

## ADDITIONAL ELIGIBILITY CRITERIA

### *FOREIGN MEDICAL SCHOOLS, VETERINARY SCHOOLS, AND NURSING SCHOOLS*

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In addition to the eligibility requirements that satisfy the basic eligibility criteria, foreign graduate medical schools, foreign veterinary schools, and foreign schools which offer nursing programs must comply with additional eligibility criteria to be eligible to participate in the William D. Ford Federal Direct Loan (Direct Loan) Program.

For a Foreign for-profit medical, veterinary, or nursing school—

1. No portion of an eligible medical or veterinary program offered may be at what would be an undergraduate level in the United States; and
2. The *Title IV, HEA* program eligibility does not extend to any joint degree program, offered through a collaborative partnership with another institution.

### **Foreign Graduate Medical School Criteria**

Under current regulations, the Secretary considers a foreign graduate medical school to be eligible to apply to participate in the Direct Loan Program if, in addition to satisfying all basic eligibility criteria, the school, whether freestanding or subsumed within a university, must satisfy all of the following criteria:

- The school provides, and in the normal course requires its students to complete, a program of clinical and classroom medical instruction of not less than 32 months in length, that is supervised closely by members of the school's faculty and that is provided either—
  1. Outside the U.S., in facilities adequately equipped and staffed to afford students comprehensive clinical and classroom medical instruction; or
  2. In the U.S., through a training program for foreign medical students that has been approved by all medical licensing boards and evaluating bodies whose views are considered relevant by the Secretary.
- The school has graduated classes during each of the two 12-month periods immediately preceding the date the Secretary receives the school's request for an eligibility determination.
- The school employs for the program described above only those faculty members whose academic credentials are the equivalent of credentials required of faculty members teaching the same or similar courses at medical schools in the U.S.
- The school must be located in a country that have been reviewed by the National Committee on Foreign Medical Education and Accreditation (NCFMEA) <https://sites.ed.gov/ncfmea/>

and found to use standards to accredit their medical schools that are comparable to the standards used to accredit medical schools in the United States.

- The school is accredited by the NCFMEA approved medical accreditor.
- The school satisfies the accreditation requirements of the State Agency, if applicable.
- A post-baccalaureate/equivalent medical program must require accepted U.S. students to have taken the Medical College Admission Test (MCAT) and reported their scores. Medical (MD) schools must have a requirement in place, for their students accepted for admission as graduate entry:
  - As having taken the MCAT, and for their students to report their scores to their institution;
  - And in order for the school to comply with this requirement the school must determine what consent they need from their students to achieve this.
- Schools must submit to its accrediting authority and on request to the Secretary by April 30 of each year –
  - MCAT scores of all U.S. students admitted during the preceding calendar year.
  - Accompanied with a statement of the number of times each student took the MCAT.
  - Percentage of students graduating during the preceding calendar year (including at least all U.S. graduates) who obtain placement in an accredited U.S. medical residency program.
- **Schools must submit to the U.S. Department of Education (the Department) on an annual basis by April 30 of each year –**
  - All student and graduate USMLE scores for each step/test and attempt for the preceding calendar year ending December 31, together with dates students took each test, including failed tests.
  - All participating foreign graduate medical schools and those seeking initial eligibility to add its MD program in their scope of eligibility should request a Special Report from Educational Commission for Foreign Medical Graduates (ECFMG) and submit it as supporting documentation for review by FSA. The school's Special Report created by ECFMG needs to be disaggregated by step/test and attempts. This report was specifically created for foreign medical schools that captures their USMLE individual student performance data they certified for its last three performance period.
  - Citizenship rate for preceding calendar year

### **Clinical Training Requirements**

- A foreign graduate medical school must have a valid formal affiliation agreement with each hospital or clinical locations at which all or portion of its MD program's core or required or elective clinical rotations are provided; and
- Formal affiliation agreement or other written arrangements with any hospital/clinic where all or portion of its clinical rotations that are not required are provided;

- Except for those clinical locations **not used regularly or not offered** by the institution, but instead are chosen by students themselves, limited to two electives and no more than 8 weeks total.

Agreements must address the following:

- Maintenance of school's standards
- Appointment of faculty to the medical school staff
- Design of the curriculum
- Supervision of students
- Evaluation of student performance
- Provision of liability insurance

For each signed formal clinical affiliation agreements with hospitals or clinics to be valid, the agreement must state how the following 6 elements will be addressed at each clinical site.

- **Institutions are required to submit their preceding Calendar Year Individual USMLE Test-Taker Performance Data and USMLE Pass Rates for Step 1 and Step 2-CK; Citizenship Rates; and Medical Consumer Information to the Department by the following April 30.**

Submission to the Department of the USMLE test data and rates, citizenship rates, and consumer information described in [Dear Colleague Letter \(DCL\) GEN-22-01](#).

### USMLE Pass Rate Percentage

- The annual 75% pass rate is required for students and graduates who, as first time takers, took Step 1 or Step 2-CK of the medical exams administered by the ECFMG in the preceding calendar year. **Note:** Step 2 Clinical Skills (CS) test is now permanently canceled and is not part of the calculation. Refer to [Requirement for Foreign Medical Schools to Submit Scores for the United States Medical Licensing Examination \(USMLE\) Step 2-CS](#).
  - Student Performance Data - For each student and graduate who took any test during the calendar year:
    - Student identifier
    - Date(s) of tests taken
    - Test scores, including any failed scores
- Exemption for schools with a State-approved clinical training program as of Jan. 1, 1992, and the school has continued to operate a clinical training program in at least one State that approves the program. A foreign MD school meets the 1992 exclusion if they can show proof.
- Canadian Medical Schools and those that met the 1992 exemption are excluded from the minimum threshold calculation.
- Exemption for Canadian Medical Schools - Canadian medical schools are exempt from the 75% aggregate threshold calculation but are not exempt from submitting the Student Performance Data.

- USMLE Data - The Institution's USMLE pass rates and Individual USMLE Test-Taker Performance Data for USMLE exams taken during the calendar year ending December 31. The USMLE exam results should be accompanied by a transmittal letter on your institution's letterhead that is signed by the institution's Vice-Chancellor, President or CEO, or appropriate designee, and contains your school's computation of its USMLE pass rates.

### **Citizenship Requirement**

- At least 60% of students and graduates do not meet U.S. citizenship or residency requirements for Federal Student Aid.
- Foreign medical school is exempt from the 60% citizenship percentage if institution had State-approved clinical training program as of Jan. 1, 2008, and continues to operate such a program in at least one State that approves the program. A foreign MD school meets the 2008 exclusion if they can show proof.
- Citizenship Data - Citizenship rates must be provided by the foreign graduate medical school in writing on your institution's letterhead and likewise signed by the official responsible for medical school certification in the Direct Loan Program.

### **Consumer Information**

- Instructions for submitting the required consumer information on U.S. student completion rates and student loan debt levels.

### **Calculation of Aggregate Pass Rate**

- Numerator for each Step test: Any of the students or graduates in the denominator who achieved a passing score on that Step/test.
- Denominator for each Step test: Each student who took the Step/test for the first time in the preceding calendar year, and Each person who took the Step/test for the first time in the preceding calendar year and who graduated from the school either during that year or the two calendar years immediately preceding.

To calculate Step aggregate pass rate, school need to divide number of students/graduates who passed step test by the total number of students/graduates who took Step test for the first time for the reporting period.

A graduate is a student who graduated from the school during the three years preceding the reporting year.

Federal regulations permit combination of the results on all two tests, provided the denominators, when combined, equal at least eight test attempts.

If combined, there are still fewer than eight attempts, the school receives a "no score" status for that year and data from subsequent years are added until at least eight test takers are achieved.

### **Medical Schools Satisfactory Academic Progress**

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

- Is no longer than 150% of published length of program.

- Is divided into increments, not to exceed lesser of one academic year or ½ published length of program.
- Include schedule established by school designating minimum percentage or work that student must complete at end of each increment to complete program with maximum timeframe.
- Include specific policies defining effect of course incompletes, withdrawals, repetitions, noncredit remedial courses on satisfactory progress.

To be eligible for FSA program funds, a student must make satisfactory academic progress, and institutions must have a reasonable policy for monitoring that progress.

An institution's SAP policy must specify the quantitative standard (pace of completion) at which students must progress through their program to ensure that they will graduate within the maximum timeframe, and each academic progress check must measure this.

### **Basic Science and Clinical Locations**

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

All clinical training portion of its program, must be in a country whose medical school accrediting standards are comparable to U.S. standards as determined by the NCFMEA, except for exempt clinical training sites, or clinical sites located in the U.S.

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

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

A clinical training site located in a foreign country other than the country in which the main campus is located or in the U.S. is not required to meet above requirements if –

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

## Foreign Veterinary School Criteria

Under current regulations, the Secretary considers a foreign veterinary school to be eligible to apply to participate in the Direct Loan Program if, in addition to satisfying the basic eligibility criteria, the school, whether freestanding or subsumed within a university, satisfies all of the following criteria:

- No portion of the foreign veterinary educational program offered to U.S. students, other than the clinical training portion of the program may be located outside of the country in which the main campus of the foreign veterinary school is located.
- The school is accredited by an organization acceptable to the Secretary for the purpose of evaluating veterinary programs in accordance with 34 CFR 600.56.
  - American Veterinary Medical Association (AVMA) – approval expires 6/23/2027
  - Australasian Veterinary Boards Council (AVBC) – approval expires 6/23/2027
  - European Association of Establishments for Veterinary Education (EAEVE) – approval expires 2024
  - Royal College of Veterinary Surgeons (RCVS) – approval expires 6/23/2027

To view list of ED recognized accrediting agencies, go to

<https://www.ed.gov/accreditation>.

- The school provides, and in the normal course requires its students to complete, a program of clinical and classroom veterinary instruction that is supervised closely by members of the school's faculty, and that is provided either—
  - Outside the U.S., in facilities adequately equipped and staffed to afford students comprehensive clinical and classroom veterinary instruction; or
  - In the U.S., through a training program for foreign veterinary students that has been approved by all veterinary licensing boards and evaluating bodies whose views are considered relevant by the Secretary.
- The school has graduated classes during each of the two 12-month periods immediately preceding the date the Secretary receives the school's request for an eligibility determination.
- The school employs for the program described above of this section only those faculty members whose academic credentials are the equivalent of credentials required of faculty members teaching the same or similar courses at veterinary schools in the U.S.
- For a veterinary school that is public or private nonprofit, the school's student may complete their clinical training at an approved veterinary school located in the United States or in the home country or at a veterinary facility in the home country that is approved by one of the evaluating foreign veterinary accreditors approved by the Secretary.
- For a veterinary school that is public or private nonprofit, the school's student may complete their clinical training at a veterinary facility located outside the United States or home country if it is included in the accreditation of a veterinary program accredited by the American

Veterinary Medical Association (AVMA); or no individual student takes more than two electives at the location and the combined length of the elective does not exceed eight weeks.

- For a veterinary school that is neither public nor private non-profit, the school's students complete their clinical training at an approved veterinary school located in the U.S.

## **Foreign Nursing School Criteria**

The *Higher Education Opportunity Act* created additional institutional eligibility criteria for foreign nursing schools, whether freestanding or subsumed within a university, satisfies all of the following criteria:

- The nursing school has an agreement with a hospital, or accredited school of nursing (as such terms are defined in section 801 of the *Public Health Service Act* (42 U.S.C. 296)), located in the U.S. that requires the students of the nursing school to complete the students' clinical training at such hospital or accredited school of nursing.
- The nursing school has an agreement with an accredited school of nursing located in the U.S. providing that the students graduating from the nursing school located outside of the U.S. also receive a degree from the accredited school of nursing located in the U.S.
- The nursing school certifies only Direct Loans for students attending the institution. The nursing school reimburses the Secretary for the cost of any loan defaults for current and former students included in the calculation of the institution's cohort default rate during the previous fiscal year.
- Not less than 75% of the individuals who were students or graduates of the nursing school, and who took the National Council Licensure Examination for Registered Nurses in the year preceding the year for which the institution is certifying Direct Loans received a passing score on such examination.