programme has ceased to exist and has not formally terminated its accreditation status, the secretariat should investigate the matter and report on the matter as soon as possible.

Accreditation does not end merely because a certain period of time has passed. Programmes typically are subject to review on a six-year cycle. The CAAM may determine that an earlier review is necessary; in that case the accreditation status does not change until a formal action is taken by the CAAM.

Withdrawal of Accreditation

In the event that the CAAM determines that accreditation should be withdrawn, the letter transmitting that decision will specify the date at which accreditation ceases. Withdrawal or other determinations other than full accreditation may be appealed using the procedures described in Appendix F '*Appeal Procedure related to Accreditation Status*'.

SURVEY PROCESS FOR ACCREDITED PROGRAMMES

Institutional Self-study

Each established school is expected to complete a self-study prior to a full accreditation survey. The CAAM's "*Guide to Institutional Self-Study*", available from the secretariat, facilitates this process.

As part of the self-study, schools complete the Medical, Dental, or Veterinary Education Database. This is an effort to elicit essential data in an efficient manner, utilising summary tables and charts that can be transferred directly to the survey report. This format permits the display of significant data in comparable format in all reports. The secretariat will periodically review and revise, if necessary, the Medical, Dental or Veterinary Education Databases, (see DATA COLLECTION BY THE CAAM, page 20).

The *Guide* contains a DRAFT SCHEDULE for carrying out the self-study process which must be completed and sent to the secretariat at least three months prior to each full accreditation survey visit. The CAAM secretariat provides this along with other essential information to team members and to the school on the duties of survey team members, the conduct of the site visit, and the writing of the report.

Opportunity for Third-Party Comment

The CAAM provides for third parties to comment on programmes undergoing review for renewal of accreditation or for provisional accreditation. Comments must be limited to the

programme's compliance with the CAAM's accreditation standards as published in '*Standards for Accreditation of ...*'. For consideration to be given to such comments, there must be a sufficient verifiable factual basis and the party must be identifiable and be prepared to appear before the CAAM. Third-party comments should be received by the CAAM secretariat before the date of the scheduled survey visit to allow for verification.

Types of Survey Visits

Accredited programmes may have the following types of survey visits:

1. *Full accreditation surveys* typically conducted every five to six years. Completion of a Medical, Dental or Veterinary Education Database and an Institutional Self-study are required prior to a full survey.
2. *Limited (focussed) accreditation surveys* may be conducted during the six-year term to focus on specific problem areas. An Institutional Self-study is not required prior to a limited survey, unless specified by the CAAM. A focussed "mini-database," with information specified by the secretariat, is prepared by the school and forwarded to the survey team six-weeks in advance of the visit.

Mandatory re-visits are a special type of limited survey, conducted to review progress made in a programme placed on probation. A focussed "mini-database" is required.

3. *Secretariat visits* are conducted by the secretariat staff at the direction of the CAAM. The purpose of a secretariat visit is fact-finding for the CAAM on specified issues.

Duration of Surveys and Survey Schedule

Full surveys, in general, are scheduled to last approximately three and one-half working days. Other types of visits, such as limited surveys or Secretariat visits are shorter. The duration of these visits is dependent on the scope of the review.

All visits should be arranged to make the most efficient use of the time of survey team members. The CAAM secretariat provides a prototype schedule for full surveys. This model schedule may be modified based on the characteristics of the school (for example, the presence of more than one campus). For limited (focussed) surveys, the schedule should reflect the areas of non-compliance with accreditation standards that the team must review.

The team secretary, in consultation with the team chair, will develop the visit schedule with the dean, after receiving and reviewing the relevant Education Database or the specified mini-database.

ACCREDITATION REVIEWS FOR DEVELOPING PROGRAMMES

Initiation of Review

A programme is evaluated for initial accreditation only at the invitation of the chief executive officer of the sponsoring institution. The CAAM secretariat is available for meetings with officials or for a consultation site visit to assist an institution with early planning.

'Standards for Accreditation ...' and this document 'Procedures....' are available from the secretariat and should be consulted for current accreditation standards and the requirements for initial, provisional accreditation.

Process for Review of Developing Programmes

Provisional accreditation. For a programme to be considered for initial provisional accreditation, the school must first pay the required fee (see FEES FOR ACCREDITATION REVIEW), complete the appropriate Education Database, and respond to any additional requests for pertinent data. These data are used to make an initial determination of the readiness of the programme to admit a first-year class, and provide the basis for a CAAM decision to schedule a survey team visit for provisional accreditation.

1. The initial provisional accreditation survey is conducted during the year prior to enrollment of the first class. Based on the completed database and the report of the survey team, the CAAM will determine whether or not to award initial provisional accreditation.
2. An interim provisional accreditation survey is conducted during the first year of the school. This survey reviews progress in the development of the programme and planning for the second year. An updated database is required. A report will be reviewed by the CAAM.
3. A second interim provisional accreditation survey is conducted during the second year of the initial class, and consists of a general review the status of the educational programme and the planning for clinical teaching in the last two years of the programme. A complete database will be required. The report will be reviewed by the CAAM.
4. A consultation survey is conducted by the Secretariat during the third year, to review progress and to assist the dean and faculty in the formation of a "problem list" to be analysed in the Institutional Self-study required for the survey for full accreditation. The Medical, Dental or Veterinary Education Database is updated. A brief report will be reviewed by the CAAM.
5. The survey for full accreditation is conducted early in the fourth year of the programme. An institutional self-study, new Medical, Dental or Veterinary Education Database, and a plan for further development of the programme are required. The CAAM will review the survey team report and database and determine if the programme should be granted full accreditation and when the next accreditation review will occur.

FEES FOR ACCREDITATION REVIEWS

Established schools seeking accreditation will pay an initial administrative fee of US \$5,000 plus a fee of US\$1,000 for each additional campus.

Accredited schools pay an annual fee of US\$1,000 for every 100 students admitted in a calendar year to the CAAM. All surveys at those schools are conducted without further administrative charge. Schools bear the costs of the survey visits, i.e. airfares, per diem and other listed expenses. The costs of survey visits will be paid in advance to the secretariat.

Schools seeking initial, provisional accreditation are required to pay the CAAM a one-time administrative fee of US\$10,000, plus reimbursement of expenses incurred by the survey team in performing surveys for provisional accreditation. The number and types of surveys involved in the provisional accreditation process are described above. Expenses for consulting visits to schools contemplating application for provisional accreditation are to be reimbursed by the sponsoring institution.

CIRCUMSTANCES THAT MAY LEAD TO AN UNPLANNED ACCREDITATION REVIEW/SURVEY VISIT

Major Changes in the Educational Programme or Educational Resources

Accreditation is awarded to a programme of medical, dental or veterinary education based on the judgment of the CAAM that there is an appropriate balance between student enrollment and the total resources of the institution, including the faculty, physical facilities, and available funding. Plans to significantly alter the educational programme; a significant change in student enrollment; or a change in institutional resources, so that the balance between enrollment and resources is altered, may trigger a request for additional written information or an unplanned accreditation review or survey visit.

Changes in Ownership or Governance; Establishment of Remote Programmes

When the CAAM is notified by institutional officials that a change in programme ownership or governance is planned (e.g., the programme is to be transferred to the auspices of another university or institution), the school is asked to supply a written report that will be reviewed by the CAAM. A limited survey visit also may be conducted. The report and the visit allow the CAAM to determine whether reasonable compliance with accreditation standards can be assured and the current status and term of accreditation continued under the new ownership or governance. The same procedures apply when a new geographically remote programme/campus is to be established.

SURVEY TEAM APPOINTMENT AND FUNCTION

Selection/Training of Surveyors

The Secretariat recruits and trains a suitable group of surveyors who are knowledgeable about medical, dental or veterinary education. The Secretariat maintains an updated roster of experienced and competent educators and practitioners in the respective disciplines from which to select appropriate *ad hoc* team members. Deans of schools are given particular consideration for team membership.

The Secretariat staff conducts accreditation orientation sessions for surveyors at times that will be publicised well in advance. In addition, interactive workshops will be offered as required for in-depth training of surveyors, focussing on the interpretation of standards and the assessment of compliance. All team secretaries and new surveyors are expected to take part in these workshops before participating in a site visit. Experienced surveyors should attend an orientation session or workshop at least once every three years.

Appointment of Survey Teams

The Secretariat is responsible for appointing survey teams. Each survey team is appointed on an *ad hoc* basis. The composition of a survey team is determined by the characteristics of the school to be visited. The secretariat includes a representative cross-section of basic science and clinical educators and practitioners in each *ad hoc* survey team. Survey teams include one member of the CAAM or of the Secretariat. Survey team appointments are in keeping with the CAAM's Conflict of Interest Guidelines (Appendix B). To avoid potential conflicts of interest, the dean of a school to be visited is asked to review the composition of the proposed survey team and to inform the secretariat of any potential problems.

Survey Team Role

Survey teams are charged to assess how well the medical, dental or veterinary education programme at the assigned school complies with accreditation standards. To accomplish this responsibility, teams make on-site observations to corroborate and evaluate data provided by the institution. The team's findings and conclusions are incorporated into a written report to the CAAM. The CAAM has sole authority, after due deliberation, to grant, withhold or modify a school's accreditation.

Survey Team Size and Composition

1. Full survey. A full survey typically involves five persons:
 - a. A chair, who has significant experience in the conduct of the appropriate education programme and in the accreditation process.
 - b. A secretary, drawn either from a cadre of experienced surveyors specially trained to assume the secretary's role, or from the full-time staff of the CAAM.

- c. Two or more members, one of whom should be a basic scientist faculty member or educational scientist and one a clinician/practitioner, unless either the chair or secretary meets those designations.
- d. A CAAM member who is an educational administrator/senior faculty member and has not previously participated in a survey visit.

2. Limited (focussed) survey.

A limited survey will be conducted by experienced surveyors and may include CAAM staff members. The limited visit team typically consists of three team members, preferably including one member who participated in the prior full survey of the school.

3. Secretariat visit.

A secretariat visit is conducted by the Executive Director or an experienced staff member.

Observers on CAAM Survey Visits

Under special arrangements, initiated or agreed to by the dean of a school scheduled for survey, one or more representatives of participating countries, a regional or international accrediting agency may be authorised to observe a CAAM survey. Individuals may serve as observers as part of their orientation to the CAAM and the accreditation process. Distinguished international educators also may be observers on survey visits by special request and after approval by the Secretariat and the school to be visited. The guidelines for participation by observers are contained in Appendix E.

Protocol for Team Members and Observers

In meetings with administrators, faculty members, and students, team members and observers should ask questions and listen to responses. Team members should remember that the primary purpose of the visit is information gathering, not consultation, and that their considerations should be independent of any personal biases or the policies of the organisation with which they are associated. Information obtained during the survey process is to be treated as strictly confidential.

Reimbursement of Expenses

The CAAM pays the expenses for all survey team members. All CAAM members, staff and other *ad hoc* team members are reimbursed according to the established CAAM travel policy.

Each team secretary not on the staff of the sponsoring associations receives a stipend of USD\$1500 for a full survey or USD\$1000 for a limited survey. Reimbursement of related secretarial/clerical costs is paid at a rate not to exceed USD\$500 for a full survey report or USD\$250 for a limited survey report.

SURVEY REPORTS

Preparation

The team secretary is expected to prepare a draft report shortly after completion of the survey visit. Portions of the report specifically assigned to individual team members should either be written on site or forwarded to the team secretary within one week after the conclusion of the site visit. The survey report contains relevant excerpts from the *Medical, Dental or Veterinary Education Database and Institutional Self-Study*, as described in the 'Guide for Writing a Report...' available from the secretariat. The final survey report also includes an assessment of the programme's performance with respect to student achievement.

Review

The draft report is sent for review to

- (1) the secretariat
- (2) each team member, and
- (3) the dean of the surveyed school.

Any necessary amendments must be returned to the team secretary, within two weeks after receipt. The dean is asked to correct any errors of fact, and discuss any disagreement with the tone or conclusions of the report to the team secretary, who should bring the matter to the attention of the team chair. If significant differences remain, the dean is invited to write a letter to the CAAM secretariat for inclusion with the materials when the report is considered by the CAAM.

After the CAAM secretariat receives the final report, it is printed and mailed to members and staff of the CAAM for the programme's accreditation status to be considered at its next scheduled meeting. Members must have had the report at least two weeks before the CAAM meeting.

CAAM ACCREDITATION ACTIONS

Action Following a Survey Visit

In general, the CAAM bases its determination on the survey report. As noted in the section on "Review" of survey reports, the school may write a letter if there is disagreement with the tone or conclusions of the report. The letter will be considered by the CAAM as it makes an accreditation decision. Information received after the date of the onsite survey also may be considered in the CAAM's deliberations when the information concerns issues that could significantly impact the accreditation status of the educational programme. If information is received from sources other than the school, it will be disclosed to the school, which will then have an opportunity to respond.

Each report of a full or limited survey under consideration by the CAAM at a regular meeting is presented briefly by two members of the CAAM who are selected by the Secretariat who have

not participated in the survey visit to the school. Following these presentations and subsequent discussion, the CAAM shall vote formally on a motion declaring the future accreditation status of the programme and any requirements for follow-up (such as one or more progress reports, a limited visit, and/or a Secretariat visit).

Progress Reports

A school may be asked to submit one or more progress reports, documenting steps taken to correct specific areas of non-compliance with accreditation standards identified in a survey report, describing the outcomes of areas that were in transition at the time of a survey visit, or responding to other CAAM questions or concerns. Progress reports will normally be discussed at the next regularly scheduled meeting of the CAAM.

After review, the CAAM may:

- (1) accept the report,
- (2) defer action pending receipt of further information, or
- (3) decline to accept a report that is deficient and request that a more complete report be submitted.

CAAM action on a progress report includes consideration and determination of the accreditation status of the programme (for example, continued full accreditation, accreditation with probation) and the required follow-up (for example, an additional progress report or a survey visit).

Reporting of CAAM Action to the Institution

Within one month of the CAAM determination a Letter/Certificate of Accreditation transmitting the accreditation decision and a copy of the survey report are sent by the Secretariat to the Vice-Chancellor/president of the university with a copy to the dean. The Letter of Accreditation contains the final CAAM determination of the programme's strengths, areas of non-compliance with accreditation standards, and areas in transition (i.e., areas of current or imminent change that may impact on the educational programme).

The draft and final survey reports and the Letter of Accreditation are held confidential by the CAAM. Since the draft survey report is an unfinished document, it should not be disclosed to the public. The final report may be disclosed by the school at its discretion. The Certificate of Accreditation, signed by the Chair and Executive Director of the CAAM may be displayed/published by the school at its discretion. Following action on a progress report, a letter will be sent to the dean of the school describing the CAAM action and any required follow-up.

In the event of a decision of probation, denial, or withdrawal of accreditation, the subject institution must notify all students enrolled, those newly accepted for enrollment, and those seeking enrollment, of this accreditation action. Such action must be carried out within three months of the receipt CAAM's determination. The school will also cease to display or publish any previous Certificate of Accreditation.

Prompt Correction of Deficiencies

Deficiencies in compliance with accreditation standards must be corrected promptly. Unless an exception is made, the specified period for correction may not exceed two years. Failure to achieve compliance within such time period constitutes grounds for CAAM action unless the period for achieving compliance is extended for good cause.

ACTIONS SUBJECT TO APPEAL

The following actions are subject to appeal: assignment of probationary status, withdrawal of accreditation, denial of accreditation, and refusal to consider for accreditation. The CAAM procedure for appeal of actions affecting accreditation is described in Appendix F.

REPORTING OF CAAM ACTIONS TO EXTERNAL GROUPS

Reporting to Contracting Parties

The Contracting Parties will be notified, through the Secretary-General of CARICOM, within one month of final accreditation actions taken at a CAAM meeting, as well as of a programme's decision to withdraw voluntarily from accreditation or to let its accreditation lapse. Any final decision to deny or withdraw provisional or full accreditation, or to place an accredited or provisionally-accredited programme on probationary status will be reported to the Secretary-General of CARICOM for transmission to the Contracting Parties and to relevant licensing and accrediting bodies at the same time as it is reported to the programme, but no later than one month after the final decision of the CAAM. In decisions to deny or terminate accreditation, the CAAM will release, on request, a summary of the facts of its review to the Secretary-General of CARICOM or a Contracting Party, along with any comments made by the programme.

Programmes believed to be engaged in fraud or abuse, will be reported to the Secretary-General of CARICOM and to the specific Contracting Party(ies) in which the school is located, and the reason(s) for concern provided.

The CAAM provides to the Contracting Parties and the Secretary-General of CARICOM a copy of its annual report, which contains an updated directory of accredited programmes, and a summary of the year's accreditation actions and major activities.

The CAAM will notify the Contracting Parties and the Secretary-General of CARICOM of any proposed change in policies, procedures, or accreditation standards. The Secretariat shall prepare the necessary reports requested by the Contracting Parties for continued recognition of the CAAM as the reliable authority for the accreditation of medical, dental, veterinary and other health professions education programmes.

The Secretariat will attend meetings at the invitation of the Secretary-General of CARICOM and maintain an ongoing dialogue on matters of accreditation and licensure.

Response to Actions of Other Oversight/Accrediting/ Licensing Bodies

In general, the CAAM will not grant or renew provisional or full accreditation to programmes within institutions where an agency recognised by the contracting party in which the institution is located has made a decision to deny accreditation or pre-accreditation to the institution; to suspend, revoke, withdraw, or terminate the institution's accreditation or pre-accreditation; or to impose probationary status on the institution. However, the CAAM will promptly review the accreditation of such a programme at the request of the contracting party in which the institution is located and report its findings to that contracting party.

Information Made Available to the Public

The CAAM secretariat makes available to the public their informational documents, including *Standards for the Accreditation of Medical, Dental, and Veterinary Schools; Procedures of the CAAM*; the current list of CAAM members and staff; and the list of currently accredited programmes. The CAAM discloses to the public only the accreditation status of each educational programme and the date at which its next survey is due. In the case of a final decision to place a programme on probation or to deny or terminate the full or provisional accreditation of a programme, the CAAM will notify the public through its communication channels as soon as the relevant parties have been notified. The public will also be notified if a programme withdraws voluntarily from accreditation or allows its accreditation to lapse. If a school makes a public disclosure of its accreditation status, the programme must disclose that status accurately, and provide the name, address, and telephone number of the CAAM Secretariat. Any incorrect or misleading statements about accreditation actions or accreditation status must be corrected or clarified by an official announcement and/or notification. Failure to make such correction or clarification may result in an accreditation action.

DATA COLLECTION BY THE CAAM

Each accredited medical, dental and veterinary school is required to complete annual questionnaire surveys that are carried out under the auspices of the CAAM. The Annual Medical, Dental or Veterinary School Questionnaire collects academic and enrollment data and is the administrative responsibility of the Secretariat staff who will review the questionnaires to keep the content consistent with other CAAM survey documents and bring any significant changes to the notice of the Chair. Data derived from the CAAM annual questionnaires are compiled into a statistical summary report for CAAM members, and otherwise made available to relevant schools and the public.

COMPLAINTS

Complaints about Programme Quality

CAAM procedures for handling complaints about programme quality are described in Appendix G. The CAAM will act only on complaints about programme quality that may, if substantiated,

indicate areas of non-compliance with accreditation standards. In such circumstances the Secretariat will, with the knowledge and cooperation of those concerned, including the appropriate officials of the medical, dental or veterinary school, forward the complaint to an *ad hoc* Subcommittee on Complaints that is appointed by the Chair on the advice of the secretariat from among members of the CAAM. The subcommittee will review the information. If there is evidence that areas of non-compliance with accreditation standards may exist, the subcommittee will make a report, with recommendations, to the CAAM.

The CAAM does not deal with complaints of individuals regarding personal issues including matters of admission, appointment, promotion, or dismissal unless the matter is deemed to represent a breach of accreditation standards.

Complaints about the CAAM

Complaints about the CAAM itself, relating to accreditation standards, criteria, or procedures, are reviewed by an *ad hoc* committee appointed by the chair. The Committee will present its findings, which may or may not include recommendations for action, to the CAAM at the next regularly scheduled meeting. The complainant will be advised in a timely manner of the CAAM's response to the complaint.

Complaints about a Survey or Report

Complaints from the dean of a school or the chief executive of the university, or unresolved differences of opinion between such officials and the CAAM regarding the conduct of a site survey or the tone or conclusions of a survey report, are included as part of the CAAM's review of the programme's accreditation status.

WITHDRAWAL OF APPLICATION FOR ACCREDITATION

A programme may withdraw an application for accreditation at any time before a final decision is made on its accreditation status. There will be no refund of the accreditation fee paid on application.

WITHDRAWAL FROM ACCREDITED STATUS; MEDICAL, DENTAL OR VETERINARY SCHOOL CLOSURE

A programme may withdraw from any status of accreditation at any time by written request of the chief executive officer of the institution. The CAAM will promptly notify the Contracting Parties, other relevant bodies, and the public of a programme's voluntary withdrawal from its accreditation status.

Guidelines for the closure of a medical, dental or veterinary school, either voluntarily or resulting from withdrawal of accreditation, are described in Appendix H.

ACCREDITATION OF MEDICAL, DENTAL OR VETERINARY SCHOOLS OUTSIDE OF THE PARTICIPATING COUNTRIES

The CAAM does not normally accredit educational programmes in institutions that are chartered outside of the participating countries. Institutions in CARICOM countries which are not contracting parties will be considered on payment of a special fee determined by the Secretariat.

The CAAM, if requested, will provide information and consultation about medical, dental or veterinary education standards and the process of accreditation of education programmes that are located outside of the participating countries. Non participating countries or parties making such requests will be subject to a consultation fee.

APPENDICES

APPENDIX A

Basis for Allocation of CAAM Costs

The relative contributions of the contracting parties are determined by the CARICOM Secretariat.

The following categories of expenditures are included in the yearly budget.

1. Staff emoluments
2. Travel. Actual costs of travel for staff, survey teams, committee members and authority members, including transportation, subsistence, and other normal expenses incurred in attending CAAM meetings, survey and consultation visits, and other accreditation-related business.
3. Office expenses. Postage, supplies, telephone, printing and duplication, and other services related to activities of the CAAM, including but not limited to preparation and distribution of final reports, pre-survey forms, annual CAAM questionnaires, annual reports, petitions for recognition, etc.
4. Fees. Team secretaries, survey team members, consultants, lecturers and secretarial/clerical assistants will receive fees as authorised by the CAAM.
5. Meeting expenses. Actual costs of food, meeting rooms, etc., for scheduled CAAM meetings and conferences. Contracting parties who invite the CAAM to hold meetings in their country are expected to bear a proportion of the expenses.
6. Legal counsel. Fees and expenses for outside legal counsel to attend CAAM meetings. Costs of work outside of regular meetings (e.g., review or preparation of documents) also will be covered.

These costs are prepared in an annual budget by the secretariat and submitted for approval to the CAAM, before submission to the CARICOM secretariat.

APPENDIX B

Conflict of Interest Guidelines and Statement for CAAM Members, Staff and Surveyors

In order to avoid actual conflicts of interest, or even the appearance of such conflicts, the following procedural standards have been adopted and will be enforced by the CAAM.

1. A CAAM representative will not participate in a site visit, in discussions during CAAM meetings, or in a vote regarding any of the following schools:
 - a. A school with which the CAAM representative or an immediate family member is or in the last year has been connected as a student, faculty member, administrative officer, staff member, or agent.
 - b. Another school in the member's system or located in the same country as the school of the CAAM representative.
 - c. A school which has substantial cooperative or contractual arrangements with the school of the CAAM representative or an immediate family member.
 - d. A school which has engaged the CAAM representative or an immediate family member to act as a consultant on behalf of the school within the past three years.
 - e. A school in which the CAAM representative or an immediate family member has any financial, professional or other interest that may conflict with the interests of the CAAM.
2. A CAAM representative will not act as an external consultant on accreditation matters to any school subject to CAAM accreditation unless such consultation is requested by and conducted on behalf of the CAAM.
3. Definitions
 - a. **CAAM representative:** A CAAM member, staff member, or surveyor.
 - b. **Immediate Family Member:** A spouse, life partner, child, parent, or sibling of a CAAM representative.
 - c. **Consultation:** The provision of advice on such matters as programme development or evaluation, organisational structure or design, and institutional management or financing; however, this is not meant to exclude the provision of short term educational services, e.g., as guest lecturer.
4. **CAAM Discretion.** Whenever in these guidelines a term is not expressly defined, the definition of such term and its potential for creating a conflict of interest shall be at the sole discretion of the CAAM secretariat or, upon the secretariat's determination, at the sole discretion of the CAAM.

Declaration: next page.

Appendix B

Declaration re-Conflict of Interest

Each CAAM representative will sign the following declaration:

I have read the Policy titled Conflict of Interest Guidelines for CAAM Representatives.

I Understand the Policy and I Agree to be Bound by its Terms.

Name

Signature

Date

APPENDIX C

Confidentiality Statement for CAAM Members, Staff, and Surveyors

I understand that in connection with my membership on or service to the Caribbean Accreditation Authority for Education in Medicine (the "CAAM"), that I will be exposed to Confidential Information relating to the accreditation of undergraduate medical, dental, veterinary or other health professions education programmes. In order to protect such Confidential Information, and the CAAM's interest in maintaining confidentiality I hereby make the following declaration.

I hereby promise that I will not make copies of, disclose, discuss, describe, distribute or disseminate, in any manner whatsoever, either orally or in written form, any Confidential Information that I receive or generate, or any part of it.

I will not use such Confidential Information for personal or professional benefit or for any other reason, except directly in connection with my service to the CAAM.

I acknowledge that a breach of this promise of confidentiality could result in irreparable damage to the CAAM and its mission, as well as to the public.

Name _____

Signature _____

Date _____

APPENDIX D

Procedures for Changing Accreditation Standards

1. A subcommittee on Standards considers changes in standards (e.g., development of new standards, revisions to existing standards, deletions of standards) and forwards recommendations to the CAAM through the secretariat.
2. After review and deliberation, the CAAM, if it affirms the recommendation(s), adopts proposed wording for such changes.
3. CAAM proposals for substantive standard changes are submitted to the contracting parties, to the chief executive officers of participating institutions and made available to the public on the CAAM's communication mechanism, inviting comments on the proposed standards. Responses are sent to the secretariat at least four weeks before the next regular meeting of the CAAM.
4. The CAAM reconciles any proposed amendments from the organisations and the public and adopts a final version/s of the recommended standard/s. Members of the public or other concerned organisations may request to be heard at the CAAM meeting at which the standards are to be adopted.
5. If there is substantial disagreement with the proposed standard, the CAAM may either reject the proposed standard or ask the Secretariat to prepare a revised draft for reconsideration by the CAAM.
6. Should the CAAM approve a revised or new standard the contracting parties and participating institutions will be notified within 4 weeks of the meeting.
7. A revised or new standard comes into effect immediately for all new or provisional programmes, but will only apply to accredited programmes when the next full survey is due or at such time as CAAM specifies.

APPENDIX E

Observers on CAAM Survey Visits

Observers from Accrediting Agencies, Education or Health Departments

The CAAM notifies annually the contracting parties and the CARICOM secretariat of scheduled site visits to schools within the jurisdiction. The Secretariat will discuss with these authorities the areas of cooperation with agencies and ministries that will best serve the interests of all parties.

If national or regional accrediting agencies, education or health ministries wish to send observers to CAAM survey team meetings, they should apply to the secretariat to do so. The secretariat, after consultation with the institution under review, will approve what observers may attend.

Observers may participate in the discussions with school parties only to the extent that the business of the CAAM survey team is not delayed or compromised. Observers are not to solicit the findings or conclusions of CAAM surveyors.

To avoid duplicating preparation, the school will be requested to send a copy of the self-study and education database to the observer(s) in the country. The observer(s) may attend the CAAM team's pre-survey caucus and the meetings of surveyors with school administrators, faculty members, and students that are for the purposes of fact-finding. The observers will not attend the survey team's report-writing sessions or the exit conferences with the dean and president. Draft survey reports are not to be shared with regional/state accrediting agencies, ministries or their representatives. Schools may provide the appropriate agencies with copies of final survey reports and transmittal letters from the CAAM.

The Secretariat discourages joint or contemporaneous surveys that put undue pressure on the school. The team chair and/or secretary are expected to see that the collaboration goes smoothly, and to contact the secretariat if there are any questions or difficulties, or if procedures differ materially from these guidelines.

Observers from International Institutions/Organisations

Individuals wishing to participate in a survey visit must contact the Secretariat in writing. The request must include the reason for participating and the individual's role in medical, dental, veterinary or other health professions education. The request will be considered by the CAAM at its next regularly scheduled meeting. If the CAAM grants the request, the Secretariat will identify a survey visit where the observer may be included on the survey team. Permission for the observer to participate will be obtained from the school. The observer may be involved in all aspects of the survey visit but must agree in writing to hold confidential all information obtained during the visit (see Appendix C).

APPENDIX F

Appeal Procedure for Actions affecting Accreditation

Actions of the CAAM that are Subject to Appeal

The following actions by the CAAM affecting accreditation are subject to appeal:

- a. Assignment of probationary status;
- b. Withdrawal of accreditation;
- c. Denial of accreditation; or
- d. Refusal to consider for accreditation.

The appeal shall be based upon the time and circumstances that triggered the CAAM action (e.g., a survey visit, progress report, etc). Descriptions of changes made since that time will not be considered in the appeal.

Notice of CAAM Action

Upon a finding that a programme of medical, dental, veterinary or other health professions education is not in substantial compliance with the CAAM's published accreditation standards, and imposition of an initial action negatively impacting the programme's accreditation status, the CAAM secretariat shall promptly (4-weeks) notify the sponsoring institution in writing of the action and of the specific areas of non-compliance that support the imposition of the action. The Secretariat also shall inform the sponsoring institution of the right to appeal.

Notice of Appeal

If an institution wishes to appeal the CAAM's decision, it must notify the CAAM secretariat within four (4) weeks from the date of receipt of the notice of the CAAM action. Such Notice of Appeal must be addressed to the CAAM secretariat and must contain a statement of why the institution believes that the CAAM's action was improper and must include four (4) copies of any supporting documentation that the institution wishes to have considered as part of the appeal. Any supporting documentation must pertain to the time and circumstances that triggered the CAAM action. Descriptions of changes made since that time should not be included and will not be considered.

If no written request for an appeal is received by the CAAM within four (4) weeks, the CAAM's initial action shall constitute its final action and will be published.

The Appeal Process

The appeal process consists of two steps:

- (1) review by an independent ad hoc review committee, and
- (2) CAAM review with or without a hearing.

In order to expedite the process, the institution may waive either of these steps by providing a written waiver to the CAAM secretariat. At the end of the appeal process, the CAAM will make a final decision whether to affirm, modify, or reverse its initial accreditation decision.

Review by an Independent Review Committee

The first step in the appeal process is review by an *ad hoc* Review Committee, which will be advisory to the CAAM. The Review Committee shall be appointed by the CAAM secretariat in consultation with the Chair and shall consist of three individuals who may be former CAAM members or who otherwise meet the qualifications for membership on the CAAM. No person shall be included on a Review Committee for a given programme if he or she has participated in the survey visit that triggered the CAAM action; has participated in a review of recent survey findings, progress reports, or other CAAM findings or conclusions regarding the programme under review on behalf of the CAAM; or has a conflict of interest as determined under the CAAM Conflict of Interest Guidelines, Appendix B.

Once the Review Committee has been established, neither the institution bringing the appeal nor any member of the CAAM shall contact any member of the Review Committee concerning the matter under appeal.

The CAAM Secretariat shall forward to each of the members of the Review Committee the following materials, which shall constitute the Review Record: a complete file of all documents concerning the programme that were available to the CAAM and upon which the CAAM relied in the action that is the subject of the appeal, and the supporting documentation submitted by the institution as part of the Notice of Appeal. The Review Committee may request and consider any additional information it deems necessary for purposes of clarification. Any such information shall become part of the Review Record.

The Review Committee shall make one of the following recommendations to the CAAM:

- a. Affirm the initial CAAM action;
- b. Modify the CAAM action; or
- c. Reverse the CAAM action.

If the Review Committee determines that there is no reason to alter the initial CAAM action, it shall recommend that the action be reaffirmed. If the Review Committee determines that the CAAM's action is not supported by the evidence, or was not made in substantial accordance with CAAM policies and procedures, it shall recommend modification or reversal of the action. The Review Committee shall forward a written report of its recommendation, and the reasons therefore, to the CAAM. The Review Committee process, including the filing of the report, shall be completed within eight (8) weeks from the time that the institution files its decision to appeal.

The CAAM secretariat shall notify the institution in writing of the Review Committee's recommendation, and shall provide a copy of the Review Committee's report. The notification shall inform the institution that the Review Committee's recommendation will be considered by the CAAM, but is not determinative of the CAAM's final action.

Hearing before the CAAM

The second step of the appeal process is a hearing before the CAAM. No person shall be present for or participate in a hearing if he or she has a conflict of interest as determined under the CAAM Conflict of Interest Guidelines. Hearing of the case at previous CAAM meetings does not constitute a Conflict of Interest for members of the CAAM.

The Secretariat in consultation with the Chair will determine whether the CAAM should be represented by legal counsel.

Timing of CAAM Hearing

The CAAM secretariat shall schedule the appeal hearing for a regular CAAM meeting that will occur more than eight (8) weeks after receipt of the Review Committee's report.

The CAAM secretariat shall notify the institution in writing of the date, time and place of the hearing. The notice shall be provided at least six (6) weeks prior to the hearing. The notice shall advise the institution that it:

- (1) may send representatives to appear before the CAAM;
- (2) may be represented by legal counsel; and
- (3) may submit a written response to the Review Committee's recommendation.

The institution's written intent to send representatives to appear before the CAAM, the names of the representatives and, if any, the legal counsel who will attend the hearing, and any response to the Review Committee's recommendations that the institution wishes to have considered at the hearing, must be received by the CAAM secretariat no later than three (3) weeks before the scheduled date of the hearing.

The Secretariat shall send to each member of the CAAM who shall participate in the hearing the following materials, which shall constitute the Appeal Record: the Appeal, the Review Record, the Review Committee's report and recommendation, and the institution's written response to the Review Committee's recommendation.

Conduct of the Hearing before the CAAM

The hearing before the CAAM shall be limited to a consideration of the time and circumstances that triggered the initial CAAM decision. Descriptions of changes made since that time shall not be considered.

The hearing shall follow the following general format:

- a. Introductory statement of the Chair.
- b. Oral presentation by the institution (no more than one hour).
- c. Questions by CAAM members.
- d. CAAM private session

- e. Additional questions by CAAM members.
- f. Closing statement by the institution (no more than 15 minutes).
- g. Adjournment.

A verbatim record of the hearing shall be kept by a certified court reporter or electronic recording.

If the institution, without good cause, fails to appear or fails to advise the CAAM secretariat in writing more than five (5) calendar days before the scheduled date of the hearing that it will not appear, the CAAM may elect to notify the institution that no further opportunity for a personal appearance will be provided.

Decision of the CAAM

At the conclusion of the hearing, the CAAM shall meet in executive session to review the proceedings and to reach a decision. The CAAM shall consider the Appeal Record and the information presented during the hearing. The CAAM shall determine whether each of the cited areas of non-compliance with CAAM accreditation standards is supported by substantial credible evidence.

The CAAM shall determine by majority of those members present whether substantial evidence supports the existence of the cited areas of non-compliance with accreditation standards, and whether the initial CAAM action should be affirmed, modified or reversed. Such determination shall constitute final action by the CAAM.

The CAAM secretariat shall notify the institution in writing of the CAAM decision, including the reasons therefore, within four (4) weeks after the hearing.

CAAM Review Without A Hearing

After receipt of the report of the Review Committee, an institution may inform the CAAM in writing that it does not wish to appear before the CAAM. In such event, the CAAM will consider the accreditation status of the programme at the next regularly scheduled meeting. The CAAM shall rely on the Appeal Record for information and shall determine by majority of those members present whether to affirm, modify or reverse its initial action. The CAAM secretariat shall notify the institution in writing of the CAAM's decision, including the reasons therefore, within four (4) weeks after the CAAM meeting.

Such decision shall constitute final action by the CAAM.

Waiver of CAAM Review

After receipt of the report of the Review Committee, an institution may inform the CAAM in writing that it does not wish to have the CAAM review the initial action. In such event, the initial action shall constitute final action by the CAAM.

Notification of Accreditation Status

The prior accreditation status of a programme shall remain in effect until the CAAM's action in regard to the appeal becomes final.

If the CAAM's final action is to assign probationary status, withdraw accreditation, or deny or refuse to consider an institution for accreditation, the programme shall be required to notify all students enrolled, those accepted for enrollment, and those seeking enrollment. The programme shall provide the Secretariat with a copy of such notification promptly after receiving notice of the final action by the CAAM assigning probationary status, withdrawing accreditation, or denying or refusing to consider for accreditation. The programme also shall notify others, on request, of its accreditation status.

Responsibility for the Cost of Appeals

The costs of the Review Committee's review and the appeal conducted by the CAAM shall be allocated in the following manner:

- a. The CAAM shall bear all of the administrative and meeting costs for the appeal to the CAAM, including the costs of the Review Committee.
- b. The institution or programme appealing a CAAM decision shall bear all of the costs involved in the development and presentation of its appeal and in the travel and other expenses of its representatives present at any hearing.
- c. The CAAM shall bear the cost of transcribing the hearing. The sponsoring institution shall be required to pay for any copies of the transcript it desires.
- d. If the CAAM determines that the appeal was without merit and frivolous it will recover the costs of the appeal from the institution.

APPENDIX G

Caribbean Accreditation Authority for Education in Medicine (CAAM) Procedures for Handling Complaints about Programme Quality

Any person concerned about the quality of an undergraduate education programme accredited by the CAAM may contact the CAAM secretariat to discuss lodging or lodge a complaint. *Only those complaints will be investigated that, if substantiated, may constitute non-compliance with accreditation standards. The CAAM will not intervene on behalf of an individual personal complaint regarding, for example, matters of admission, appointment, promotion, or dismissal of faculty or students.*

Submitting a Complaint

Complaints must be made in writing, and the complainant identified by name, qualifications, address and telephone number, if not the complaint will not be considered.

The written complaint should contain as much information and detail as possible about the circumstances that form the basis of the complaint. Ideally, the complainant should cite the relevant accreditation standards relating to the complaint. If the complaint indicates circumstances that may, if substantiated, indicate areas of non-compliance with accreditation standards, the CAAM secretariat will contact the complainant

- (1) to obtain additional documentation, or corroboration, if needed, and
- (2) to request a signed release form.

If the complainant does not comply with either request, no further action will be taken.

The CAAM shall attempt to maintain the confidentiality of complaints and corroborating material. However:

- Any information about a programme/school may be released to the dean of the school, members and staff of the CAAM, their respective attorneys, and other persons authorised by the dean, required by law or necessity, at the discretion of the CAAM, to fully investigate the complaint.
- The complainant and any corroborators will be required to sign an authorisation to release the written complaint and corroborating materials to the dean of the school, members and staff of the CAAM, their respective attorneys, and appropriate outside parties.
- The complainant and any corroborators also will be required to authorise the school to release any information deemed necessary to the CAAM.

Investigating a Complaint

The CAAM secretariat will make an initial determination of whether the complaint contains

issues relating to the programme's compliance with accreditation standards.

If the CAAM secretariat determines that the complaint does raise such issues, the Secretariat will contact the dean, including the letter of complaint and corroborating information, and citing the information that the dean should provide in response. A response from the dean will ordinarily be requested within four (4) weeks.

Review of Complaint

The initial letter of complaint, including the corroborating materials, and the response from the dean will be reviewed by an ad hoc Subcommittee on Complaints that is appointed by the Secretariat in consultation with the Chair.

The subcommittee, at its sole discretion, may determine that there is insufficient evidence that the programme does not comply with accreditation standards. In this case, the investigation will be closed.

If the subcommittee determines that some areas of non-compliance with accreditation standards may exist, it will present its findings and recommendations to the CAAM at the next regularly scheduled CAAM meeting. The CAAM will make a final determination, including the nature and timing of any required follow-up, and will direct the Secretariat to notify the dean. The results will be entered into the school's confidential accreditation file.

Response to Complainant

The complainant will be notified either that the complaint does not warrant investigation or that an investigation is underway. The complainant will be notified when the CAAM has made a determination, but not of the outcome, and that the determination has been entered into the confidential file of the institution.

APPENDIX H

Guidelines and Procedures Relating to Medical, Dental or Veterinary School Closure, Loss of Accreditation, or Institutional Merger/Change of Ownership

These guidelines are intended to facilitate an orderly process that protects the interests of the students enrolled in a CAAM accredited educational programme in the event of school closure or merger/change of ownership.

Medical, Dental or Veterinary School Closure

In the case of unplanned or planned educational programme closure, the objective is to facilitate rapid placement of students who are in good academic standing in other accredited programmes, so that they can graduate in a timely manner. In general, the steps that a school should take in the event of unplanned or planned closure are similar. Differences will be highlighted below.

Unplanned closure is a result of a sudden decision to terminate the educational programme. This may be due to unforeseen financial or other circumstances that require a short timetable for programme phase-out, usually one academic year or less. In a **planned** closure, there should be sufficient time, at least one academic year, to allow an orderly transition and graduation or placement of students.

The CAAM secretariat should be notified as soon as a decision is made to close an educational programme. The notification should include plans that the school has made to assist student transfer and a proposed timetable. The CAAM staff will review the school plan and, if necessary, conduct a Secretariat visit to provide advice and consultation to the programme to assist in student transfer or other related issues.

The following guidelines should be incorporated into the school plan, as far as possible:

1. Closure should occur at the end of an academic year. If this is not possible, closure should be timed so that students transferring to other institutions can avoid repeating a year.
2. Student transfer and programme phase-out:
 - a. Final-year students should be allowed to graduate from the school.
 - b. If closure is to occur at the beginning of an academic year, students in the penultimate year could transfer if this would not delay their graduation. Alternatively, these students could be allowed to progress to the final-year and graduate from the school, but might complete their requirements by taking clerkships/electives at another accredited institution.
 - c. First and second year students should be assisted to transfer to another school.
3. The records of current and past students should be preserved. Arrangements should be made to store the records of graduating students and alumni, and affected individuals should be informed of the procedures to access their records. Summary copies of these records and those of transferring students should be deposited with the CAAM.

Termination of Accreditation for Programmes that are Closing

1. In the absence of an adverse CAAM action, the accreditation of the educational programme will be terminated at end of the academic year in which the last group of enrolled students graduates/transfers.
2. In the case of a CAAM action to withdraw accreditation, it would generally be withdrawn at the end of the academic year in which the CAAM action was taken. By vote of the CAAM, accreditation may be continued for an additional year if special circumstances warrant.

The CAAM secretariat will notify the Contracting Parties, the CARICOM secretariat, and through them regional accrediting bodies, country and regional licensing authorities, and other relevant individuals/groups, including the public, of the effective date on which accreditation of the institution was or will be withdrawn.

Role of the Secretariat and the CAAM in Closure

In the event of school closure, the CAAM Secretariat will on request inform other institutions that may be able to accept transfer students, about the accreditation status of the school's programmes at the time of the students' enrolment and at the closure of the school.

Accredited medical, dental or veterinary schools planning to accept transfer students from a programme that is closing should notify the CAAM so that an assessment of the adequacy of their resources for the increased class size can be made.

Medical, Dental and Veterinary Schools Merger/Change of Ownership

In the case of a medical, dental or veterinary school merger or change of ownership, the goal is to ensure the continuity of the educational programme, supported by sufficient resources for the institutionally-designated class size. A guiding principle should be that any reductions in student enrollment be made in the entering class, not at the expense of existing students.

1. The CAAM secretariat should be notified of the decision to merge or to change ownership. The school(s) should prepare a transition plan that contains the following:

For changes in ownership, the transition plan should describe the new governance structure and note any planned changes in class size, in the resources available for the education programme, or in the curriculum. In addition, for a merger, the plan should describe the timetable and process that will be used to bring the institutions together, and to create a unified and coherent administrative structure and a single, integrated faculty. The general and clinical facilities that will be used for the educational programme also should be described.

2. Upon receipt of the notice of plans for change of ownership or merger, the CAAM staff may contact the school to solicit additional information and/or conduct a Secretariat visit.

The staff will prepare a report for consideration by the CAAM at its next meeting.

Reconsideration of Accreditation by the CAAM

Upon reviewing the report of the Secretariat and the school plan, the CAAM will determine when to conduct an on-site visit, and what types of information the institution should submit as background prior to the visit.

After all data gathering has been completed, the CAAM will make a determination of whether accreditation should be continued or granted *de novo* for the educational programme at the new organisational entity, or whether any adverse action is warranted. The decision to continue or grant accreditation will be based on an assessment of compliance with accreditation standards, including the adequacy of resources for the educational programme at the new entity and for any remnants of the curriculum that existed at the institution(s) prior to merger. The CAAM also will determine when any progress reports or additional survey visits will be scheduled.

The Secretariat will notify the Contracting Parties and other relevant entities of the CAAM action.