



THE CARIBBEAN ACCREDITATION AUTHORITY FOR EDUCATION IN MEDICINE AND OTHER HEALTH PROFESSIONS

Procedures of the Caribbean Accreditation Authority for Education in Medicine and Other Health Professions

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HISTORICAL BACKGROUND

The Caribbean Accreditation Authority for Education in Medicine and Other Health Professions (CAAM-HP) was established in 2004 under the *aegis* of the Caribbean Community (CARICOM) to ensure that the education programmes of medicine and other health professions offered by institutions in participating countries are recognised nationally and regionally to be of international standard.

Medical education in the Caribbean Community (CARICOM) began with thirty-three (33) students in 1948 at the foundation of the University College of the West Indies (UCWI), at the Mona Campus in Jamaica as a constituent part of the University of London. In 1962 the UCWI sought independence from London becoming The University of the West Indies (UWI). From its inception until 2001 when the practice of accrediting overseas institutions was discontinued in keeping with European Union (EU) regulations regarding academic and professional training programmes, the medical education programme of the UWI was accredited by the General Medical Council (GMC) of the UK. This gave national, regional and international recognition to UWI graduates who were able to register freely in the UK and other Commonwealth countries. This practice continued over the years even as various changes took place in medical education at The University of the West Indies (UWI).

Other medical schools were established at the University of Suriname in 1969 and at the University of Guyana in 1985.

From the mid-1970s onwards the region has witnessed an influx of 'offshore' medical schools with an almost exclusively international student population mainly from the US and Canada.

In response to these developments and the regional thrust to ensure quality education and training in the context of the CARICOM Single Market and Economy (CSME), a regional accreditation system was established as a means of providing the assurance of quality that generates confidence in the stakeholders.

Thus, the Caribbean Accreditation Authority for Education in Medicine and Other Health Professions (CAAM-HP) was formally launched under the *aegis* of the Caribbean Community (CARICOM) in July 2004 to accredit the education programmes of medicine, dentistry, veterinary medicine, nursing and other health professions in CARICOM member states.

SCOPE OF CAAM-HP RESPONSIBILITY

The CAAM-HP accredits medical, dental, veterinary and degree nursing education and other health professions programmes of schools located in the participating countries of CARICOM.

On request, CAAM-HP also assesses education programmes, of schools in Caribbean countries outside the CARICOM framework and represents governments and accredited schools before extra-regional authorities on the status/quality of their education programmes.

CAAM-HP does NOT have responsibility for the registration of institutions to legally operate in countries. This is the function of the country's accreditation body/mechanism. However, on request, CAAM-HP may advise governments on the quality of the education programmes of schools that operate or are applying to operate in their countries.

CAAM-HP does NOT register or license medical or other health professionals. This authority lies with the governments and their relevant Councils or Boards. However, CAAM-HP in its accreditation decisions, may recommend when graduates of accredited schools should be asked to sit the Caribbean Association of Medical Councils (CAMC) regional examinations or its equivalents.

OVERVIEW OF ACCREDITATION

Through accreditation, the CAAM-HP provides assurance to students, graduates, the health professions, healthcare institutions and the public that undergraduate programmes leading to qualifications in medicine, dentistry, veterinary medicine and nursing and other health professions meet appropriate national and international standards for educational quality, and that the graduates have a sufficiently complete and valid educational experience. Accreditation standards of the CAAM-HP are described in the *Standards for the Accreditation* of each specified programme - medical, dental, veterinary or degree nursing programmes, and are available on the CAAM-HP website at www.caam-hp.org.

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

Programmes assessed by the CAAM-HP are awarded a state of accreditation according to the level of compliance with accreditation standards. For further information, see Appendix A *States of Accreditation of CAAM-HP*.

CAAM-HP MEMBERSHIP

Composition

The CAAM-HP 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 (1) 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:
 - i. Two (2) persons nominated jointly by academic institutions offering training in other health professions in the Community
 - ii. Two (2) students enrolled in training programmes in other health professions in institutions in the Community nominated jointly by those institutions.

Terms of Appointment

1. Persons referred to in paragraphs (a), (b), (c), (d), (g) and (j) sub-paragraph (i) 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.
2. Persons referred to in paragraph (e) and (j) sub-paragraph (ii) 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.
3. Persons referred to in paragraph (f) shall be appointed for a single term not exceeding three years.
4. Representatives referred to in paragraph (h) shall be appointed for a term of three years.

Criteria for Membership and Member Selection

- a. The members nominated pursuant to paragraph (a) and (j) sub-paragraph (i) 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 medical sciences or in the relevant other health professions.
- b. 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.
- c. 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.
- d. The members nominated pursuant to paragraph (e) and (j) sub-paragraph (ii) 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.
- e. The Secretariat shall be responsible for soliciting nominations for membership.

- f. 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.
- g. Where a member is unable to act or resigns, the competent institutions shall nominate another person to act in the place of that member.
- h. 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 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 meeting of the Authority when the school/institution is being evaluated.

New members of the CAAM-HP 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 an orientation session for new members regarding the interpretation of standards and the assessment of compliance.

Voting

All CAAM-HP 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-HP

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 the section on CAAM-HP Membership (a), (b), (c), (d), (g) and (j) sub-paragraph (i) 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.

OBJECTIVES OF THE AUTHORITY

The Authority has the following objectives:

- Achieving and maintaining standards of excellence in programmes of education in medicine and other health professions
- Establishing an efficient system of regulation in relation to the standards and quality of such programmes of education
- Securing international recognition of the programmes of education in medicine and other health professions
- 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:

1. Determine and prescribe standards, criteria and systems for the accreditation of programmes of education in medicine and other health professions
2. Select suitable persons as assessors and appoint panels of assessors
3. Accredite, on the basis of the reports of the assessors, programmes of education in medicine and other health professions
4. Facilitate the development of an accreditation and quality assurance ethos in the participating countries
5. Collaborate with professional bodies to develop training programmes designed to create a regional cadre of trained assessors
6. Establish rules, guidelines and procedures in relation to the accreditation of education programmes in medicine and other health professions
7. Approve arrangements and systems for accrediting programmes of education in medicine and other health professions
8. Withdraw or modify, as appropriate, accreditation granted to any programme
9. Establish and maintain relations with bodies outside the CARICOM region having functions in relation to accreditation and quality assurance
10. Approve the budget of the Authority; the financial and staff regulations
11. Appoint an auditor
12. 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 such persons shall not be deemed to be a member of the Authority.

Liability

Members of the Authority and members of the staff of the Secretariat engaged in authorised CAAM-HP activity are protected from legal process as set out in the Agreement establishing CAAM-HP. The CAAM-HP possesses full legal capacity and in particular to institute and defend legal proceedings.

FUNCTIONS OF THE SECRETARIAT

The Secretariat is responsible for the general administration of the Authority. In addition to any functions which may be assigned to it by the Authority, the Secretariat will:

1. Conduct research on accreditation and quality assurance so as to inform the work of the Authority
2. Manage the accreditation cycle for programmes;
3. Communicate with and provide guidance and advice to institutions that are engaged in or propose to be engaged in the Authority's accreditation process
4. Undertake or arrange for the training of persons as assessors of programmes
5. 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
6. Maintain a record of all activities
7. Prepare an annual report of the Authority's work
8. Maintain, on behalf of the Authority, contacts with bodies outside of the CARICOM region having functions in relation to accreditation and quality assurance
9. Prepare the draft budget of the Authority and submit it for the consideration and approval of the Authority
10. Prepare and submit for the consideration and approval of the Authority, the staff regulations and financial regulations of the Authority
11. Prepare an annual Work Programme and present it to the Authority for approval
12. Service meetings of the Authority and any committee thereof.

Consultation Services

Upon request, the Secretariat staff provides consultation to officials of existing 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 school should contact the Secretariat to arrange for a consultation.

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 (COHSOD) (an organ of the Caribbean Community (CARICOM)) 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.

CONFLICT OF INTEREST AND CONFIDENTIALITY POLICIES

CAAM-HP members, staff, and surveyors must sign conflict of interest and confidentiality statements indicating their agreement to abide by the terms of the following policies as a condition for participating in CAAM-HP meetings, survey visits or other related accreditation activities.

Conflict of Interest Guidelines

The conflict of interest policy and procedures are described in Appendix D. These procedural standards are designed to avoid actual conflicts of interest, or even the appearance of such conflicts, and will be implemented by the CAAM-HP.

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's 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 Executive Director.

Confidentiality Guidelines

CAAM-HP and schools have a reasonable expectation of confidentiality with respect to documents submitted or generated as part of accreditation activities. CAAM-HP members, staff, and surveyors must sign a statement (Appendix D) agreeing to treat as confidential any information they receive or generate in connection with accreditation activities. The confidentiality obligation also includes a requirement related to the confidential disposal of materials after survey visits, CAAM-HP meetings, or appeals.

MEETINGS OF THE CAAM-HP

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 Chair, may canvass the members by mail, fax, email, telephone, video-conferencing or other communication tool 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 as determined by the Executive Director.

Special or other meetings will normally be held at the location of the Secretariat or at such site as determined by the Executive Director in consultation with 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 D). Current or recent faculty or student /graduate status, same country location (in the case of entirely local considerations), or recent formal consultation at a school, constitute some of the reasons for abstention and temporary recusal 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. Where a member of the Board has failed to attend two or more meetings during his/her tenure, the nominating institution shall be so advised and, as appropriate, a replacement nomination shall be sought.

Observers at CAAM-HP 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-HP. Requests must be made in writing to the Secretariat.

Observers must sign the conflict of interest and the confidentiality policies attesting that they will abide by their terms. All meeting materials and the results of CAAM-HP discussions are confidential and 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. This review includes obtaining feedback on the validity and clarity of standards from the relevant constituencies of the CAAM-HP.

PROCEDURES FOR CHANGING ACCREDITATION STANDARDS

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

The procedure for changing CAAM-HP accreditation standards is described in Appendix F.

TERM OF ACCREDITATION

An educational programme once accredited, remains accredited until the CAAM-HP terminates accreditation of the programme formally or the programme itself terminates its accreditation status. If it is brought to the attention of the CAAM-HP 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.

In the event that the CAAM-HP determines that accreditation should be withdrawn, the letter transmitting that decision will specify the date at which accreditation ceases. Withdrawal may be appealed using the procedures described in Appendix H.

Accreditation is a cyclical process and does not end merely because a certain period of time has passed. Programmes are subject to periodic reviews. The nature and timing of such reviews vary based on the particular status and conditions of a given programme. CAAM-HP reserves the right to undertake an early or unplanned review if circumstances warrant.

OVERVIEW OF SURVEY PROCESS FOR ESTABLISHED PROGRAMMES

The CAAM-HP document Guidelines for Accreditation Survey Visits details the steps in the accreditation process, the responsibilities of the parties involved and the planning and conduct of survey visits.

The survey process for schools with established programmes, those accredited and those unaccredited, consists of an institutional self-study including the completion of an education database, an on-site evaluation by a team of surveyors and the CAAM-HP review of the survey team's report and any other relevant documentation. The process normally takes up to 15 months. Schools with unaccredited programmes submit a written request for an accreditation review to the CAAM-HP Secretariat to start the process.

Institutional Self-Study

A school with an established programme is expected to complete a self-study prior to a full accreditation survey. Information on the process for conducting the self-study for each discipline is provided in the relevant CAAM-HP's guide to the institutional self-study that is available for download from the website at www.caam-hp.org.

As part of the self-study, established schools complete the education database. This is designed to elicit essential data in an efficient manner, utilising summary tables and charts. This format permits the display of significant data in comparable format in all reports. The Secretariat will periodically review and revise the education databases as necessary and current versions of these databases can be downloaded from the website at www.caam-hp.org.

The above-mentioned Guide contains a draft schedule for carrying out the self-study process. The self-study report must be completed and sent to the Secretariat at least three months prior to each full accreditation survey visit. The CAAM-HP Secretariat provides the Self-Study together with any additional relevant documentation to team members. Both the survey team and the school receive information on the duties of the survey team, the conduct of the site visit and the writing of the survey report.

Role of the Students

The document '*Students' Role in the CAAM-HP*' describes the important contribution that students play in the accreditation process. Students in a school preparing for an accreditation survey are expected to organize their own independent analysis of the educational programme, courses and curriculum, student support services, and the environment for learning. They should also be members of various committees conducting the institutional self-study. Groups of students will be scheduled to meet with surveyors during the school's site visit. (See the document '*Students' Role in the CAAM-HP*' for further details.)

Opportunity for Third-Party Comment

The CAAM-HP provides for third parties to comment on programmes undergoing review for accreditation, renewal of accreditation or for provisional accreditation or candidacy. Comments must be limited to the programme's compliance with the CAAM-HP's relevant accreditation standards as outlined for medical and other individual health professions programmes in the Caribbean Community (CARICOM). For consideration to be given to such comments, there must be a sufficient verifiable factual basis and the party must be identifiable and be willing to engage in follow-up discussions with CAAM-HP if necessary. Third-party comments should be received by the CAAM-HP 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* are typically conducted every four to six years. Completion of an education database and an institutional self-study are required prior to a full survey.
2. *Limited (focussed) accreditation surveys* may be conducted during the period of accreditation to focus on specific problem areas. An institutional self-study is not required prior to a limited survey, unless specified by the CAAM-HP. A focussed "mini-database," with information specified by the Secretariat, is prepared by the school and sent to the Secretariat for forwarding to the survey team at least 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-HP. The purpose of a Secretariat visit is fact-finding for the CAAM-HP on specified issues.

Duration of Surveys and Survey Schedule

Full surveys, in general, are scheduled to last between three and one-half and five working days, depending on the number of clinical sites to be visited and their locations. 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 and characteristics of the school such as the presence of multiple campuses and/or clinical teaching sites.

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

The CAAM-HP Secretariat, in consultation with the team chair, will develop the visit schedule with the dean.

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 school. The CAAM-HP Secretariat is available for meetings with officials or for a consultation site visit to assist a school with early planning.

CAAM-HP documents with detailed information on the standards, requirements and procedures for New and Developing Schools are available on the CAAM-HP website at www.caam-hp.org and should be consulted for current accreditation standards and the requirements for a full accreditation review.

Process for Review of Developing Programmes

Candidacy is the status granted to new programmes which the Authority reviews from the initial phase of development of the programme (New and Developing Schools).

Candidacy is **not** accreditation and does not guarantee eventual accreditation. Candidacy merely indicates that a school has met the minimum standards to begin operations.

Candidacy: For a programme to be considered for Candidacy, the school must first pay the required fee (see Appendix C for Schedule of fees for accreditation review), provide information outlined in the document *'Accreditation Guidelines for New and Developing Schools'* 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 to provide the basis for a CAAM-HP decision to schedule a survey team visit for a full accreditation review.

1. The initial candidacy survey is conducted during the year prior to enrolment of the first class to determine whether the minimum requirements for consideration by the CAAM-HP have been met. (See document, *'Accreditation Guidelines for New and Developing Schools'*). Based on the report of the survey team, the CAAM-HP will determine whether or not to award candidacy status.
2. An interim 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. A progress report is required for review by the CAAM-HP.
3. A second interim candidacy survey is conducted during the second year of the initial class, and consists of a general review of the status of the educational programme and the planning for

clinical teaching in the later years. Prior to this survey, another progress report will be required for review by the CAAM-HP.

4. A consultation survey is arranged 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. A report of the survey will be reviewed by the CAAM-HP.
5. The survey for a full accreditation review is usually conducted early in the fourth year of the programme. The school is required to submit an institutional self-study, an education database, and a plan for further development of the programme. The CAAM-HP will review the survey team report and make a determination on accreditation.
6. Once Candidacy is awarded, schools are required to submit annual progress reports stating what actions are being taken to address areas of non-compliance.

FEES FOR ACCREDITATION REVIEWS

Accredited and applicant schools pay fees in accordance with the Authority’s schedule of fees for accreditation services. Fees are paid in advance to the CAAM-HP Secretariat and are non-refundable.

CAAM-HP reserves the right to withdraw accreditation from a programme, if the school, after due notice, does not pay its scheduled fees.

Please refer to Appendix C for the Schedule of Fees.

PUBLICATION OF ACCREDITATION DECISIONS

While CAAM-HP does not publish, i.e. put on its website, the site visit report, it reserves the right to make public the accreditation status granted to all schools. This is in keeping with international practice. Schools are advised that they may publish the site visit report at their discretion.

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 based, in part, on the judgment of the CAAM-HP that there is an appropriate balance between student enrolment 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 enrolment; or a change in institutional resources, so that the balance between enrolment 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

School officials must notify CAAM-HP in writing, at least one year in advance, 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), providing details of the change and a transition plan (see Appendix I). CAAM-HP may also conduct a Secretariat visit. The report and the visit allow the CAAM-HP 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. Failure to comply could have negative consequences for the programme's accreditation status.

SURVEY TEAM APPOINTMENT AND FUNCTION

Selection/Training of Surveyors

The Secretariat recruits and trains a suitable group of surveyors who are knowledgeable about medical or other health professions 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 prior to a survey visit. In addition, on a larger scale, interactive workshops are offered as required for in-depth training of prospective surveyors, focussing on the interpretation of standards and the assessment of compliance. The survey team includes experienced surveyors as well as other qualified professionals who would have participated in a CAAM-HP training workshop.

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 should include one member of the CAAM-HP or of the Secretariat. Survey team appointments are in keeping with the CAAM-HP's Conflict of Interest Guidelines (Appendix D). 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 issues.

Survey teams are accompanied by a member of the Secretariat staff to ensure that guidelines and procedures are followed and that standards are interpreted correctly and consistently.

Role of the Survey Team

Survey teams are charged to assess how well the 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-HP. The CAAM-HP has sole authority, after due deliberation, to grant, withhold or modify a programme's accreditation.

Survey Team Size and Composition

Full survey

A full survey typically involves four to 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 appointed by the Secretariat after the team has been selected
- 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-HP member who is an educational administrator/senior faculty member and has not previously participated in a survey visit. This will facilitate development of the capacity among regional medical educators.

Limited (focussed) survey

A limited survey is conducted by experienced surveyors and may include Secretariat 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.

Secretariat visit

A Secretariat visit is conducted by the Executive Director or an experienced member of the Secretariat staff. A member of the CAAM-HP may also be included.

Observers on CAAM-HP 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 from a regional or international accrediting agency may be authorised to observe a CAAM-HP survey. Individuals may serve as observers as part of their orientation to the CAAM-HP and the accreditation process. Distinguished international educators may also be observers on survey visits by special request and after approval by the Secretariat and the school to be visited. Observers or their institutions are expected to meet all costs associated with their participation in a site visit.

The guidelines for participation by observers are contained in Appendix G.

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.

Honoraria

Once the date for the visit has been established, the CAAM-HP Secretariat prepares a budget which is submitted to the institution to be visited. The CAAM-HP pays the expenses for all survey team members on behalf of the institution.

Each team secretary receives an honorarium and any related secretarial/clerical cost is also reimbursed. Team members also receive an honorarium. Please refer to Appendix C for Schedule of Fees.

SURVEY REPORTS

The survey report is the formal record of the survey visit and is used by CAAM-HP in making a decision with respect to a programme's accreditation status. The report provides detailed information about the programme's compliance with each accreditation standard.

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 Education Database and Institutional Self-Study, as described in the *'Guide for Writing a Report on a Survey Team Visit'* available on the website.

Review

The draft report is sent for review to:

- the CAAM-HP Secretariat
- each team member, and
- 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, through the Executive Director, 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 Executive Director, CAAM-HP for inclusion with the report, for consideration by the CAAM-HP.

After the CAAM-HP Secretariat receives the final report, it is circulated by electronic mail to members of the CAAM-HP 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-HP meeting.

CAAM-HP ACCREDITATION ACTIONS

Action Following a Survey Visit

In general, the CAAM-HP bases its determination on the survey report. As noted in the above 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-HP as it makes an accreditation determination. Information received after the date of the on-site survey will only be considered in the CAAM-HP’s deliberations if such information relates to issues that could have a significant impact on 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.

A summary report of a full or limited survey under consideration by the CAAM-HP at a regular meeting is presented by members of the CAAM-HP who are selected in advance by the Secretariat. Following these presentations and subsequent discussion, the CAAM-HP shall vote formally on the accreditation status of the programme and any requirements for follow-up (such as progress reports, a limited visit, and/or a Secretariat visit).

Progress Reports

A school is required to submit annual 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-HP questions or concerns. Progress reports will normally be discussed at the next regularly scheduled meeting of the CAAM-HP.

After review, the CAAM-HP may:

- Accept the report
- Defer action pending receipt of further information
- Decline to accept a report that is deficient and request that a more complete report be submitted.

CAAM-HP action on a progress report includes consideration and determination of the accreditation status of the programme (for example, extension of the original period of accreditation or Accreditation on Probation) and the required follow-up (for example, an additional progress report or a survey visit).

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-HP action unless the period for achieving compliance is extended for good cause

Reporting of CAAM-HP Action to the Institution

Within one month of the CAAM-HP determination a Letter of Notification 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 Notification contains the final CAAM-HP 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 Notification are held confidential by the CAAM-HP. 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 Letter of Notification, signed by the Chair and Executive Director of the CAAM-HP 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-HP action and any required follow-up.

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

Accreditation decisions are also made available on the CAAM-HP website, www.caam-hp.org.

ACTIONS SUBJECT TO APPEAL

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

REPORTING OF CAAM-HP ACTIONS TO EXTERNAL GROUPS

Reporting to Contracting Parties

The CAAM-HP will notify the Secretary-General of CARICOM and the Contracting Parties, within one month of final accreditation actions taken at a CAAM-HP 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 candidacy or accreditation, or to place an accredited or provisionally-accredited programme on probationary status will be reported to the Secretary-General of CARICOM as well as the 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-HP. In decisions to deny or withdraw accreditation, the CAAM-HP 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-HP provides to the Secretary-General of CARICOM and the Contracting Parties 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-HP will notify the Secretary-General of CARICOM and the Contracting Parties of any proposed change in policies, procedures, or accreditation standards. The Secretariat shall prepare the necessary reports requested by the Secretary-General for continued recognition of the CAAM-HP as the reliable authority for the accreditation of medical 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-HP will not grant or renew 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-HP will promptly review the accreditation of such a programme and report its findings to that Contracting Party.

Information Made Available to the Public

The CAAM-HP Secretariat makes available to the public their informational documents, including Standards for the Accreditation of Medical, Dental, and Veterinary Schools and Degree Nursing Programmes; Procedures of the CAAM-HP; the current list of CAAM-HP members; and the list of currently accredited programmes. The CAAM-HP 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 withdraw the status of accreditation or provisional accreditation of a programme, the CAAM-HP 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-HP 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 adverse/unfavourable accreditation action.

DATA COLLECTION BY THE CAAM-HP

Each school with accredited programmes is required to complete annual questionnaires that are carried out under the auspices of the CAAM-HP. The Annual *Medical, Dental, Veterinary or Nursing School* Questionnaire collects academic and enrolment data and is the administrative responsibility of the Secretariat staff who will review the questionnaires to keep the content consistent with other CAAM-HP survey documents and bring any significant changes to the notice

of the Chair. Data derived from the CAAM-HP annual questionnaires are compiled into a statistical summary report for CAAM-HP members, and otherwise made available to relevant schools and the public to the extent permitted by the confidentiality requirements.

COMPLAINTS

Complaints about Programme Quality

CAAM-HP procedures for handling complaints about programme quality are described in Appendix I. The CAAM-HP 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 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-HP. 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-HP.

The CAAM-HP does not deal with complaints from 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-HP

Complaints about the CAAM-HP itself, relating to accreditation standards, criteria, or procedures, are reviewed by an *ad hoc* committee appointed by the chair on the advice of the Secretariat. The committee will present its findings, which may or may not include recommendations for action, to the CAAM-HP at the next regularly scheduled meeting. The complainant will be advised in a timely manner of the CAAM-HP'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-HP regarding the conduct of a site visit or the tone or conclusions of a survey report, are included as part of the CAAM-HP'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 administrative or accreditation fees paid on application.

WITHDRAWAL FROM ACCREDITED STATUS; SCHOOL CLOSURE

A programme may voluntarily withdraw from any status of accreditation at any time by written request of the chief executive officer of the school. The CAAM-HP 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 school or programme discontinuation, either voluntarily or resulting from withdrawal of accreditation, are described in Appendix J.

ACCREDITATION OF HEALTH PROFESSIONS SCHOOLS OUTSIDE OF THE PARTICIPATING COUNTRIES

The CAAM-HP, if requested, will review educational programmes for accreditation in institutions that are chartered outside of the participating countries. Institutions in CARICOM countries which are not contracting parties will be required to pay a special fee determined by the Authority. See Appendix C for Schedule of Fees.

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

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STATES OF ACCREDITATION OF CAAM-HP

SCHOOLS WITH ACCREDITED PROGRAMMES

Accreditation Granted

Granted for a maximum period of the length of the academic programme

The Authority may continue to accredit a programme based on the determination that the programme continues to meet the accreditation standards and the school is expected to maintain those standards for the accreditation period.

In making this determination the Authority will rely on the report of a survey visit. The Authority will detail any areas of weakness to the administration of the school and the stated period within which the school is expected to address the issues and demonstrate compliance.

The Authority will receive and examine annual progress reports from the school and determine whether further accreditation action is required during the period of accreditation.

Accreditation Extended

Granted for a period of 1 or 2 years at the discretion of the Authority

The Authority may extend the accreditation period of an accredited programme for one (1) or two (2) years based on the determination that a school has made substantial progress in addressing the areas of weakness.

The Authority will receive and examine annual progress reports from the school and determine what further accreditation action is required during the period of extension.

Probation

Assigned for a period of no more than 3 years

The Authority may place an accredited programme on probation based on the determination that the programme has substantial areas of non-compliance or that the school has failed to make satisfactory progress in addressing areas of weakness identified by the Authority and that the level and scope of these areas of non-compliance may seriously compromise the quality of the educational programme and/or may jeopardize the educational attainment of students.

In making this determination the Authority will rely on the report of a survey visit. The Authority will assign a probationary period of not more than three (3) years, effective from the Authority's notification letter. During the probationary period the school must address the issues and demonstrate compliance with the standards. During the period of probation, the school will be subject to reports and visits at a frequency determined by the Authority. After this period an

evaluation of the school's programme will be made by a survey visit and the Authority will determine what further accreditation action will be taken.

During the period of probation, the Authority will recommend to licensing bodies in CARICOM that graduates of the school take an approved licensing examination for practice.

Placing a school on Probation is subject to appeal. See Appendix H, *Policy and Procedures for Appeal of Adverse Accrediting Actions*

Accreditation Withdrawn

Withdrawal of Accreditation need not be preceded by a period of probation if the Authority determines that there has been a rapid and precipitous deterioration in the quality of the programme or the governance of the school.

The Authority may withdraw accreditation of an accredited programme based on the determination that:

- a. The programme is no longer in substantial compliance with the accreditation standards and demonstrates critical deficiencies in governance, administration, educational programmes or resources which are sufficiently extensive that they raise serious concerns about one or more of the following:
 - The school's capacity to make appropriate improvements in a timely manner
 - The educational attainment and competence of graduates
 - The governance and integrity of the school
 - The school's capacity to continue to sustain itself

- b. A programme with candidacy, provisional accreditation or on probation has failed to satisfactorily address the areas of non-compliance and is not in substantial compliance with the accreditation standards

In making this determination the Authority will rely on the submitted reports of the school as well as the report of a survey visit to the school.

- c. The school has submitted falsified information or has demonstrated unethical behaviour which has an impact on the programme and the operations of the school
- d. The school has failed to secure legal authorization to operate and grant degrees or has had such authorization terminated

In making this determination the Authority will rely on the accreditation submission and the submitted reports of the school and on documented third-party information, if relevant.

- e. the school has:
 - Ceased to operate
 - Failed to respond to two or more requests by CAAM-HP over a period of six (6) months for information on the status of the school/programme

The Authority will decide the effective date of the withdrawal of accreditation status. The decision with respect to the effective date is not subject to appeal.

The Authority will recommend to licensing bodies in CARICOM that:

- Graduates who were in the school at the time that the determination to withdraw the accreditation was made take an approved licensing examination for practice
- Graduates who entered the school after the date on which the determination to withdraw was made, be denied a license to practise

A school which has had its accreditation for a programme withdrawn may not re-apply for accreditation for at least three (3) years from the effective date of withdrawal.

Accreditation Withdrawn is subject to appeal. See Appendix H *Policy and Procedures for Appeal of Adverse Accrediting Actions*.

SCHOOLS SEEKING INITIAL ACCREDITATION

Provisional Accreditation Granted

Granted for a period of 3 years

The Authority may grant provisional accreditation to a programme based on the determination that the programme has met the standards as established in the document *Accreditation Guidelines for New and Developing Schools* and the school has demonstrated the potential by its governance, administration and education programmes to substantially comply with all the accreditation standards within the three (3) year provisional period.

In making this determination the Authority will rely on the report of a survey visit. The Authority will detail any areas of weakness to the administration of the school and the stated period within which the school is expected to address the issues and demonstrate compliance.

The Authority will receive and examine annual progress reports from the school and determine what further action is required during the period of provisional accreditation. If the school fails to make satisfactory progress in addressing issues identified by the Authority or fails to submit reports, the Authority may withdraw provisional accreditation.

Provisional accreditation will not be extended beyond four (4) years. If a school fails to progress beyond this status within four years CAAM-HP will withdraw the school's accreditation and request the school to re-apply within three (3) years. The decision to withdraw accreditation is subject to appeal. See Appendix H *Policy and Procedures for Appeal of Adverse Accrediting Actions*.

Accreditation Granted

Granted for a maximum period of the length of the academic programme

The Authority may grant accreditation to a programme based on the determination that the programme meets the accreditation standards and the school has demonstrated the capacity by its governance, administration and education programmes to maintain those standards for the accredited period.

In making this determination the Authority will rely on the report of a survey visit. The Authority will detail any areas of weakness to the administration of the school and the stated period within which the school is expected to address the issues and demonstrate compliance.

The Authority will receive and examine annual progress reports from the school and determine what further accreditation action is required during the period of accreditation.

Accreditation Denied

The Authority may deny initial accreditation to a programme based on the determination that the programme has not substantially met the required accreditation standards and the school is unlikely to make adequate progress towards meeting the standards within a three-year period or the school has failed to substantially meet the standards during four (4) years provisional accreditation.

In making this determination the Authority will rely on the report of a survey visit to the school.

A school which has had the accreditation of its programme denied may not re-apply for accreditation for at least three (3) years from the effective date of denial.

Accreditation Denied is subject to appeal. See Appendix H (Policy and Procedures for Appeal of Adverse Accrediting Actions.)

Refusal to Consider for Accreditation

The Authority may refuse to consider a programme for accreditation. In making this decision the Authority will rely on the accreditation submission provided by the school and on documented third-party information, if relevant. The decision to refuse to consider a programme will be based on one or more of the following:

- a. The school's accreditation documentation is limited, incomplete or lacks sufficient substance to be evaluated against the standards
- b. The school has submitted falsified information or has demonstrated unethical behaviour which would have an impact on the programme and the operations of the school
- c. Less than three years have elapsed since a decision to withdraw, deny or refuse to consider for accreditation was made by the Authority.

A school refused consideration for accreditation may not re-apply for accreditation for at least three (3) years from the effective date of refusal.

Refusal to Consider for Accreditation is subject to appeal. See Appendix H (Policy and Procedures for Appeal of Adverse Accrediting Actions.)

SCHOOLS SEEKING CANDIDACY

Candidacy is the status granted to new programmes which the Authority reviews from the initial phase of development of the programme (New and Developing Schools).

Note that Candidacy is not accreditation and does not guarantee eventual accreditation. Candidacy merely indicates that a school has met the minimum standards to begin operations.

Candidacy Granted

Granted for a period of 2 years

The Authority may grant candidacy status to a new programme based on the determination that the programme has met the minimum standards as established in the document '*Accreditation Guidelines for New and Developing Schools*' and the school has in place the proposed education programme, governance, staff and facilities to begin operations. The proposed programme of governance, administration and education will be monitored on a yearly basis.

In making this determination the Authority will rely on the report of a survey visit. The Authority will detail any areas of weakness to the administration of the school and the stated period within which the school is expected to address the issues and demonstrate compliance.

The Authority will receive and examine annual progress reports from the school and determine what further action is required during the period of candidacy. If the school fails to make satisfactory progress in addressing issues identified by the Authority, the Authority may withdraw candidacy status.

Early in the final year of the programme a full evaluation is undertaken in order to make a determination on accreditation.

Candidacy Withdrawn

The Authority may withdraw candidacy based on the determination that a school with candidacy:

- Has not commenced teaching within two years of the date it was granted
- Has failed to submit annual progress reports
- Has not submitted the documents for a full accreditation visit by the date specified by the Authority in the final year of the programme.

In addition, the Authority may withdraw candidacy based on the relevant conditions detailed in Accreditation Withdrawn.

The Authority will decide the effective date of the withdrawal of candidacy status. The decision with respect to the effective date is not subject to appeal.

A school which has had its candidacy for a programme withdrawn may not re-apply for accreditation for at least three (3) years from the effective date of withdrawal.

Candidacy Withdrawn is subject to appeal. See Appendix H (Policy and Procedures for Appeal of Adverse Accrediting Actions.)

Candidacy Denied

The Authority may deny candidacy to a programme based on the determination that the programme has not substantially met the required minimum accreditation standards and the school is unlikely to make adequate progress towards meeting the standards within a three-year period.

In making this determination the Authority will rely on the report of a survey visit.

A school which has had the candidacy of its programme denied may not re-apply for candidacy for at least three (3) years from the effective date of denial.

Candidacy Denied is subject to appeal. See Appendix H (Policy and Procedures for Appeal of Adverse Accrediting Actions.)

Refusal to Consider for Candidacy

The Authority may refuse to consider a programme for candidacy based on the determination that:

- a. The school's candidacy documentation is limited, incomplete or lacks sufficient substance to be evaluated against the standards
- b. The school has submitted falsified information or has demonstrated unethical behaviour which would have an impact on the programme and the operations of the school

In making this determination the Authority will rely on the candidacy submission provided by the school and on documented third-party information, if relevant.

- c. Less than three years have elapsed since a decision to withdraw, deny or refuse to consider for candidacy was made by the Authority.

A school refused consideration for candidacy may not re-apply for candidacy for at least three (3) years from the effective date of refusal.

Refusal to Consider for Candidacy is subject to appeal. See Appendix H (Policy and Procedures for Appeal of Adverse Accrediting Actions.)

Note on Registration and Licensing Requirements for Medical Graduates Seeking Employment in CARICOM Territories

CAAM-HP IS NOT A REGISTRATION/LICENSING BODY

The following licensing examinations are currently accepted for practicing medicine in CARICOM territories

- CAMC
 - CAMC 1 & 2 and its equivalents
 - CAMC has recommended that PLAB examinations and certification are considered equivalent to CAMC 1 & 2
- USMLE
 - USMLE Steps 1 & 2 equivalent to CAMC 1
 - USMLE Step 3 equivalent to CAMC 2

ACRONYMS

CAMC – Caribbean Association of Medical Councils

USMLE – United States Medical Licensing Examination

PLAB – Professional and Linguistic Assessments Board of the General Medical Council of the United Kingdom

Appendix B

BASIS FOR ALLOCATION OF CAAM-HP 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, committee members and authority members, including transportation, subsistence, and other normal expenses incurred in attending CAAM-HP meetings and consultation visits, and other accreditation-related business. Budgets for site visits cannot be determined prior to the appointment of a team as travel costs depend on the origin of team members.
3. Office expenses. Courier and messenger services, postage, supplies, telephone, printing and duplication, and other services related to activities of the CAAM-HP, including but not limited to preparation and distribution of final reports, pre-survey forms, annual CAAM-HP 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-HP.
5. Meeting expenses. Actual costs of food, meeting rooms, etc., for scheduled CAAM-HP meetings and conferences.
6. Legal counsel. Fees and expenses for outside legal counsel to attend CAAM-HP 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.

Appendix C (Revised July 2018)

SCHEDULE OF FEES

Fees Charged by the CAAM-HP

As set out in the document, *Procedures of the CAAM-HP*, one of the important functions of the CAAM-HP is to determine fees payable by institutions in connection with the accreditation of their programmes. In addition, one of the sources of revenue is income derived from earnings for services provided by the Authority. Recent experiences have revealed the need for the revision of fees.

Effective August 1, 2018 CAAM-HP's fees are as follows:

1. Schools applying for accreditation for the first time pay an administrative fee of US\$ 15,000.00, US\$2,500.00 for each additional campus and US\$5,000.00 per hospital (clinical affiliate) to be visited on each visit.
2. Schools with accredited programmes pay an annual fee of US\$2,000.00 for every 100 new students admitted in a calendar year as a condition of maintaining accredited status.
3. At the time a school submits a Notice of Appeal it must also submit a non-refundable fee of US\$1,500.00 and an additional US\$6,000.00 as a deposit on the payment of costs (a total of US\$7,500.00) made payable to the Authority.
4. Schools in non-CARICOM member countries requesting accreditation services from CAAM-HP are required to pay the administrative fee of US\$20,000.00 plus a service fee of US\$10,000.00. For the Spanish-speaking countries an additional cost for translation of documents will be included.
5. Schools requesting consultation services from CAAM-HP are required to pay a fee of US\$10,000.00 in addition to meeting the consultant's (Secretariat staff) airfare and accommodation costs.
6. CAAM-HP charges fees for an accreditation review which include travel and accommodation costs and honorarium for site visit teams. An administrative fee of US\$10,000.00 will be included in the budget for each site visit.
7. Team chairs and team secretaries receive an honorarium of US\$400.00 per day each and team members US\$300.00 per day. In addition, the team secretary receives US\$1,500.00 for preparation and submission of the site visit report.
8. Governments applying to the National Committee on Foreign Medical Education and Accreditation (NCFMEA) of the US Department of Education for initial determination and redetermination of comparability will be required to pay CAAM-HP an administrative fee of US\$15,000.00.

Appendix D

CONFLICT OF INTEREST GUIDELINES AND STATEMENT FOR CAAM-HP 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-HP.

1. A CAAM-HP representative will not participate in a site visit, in discussions during CAAM-HP meetings, or in a vote regarding any of the following schools:
 - a. A school with which the CAAM-HP 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-HP representative
 - c. A school which has substantial cooperative or contractual arrangements with the school of the CAAM-HP representative or an immediate family member
 - d. A school which has engaged the CAAM-HP 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-HP representative or an immediate family member has any financial, professional or other interest that may conflict with the interests of the CAAM-HP.
2. A CAAM-HP representative will not act as an external consultant on accreditation matters to any school subject to CAAM-HP accreditation unless such consultation is requested by and conducted on behalf of the CAAM-HP.

3. Definitions

CAAM-HP representative: A CAAM-HP member, staff member, or surveyor.

Immediate Family Member: A spouse, life partner, child, parent, or sibling of a CAAM-HP representative.

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.

CAAM-HP 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 Executive Director in consultation with the Chair.

See next page for Conflict of Interest Declaration Form

Declaration re-Conflict of Interest

Each CAAM-HP representative will sign the following declaration:

I have read the policy document titled '*Conflict of Interest Guidelines and Statement for CAAM-HP Members, Staff and Surveyors.*'

I understand the policy and I agree to be bound by its terms.

Name

Signature

Date

Appendix E

CONFIDENTIALITY STATEMENT FOR CAAM-HP MEMBERS, STAFF, AND SURVEYORS

I understand that in connection with my membership on or service to the Caribbean Accreditation Authority for Education in Medicine and Other Health Professions (the "CAAM-HP"), that I will be exposed to confidential information relating to the accreditation of undergraduate medical or other health professions education programmes. In order to protect such confidential information, and the CAAM-HP'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-HP.

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

Name

Signature

Date

Appendix F

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-HP through the Secretariat.
2. After review and deliberation, the CAAM-HP, if it affirms the recommendation(s), adopts proposed wording for such changes.
3. CAAM-HP 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-HP's website at www.caam-hp.org, inviting comments on the proposed standards. Responses are to be sent to the Secretariat at least four weeks before the next regular meeting of the CAAM-HP.
4. The CAAM-HP 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-HP meeting at which the standards are to be adopted.
5. If there is substantial disagreement with the proposed standard, the CAAM-HP may either reject the proposed standard or ask the Secretariat to prepare a revised draft for reconsideration by the CAAM-HP.
6. Should the CAAM-HP 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-HP specifies.

Appendix G

OBSERVERS ON CAAM-HP SURVEY VISITS

Observers from Accrediting Agencies, Education or Health Departments

The CAAM-HP notifies annually the Contracting Parties through 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-HP survey team meetings, they should apply to the Secretariat to do so. The Secretariat, after consultation with the institution under review, will approve what meetings observers may attend.

Observers may participate in the discussions with school parties only to the extent that the business of the CAAM-HP survey team is not delayed or compromised. Observers are not to solicit the findings or conclusions of CAAM-HP 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. However, the CAAM-HP Secretariat may assume this responsibility. The observer(s) may attend the CAAM-HP 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-HP.

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 or other health professions education. The request will be considered by the Executive Director in consultation with the Chair. If the CAAM-HP 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.

POLICIES AND PROCEDURES FOR APPEAL OF ADVERSE ACCREDITING ACTIONS

Introduction

A school subject to an adverse action affecting the accreditation status of a programme is entitled to request an appeal of the Authority's decision by an independent panel in accordance with the procedures outlined in this document *Policies and Procedures for Appeal of Adverse Accrediting Actions*.

An adverse accrediting action is formal action taken by CAAM-HP to withdraw, deny or restrict accreditation of a programme submitted to CAAM-HP for accreditation review.

The purpose of the appeal process is to provide the school with an opportunity to request an independent review of an adverse accrediting decision for the purpose of determining whether the decision of the Authority was made in accordance with the standards and the evidence and whether the accreditation process was undertaken in keeping with the policies and procedures of CAAM-HP.

A school that receives notice of an appealable adverse action may, in accordance with this appeal policy, file in writing **within seven (7) days of receipt of the adverse decision**, a notice of appeal of the action prior to the action becoming final. The accreditation status of a programme remains in effect until the completion of the appeal process.

A school may withdraw its request for appeal in writing at any point during the process. However, the school is responsible for all costs incurred by CAAM-HP as of the date of the withdrawal.

The appeal process is an administrative, not a judicial proceeding and therefore, is not subject to legal rules of evidence, cross examination, subpoena of witnesses, objections to testimony etc. Throughout the process the burden of proof rests with the school to demonstrate clear and credible evidence to support one or more of the grounds for appeal.

The appeal will be carried out **within six months** so as to ensure the protection of the public interest and fairness to the school.

Actions of the CAAM-HP subject to Appeal

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

- a. Accreditation on Probation
- b. Accreditation/Candidacy Withdrawn
- c. Accreditation/Candidacy Denied
- d. Refusal to consider for Candidacy

The appeal process provides the school with a right to review based on both an assessment of written submissions provided by the school and an oral hearing. The decision of the Appeals Panel is final.

The school should submit its request for appeal electronically to the Executive Director and mail one (1) original and three (3) copies to the CAAM-HP Secretariat.

Responsibility for the Cost of Appeal

The costs of the appeal **(Please refer to Appendix C, point 3)** include, without limitation, the following administrative expenses: honoraria for panel members, the cost of reproducing the record and any other materials for the panel members and the school, costs associated with the conduct and recording of the hearing, costs related to electronic communication (video-conferencing, conference calls etc.), facilities and rental of equipment. Costs of appeal do not include the costs of the legal fees of the Authority or legal fees or other expenses incurred by the school in bringing the case.

If the final cost of the appeal is less than the amount of the deposit, CAAM-HP will refund the school the excess funds. If the expenses exceed the amount of the deposit, CAAM-HP will bill the school for the additional funds.

If the appeal is determined in the school's favour, CAAM-HP will be required to refund the school 75% of the administrative costs as specified above.

Responsibility of the CAAM-HP Secretariat

The CAAM-HP Secretariat is responsible for reproducing and sending all documentation concerning the appeal, providing general support services to the appeals panel, and making arrangements for the conduct of the appeal.

Dismissal of Defective Appeal Requests

The Chair of CAAM-HP in consultation with the Executive Director, CAAM-HP, may dismiss an appeal as administratively defective if the school fails to abide by these procedures, including without limitation:

- a. failing to file a timely Notice of Appeal
- b. failing to specify the specific grounds for the appeal in the Notice of Appeal with supporting evidence
- c. failing to submit the required fee or deposit against costs
- d. not being current in the payment of its fees to the Authority and not settling the payment of arrears within one (1) week of being advised that the Appeal would be dismissed if payment were not remitted immediately.

Panel Membership

Three (3) qualified persons will be appointed to serve as members of an appeals panel by the Executive Director of the CAAM-HP in consultation with the Chair of CAAM-HP and a Panel Chair identified. Panel members may be former CAAM-HP members or persons who otherwise meet the qualifications for membership of the CAAM-HP. Persons who have participated in a site visit to the school or who have a conflict of interest as determined under the CAAM-HP Conflict of Interest Guidelines shall not be eligible to serve on the appeals panel. These *Guidelines* are set out in Appendix D of this document

The CAAM-HP Secretariat will inform the school of the composition of the panel within four (4) weeks of the Notice of Appeal. The school may challenge the participation of any panel member for possible conflict of interest or other cause in writing within two (2) weeks of receiving the notification. Final decisions regarding such perceived conflict of interest or other cause for challenge remain at the discretion of the Executive Director of the CAAM-HP in consultation with the Chair of CAAM-HP.

Confidentiality

Members of an appeals panel shall keep confidential any information provided by the school or information gained as a result of participating in the appeal. Maintenance of confidentiality continues after the process has concluded. Panel members are required to sign the CAAM-HP conflict of interest declaration and confidentiality statement.

Assessment of the Appeal

The Appeals Process

The appeals process consists of a review of written submissions by and a hearing before an independent Appeals Panel. The appeals hearing is closed to the public and attendance is limited to only the necessary representatives of the school and CAAM-HP. Persons who have a conflict of

interest as determined under the CAAM-HP *Conflict of Interest Guidelines* shall not be present for or participate in a hearing.

Once the independent appeals panel has been established, the school shall not under any circumstances contact or communicate with panel members concerning the matter under appeal. Such action will result in the denial of the appeal by the Chair of the panel.

The CAAM-HP Secretariat provides each member of the Panel and the school with a copy of the following materials, which shall constitute the Appeals Record:

1. sections of the minutes and relevant documentation from the CAAM-HP Board meeting resulting in the original adverse decision
2. any additional documents available to the CAAM-HP bearing on the substance of the appeal or upon which the Authority relied in making its decision
3. the CAAM-HP letter informing the school of the adverse action
4. the school's Notice of Appeal with supporting documents
5. *Procedures of the CAAM-HP* and the relevant *Standards of Accreditation*

The Appeals Panel may request and consider any additional information it deems necessary for purposes of clarification. Any such information shall become part of the Appeals Record.

The members of the Appeals Panel may consider the materials independently before discussing the issue electronically (e-mail, video-conferencing, etc.). The Panel may find it necessary to consult with the Executive Director, CAAM-HP or legal counsel regarding the CAAM-HP policy and procedural issues.

Timing of and Representation at the Appeals Panel Hearing

Within four (4) weeks of the confirmation of the independent Appeals Panel, the Executive Director of the CAAM-HP in collaboration with the Chair of the Panel shall determine a suitable date, time and place of the hearing and notify the school in writing four (4) weeks prior to the hearing date. The Hearing may be held electronically (video-conferencing, conference call, etc.). The notice shall advise the school that it

1. may send representatives to appear before the Appeals Panel
2. may be represented by legal counsel.

The school's written intent to send representatives to appear before the Appeals Panel, the names of the representatives and the legal counsel, if applicable, who will attend the hearing, must be received by the CAAM-HP Secretariat no later than two (2) weeks before the scheduled date of the hearing. Persons not identified in this letter may not appear before the Panel.

The Appeals Panel makes its decision based on the Appeals Record only with no further opportunity for an appearance by the school, if the school fails to:

- a. submit its intent to be represented at the hearing within the scheduled time-frame

- b. appear before the Appeals Panel without good cause

The school may waive its right to appear before the Appeals Panel in writing **at least two (2) weeks** before the scheduled date of the hearing. In such a case the Chair of the panel will schedule a meeting at a date convenient to panel members to consider the case based on the Appeals Record. The meeting may be held electronically (video-conferencing, conference call, etc.). The decision of a school to waive its right to appear before the Appeals Panel is final.

During the hearing, CAAM-HP is represented by the Chair (or designee), the Executive Director and one other member of the Authority. The Executive Director in consultation with the Chair determines whether CAAM-HP will also be represented by legal counsel.

Conduct of the Hearing before the Appeals Panel

The hearing is presided over by the Chair of the independent Appeals Panel whose determinations of procedural matters and the admissibility or otherwise of evidence is final.

The hearing shall adhere to the following format:

Session 1

- Introductory statement by the Chair of the Appeals Panel
- Oral presentation by the school (no more than one hour)
- Oral presentation by the Chair of CAAM-HP or designee (no more than 30 minutes)
- Questions by the Appeals Panel members

Session 2

- Appeals Panel Private Session

Session 3

- Additional questions by the Appeals Panel if necessary
- Closing statement by the school (no more than 10 minutes)
- Closing statement by the Chair of CAAM-HP or designee (no more than 10 minutes)

Session 4

- Appeals Panel Executive Session (private)

Session 5

- Oral Presentation of Decision of the Appeals Panel by the Chair
- Adjournment

The hearing is recorded electronically and copies of the recording made available to the school. The recording does not include the deliberations of the Panel or votes taken. The school may request a transcript of the recording at its own expense. The school and CAAM-HP representatives shall not attend the private panel sessions.

Decision of the Appeals Panel

The Appeals Panel shall consider the Appeals Record and the oral presentations during the hearing. The Panel's determination shall be made by majority vote. The Chair of the Panel will present the decision of the panel orally to the school and to the CAAM-HP.

The Appeals Panel shall take one of the following actions based on the balance of evidence:

1. Affirm the adverse action
2. Modify or reverse the adverse action

The Appeals Panel shall affirm the Authority's decision if the school fails to demonstrate clearly and credibly that the Authority's action was not supported by the evidence, or was not in substantial accordance with CAAM-HP's policies and procedures or there were errors in the proceedings which materially affected the decision of the Authority.

The Appeals Panel shall modify or reverse the Authority's decision if the school establishes clearly and credibly that the Authority's action was not supported by the evidence, or was not in substantial accordance with CAAM-HP's policies and procedures.

The Panel will prepare a written report to be submitted to CAAM-HP normally within two (2) weeks of the hearing. The report should include the following:

1. Activities: A brief summary of the activities of the Panel pertaining to the case, including dates and purpose of any meetings or conference calls and the persons involved
2. Findings: A statement responding to each of the issues brought forth in the school's Notice of Appeal, including a brief description of reasons for the Panel's determination regarding each issue
3. Decision: The decision of the Appeals Panel
4. Action required by CAAM-HP: a statement of any matters which must be addressed by the Authority
5. Signatures: The report will be signed by each member of the Appeals Panel

The CAAM-HP Secretariat shall formally notify the school in writing of the decision of the Appeal Panel, and provide a copy of the panel's report, no later than two (2) weeks following the submission to the CAAM-HP Secretariat.

If the decision is affirmed or modified, the decision becomes effective on the date of the notification letter and will be published. If the decision is reversed, the decision is effective from the date of the last accrediting action.

The decision of the Appeals Panel shall constitute the final action by the CAAM-HP, and shall not be subject to further review or appeal.

Notification of Accreditation Status

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

If the CAAM-HP's final action is to withdraw or deny accreditation, the school shall be required to notify all students enrolled in the programme, those accepted for enrolment, and those seeking enrolment. The school shall provide the CAAM-HP Secretariat with a copy of such notification within four (4) weeks after receiving notice of the final action by the CAAM-HP withdrawing or denying accreditation.

The school must notify the relevant government authority in its jurisdiction of any change in its accreditation status or denial of accreditation. The school shall also notify others, on request, of its accreditation status.

CAAM-HP will publicise the decision of the Appeals Panel on its website: www.caam-hp.org

Appendix I

PROCEDURES FOR HANDLING COMPLAINTS ABOUT PROGRAMME QUALITY

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

Submitting a Complaint

Complaints must be made in writing, and the complainant identified by name, email address, mailing address and telephone number. If these instructions are not followed, 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-HP Secretariat will contact the complainant

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

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

The CAAM-HP 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-HP, their respective attorneys, and other persons authorised by the dean, required by law or necessity, at the discretion of the CAAM-HP, 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-HP, 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-HP.

Investigating a Complaint

The CAAM-HP Secretariat will make an initial determination of whether the complaint contains issues relating to the programme's compliance with accreditation standards.

If the CAAM-HP 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-HP at the next regularly scheduled CAAM-HP meeting. The CAAM-HP 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-HP has made a determination, but not of the outcome, and that the determination has been entered into the confidential file of the institution.

Appendix J

GUIDELINES AND PROCEDURES RELATING TO SCHOOL CLOSURE/PROGRAMME DISCONTINUATION, 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-HP accredited educational programme in the event of school closure/programme discontinuation or merger/change of ownership.

School Closure/Programme Discontinuation

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-HP 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-HP staff or its representatives 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/clinical experiences or electives at another accredited institution.
 - c. Pre-clinical 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-HP.

Termination of Accreditation for Programmes that are closing

1. In the absence of an adverse CAAM-HP 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-HP action to withdraw accreditation, it would generally be withdrawn at the end of the academic year in which the CAAM-HP action was taken. By vote of the CAAM-HP, accreditation may be continued for an additional year if special circumstances warrant.

The CAAM-HP Secretariat will notify the contracting parties through the CARICOM Secretariat, 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-HP in closure

In the event of school closure/programme discontinuation, the CAAM-HP 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/programme.

Accredited schools planning to accept transfer students from a school/programme that is closing should notify the CAAM-HP so that an assessment of the adequacy of their resources for the increased class size can be made.

School Merger/Change of Ownership

In the case of a 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 enrolment be made in the entering class, not at the expense of existing students.

The CAAM-HP 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:

1. 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.
2. 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.

Upon receipt of the notice of plans for change of ownership or merger, the CAAM-HP 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-HP at its next meeting.

Reconsideration of Accreditation by the CAAM-HP

Upon reviewing the report of the Secretariat and the school plan, the CAAM-HP 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-HP 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-HP 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-HP action.

Appendix K Documents available from the CAAM-HP

- Summary of the Accreditation Procedures for Established Schools
- Procedures of the Caribbean Accreditation Authority for Education in Medicine and Other Health Professions
- Standards for the Accreditation of Medical Schools in the Caribbean Community
- Standards for the Accreditation of Dental Schools in the Caribbean Community
- Standards for the Accreditation of Veterinary Schools in the Caribbean Community
- Standards for the Accreditation of Degree Nursing Programmes in the Caribbean Community
- Standards for the Accreditation of Nutrition and Dietetics Degree Programmes in the Caribbean Community
- Accreditation Guidelines for New and Developing Schools
- Students' Role in the Caribbean Accreditation Authority for Education in Medicine and Other Health Professions
- Guidelines For Accreditation Survey Visits
- Guide for Writing a Report on a Visit of a Survey Team
- Guide to the Institutional Self-Study for Programmes of Education in Medicine
- Guide to the Institutional Self-Study for Programmes of Education in Dental Medicine
- Guide to the Institutional Self-Study for Programmes of Education in Veterinary Medicine
- Guide to the Institutional Self-Study for Degree Programmes of Education in Nursing
- Instructions for Completing the CAAM-HP Medical Education Database and Institutional Self-Study
- Instructions for Completing the CAAM-HP Dental Education Database and Institutional Self-Study
- Instructions for Completing the CAAM-HP Veterinary Education Database and Institutional Self-Study
- Instructions for Completing the CAAM-HP Nursing Education Database and Institutional Self-Study
- Medical Education Database
- Dental Education Database
- Veterinary Education Database
- Nursing Education Database
- Database Form for Required Courses and Clerkships for Medicine
- Database Form for Required Courses and Clerkships for Dental Medicine
- Database Form for Required Courses and Clerkships for Veterinary Medicine
- Database Form for Required Courses and Clerkships for Nursing
- Annual Medical School Questionnaire
- Annual Dental School Questionnaire
- Annual Veterinary School Questionnaire

All of the above documents are available on the CAAM-HP website at: www.caam-hp.org