

# **REPORT OF THE STANDING COMMITTEE ON HEALTH**

PRESENTED BY  
SENATOR MRS. ROSHAN KHURSHEED BHARUCHA  
CHAIRPERSON COMMITTEE  
DECEMBER, 2005

## **SENATE SECRETARIAT**

Subject:- **REPORT OF THE STANDING COMMITTEE ON HEALTH**

1. Senator Roshan Khursheed Bharucha, Chairperson Standing Committee on Health, on behalf of the Committee, to present its Report on the floor of the House regarding solution of the problems of private medical colleges/universities/institutes about accreditation! Registration of their students by PMDC. The aforesaid sub-committee viz Senator Dr. Abdullah Riar, Convener, and Senators Dr. Mrs. Kauser Firdaus, Mrs. Razina Alam Khan, Dr. Nighat Agha and *Mr.* Azizullah Satakhzai, as its members was constituted by the Standing Committee on Health in its meeting held on 3<sup>rd</sup> April 2005 while discussing the Point of Order raised by Senator Kamil Ali Agha and Senator Saadia Abbasi, on the floor of the House, on 27<sup>th</sup> April 2005 on the issue of the registration of IMDC students and medical graduate doctors from Baqai Medical University Karachi and University of Health Sciences Lahore by PM&DC. The Sub-Committee was advised to submit its report at the earliest.
2. Senator Dr. Abdullah Riar, Convener, called 10 meetings/visits of the Sub-Committee to discuss the difficulties of private medical colleges/universities regarding their registration/accreditation by PMDC, after holding aforesaid meetings/ visits, the Sub-Committee prepared a draft report in this regard for submission to the Standing Committee on Health.
3. The Chairperson Standing Committee called a Standing Committee meeting on 30<sup>th</sup> November, 2005 in Committee Room No.1, Parliament House, Islamabad, for presentation of the Sub-Committee report for its approval.
4. The following members attended the meeting: 1  
Senator Roshan Khursheed Bhanichi Chairperson
2. Senator Abdullah Riar Member
3. Senator Razina Alam Khan Member
4. Senator Muhammad Azam Khan Swati Member
- 5, Senator Dr. Nighat Agha Member
6. Senator Justice ® Abdul Razzaq Thahim Member
5. Senator Dr. Abdullah Riar, Convener, Sub-Committee presented the report of the Sub-Committee. He briefed the Standing Committee about the various clauses of the report. After detailed discussion on it, the Standing Committee unanimously passed it. A copy of the report is attached.

(RASHID AHMAD)  
Secretary Committee

(SENATOR ROSHAN KHURSHEED BHARUCHA)  
Chairperson Standing Committee on  
Health

## SENATE SECRETARIAT

Subject:- REPORT OF THE SUB-COMMITTEE ON HEALTH REGARDING THE PROBLEMS FACED BY PRIVATE MEDICAL COLLEGES AND UNIVERSITIES REGARDING THEIR ACCREDITATION/ISTRATION BY PMDC.

### **Brief Background**

On a Point of Order raised by Senator Kamil Au Agha and Senator Saadia Abbasi. on the floor of the House on 27<sup>th</sup> April 2005 on the issue of the registration of IMDC students & Medical Graduate Doctors from Baqai Medical University, Karachi and University of Health Science Lahore by Pakistan Medical and Dental Council. The aforesaid issue was referred to the Standing Committee on Health for consideration. In this connection a meeting of the Standing Committee was called on 3rd May 2005 to look into the matter. It was brought to the notice of Committee that a large number of private medical universities/colleges/institutes and their students in the country are suffering, due to their non-registration/accreditation by PMDC. It also came to the notice of the Committee that inspite of repeated requests made by private medical institutes to the PMDC for completion of inspection formalities, the PMDC is delaying the process of inspection for accreditation/registration for one and other reason and consequently the graduate medical doctors are experiencing great hardships.

### **Constitution of Sub-Committee**

2. Keeping in view the difficulties faced by private medical institutes and their students a Sub-Committee was constituted by the Chairperson, Standing Committee on Health viz Senator Dr. Abdullah Riar, Convener and Senator Dr. Azizullah Stakazi, Dr. Mrs. Nighat Agha, Dr. Mrs. Kausar Firdaus and Mrs. Razina Alam Khan, to prepare a report at the earliest regarding solution of the problems of private medical colleges/universities about accreditation/registration of their students by PMDC and problems faced by medical profession (students, Doctors and Colleges) for submission to the Standing Committee on Health for further necessary action.

### **Terms of Reference**

- a. To address the difficulties/problems faced by private medical colleges/universities about accreditation/registration of their students by PMDC;
- b. To improve the standard of medical profession in the country; and
- c. To further improve the working and performance of PMDC;

### **Procedure adopted**

- i. Interviews/interrogatories/discoveries/Discussions and meetings with stake holders of medical profession
  - ii. On site inspections by the Sub-Committee to obtain feedback from the concerned institutions
3. The Sub-Committee held 10 other meetings/visits on the dates mentioned below:

<b><u>Date</u></b>	<b><u>Venue of the meeting / visit</u></b>
1. 3.6.2005	Visited IMDC and Civil Security, Hospital, Islamabad.
2. 6.6.2005	Parliament House, Islamabad.
3. 15.8.2005	Parliament House, Islamabad.
4. 26.8.2005	Pearl Continental, Lahore and visited Doctors Medical College, Lahore Medical and Dental College, Fatima Memorial Hospital, Lahore and University College of

- Medicine and Dentistry.
5. 30.8.2005 Visited Baqai Medical College, Agha Khan Medical College and Jinnah Medical College, Karachi.
  6. 3.10.2005 Meeting in Parliament House and visited Abbottabad International medical College, Frontier Medical College and Hazara Medical, College.
  7. 7.10.2005 Meeting held at the office of (Chairperson Standing Committee on Health old US Aid building. Islamabad.
  8. 10. 10.200. Visited Rawalpindi Medical College and Army Medical College, Rawalpindi.
  9. 1.11.2005 In the Office of the Chairperson Standing Committee on education.
  10. 28.11.2005 Parliament house. Islamabad.
- 4, Statements of the President. Private Association of Medication Institute (PAMI), Professor Dr. Ijaz Ahsan. Dean, Faculty of Health Sciences, Lahore, Professor M. Afzal Khan Niazi, Principal, Islarnahad Medial and Dental CoHege, Lt. Gen. ® Professor Dr. Syed Azhar Ahmed, Vice Chancellor, Baqai Medical University, Karachi, Mr. M. A., Rauf Chairman, BOG and Birg. ® Ajaib, Director General, University of Lahore, Dr. Shehyar Khan. Representative of Pakistan Medical Association. Representative of Pakistan Islamic Medical Association, Professor Jan Muhammad Memon, Vice Chancellor Liaquat Medical University, Sindh, Dr. M. Sohail Karirn Hashirni, Secretary PMDC, D.G. Health, Medical Students, Mr. A. J. Khan, Representative of Frontier Medical College and letter of Federal Secretary, Ministry of Health are at Annexure – A.

5.Details of the visits of the Sub-Committee are at Annexure-B.

6. After holding 11 meetings/visits the committee unanimously reached the following **observations** and **recommendations** based upon interviews/ interrogatories/ discoveries/ and on site inspections of various medical institutes:-

#### **A. OBSERVATIONS**

##### **Infrastructure of the medical colleges.**

The Committee unanimously observed that in the public and private sector medical colleges some of the facilities were adequate and sufficient to meet the standard of a medical institute but gross deficiencies and inadequacies were also noted in some of the recognized and un-recognized medical colleges.

##### **Teaching faculty**

- i. The Committee with an overwhelming unanimity was **of** the assessment that medical profession is facing gross deficiencies in the faculty of clinical sciences of the medical institutions in light of the criteria prescribed by PM&DC and acute shortage of basic science faculty is witnessed across the country in all categories of medical institutions.
- ii. Due to mushroom growth of private sector medical colleges and prevailing deficiencies and un-availability of teaching staff, a new phenomenon of part time teachers/faculty has emerged. The Limited ability of part timers is unable to withstand the demanding professional burdens of vigorous medical education. This situation is further compounded by the anomaly of dual employment of some to the teaching staff. This situation does not auger well for the

quality of teaching and standards of medical education.

### **Teaching hospital**

iii. It was noted by the Committee that for a medical college, teaching hospital is an essential tool *for* medical education, hence a laid down criteria of PMDC for mandatory requirement of the hospital with sufficient beds is the cardinal component of a medical college. It was also observed that some of the medical colleges in Pakistan possess sufficient teaching hospital infrastructure and are well equipped up to the modern standards of medical education which includes inpatient/outpatient teaching facilities.

Simultaneously a disappointing and dismal reality was also confronted by the medical profession where medical colleges with hundreds of students enrolled do not even possess a single teaching hospital bed and virtually non-existent outpatient teaching departments. It also noted with reservation a new culture of leased relationships with public sector hospitals and no financial ownership of the private medical colleges. Furthermore proximity of the hospitals and the teaching facilities were also found to be impractical.

### **(B) RECOMMENDATIONS**

7. Presently medical profession in Pakistan is at a critical cross road, if ignored, it would lead to a colossal set back to the profession and the standard of medical education.

The Committee while deliberating on the deficiencies of medical profession and the problems faced by PMDC analyzed the current reality in Pakistan, which is that more than 50 Medical and Dental Colleges are imparting medical education, and producing more than 4000 medical graduates per annum. 50% of the institutions are producing more than 25% of graduates in the private sector. Presence of unrecognized medical colleges having enrolled students of approximately 1000 is also noted with serious concern. In view of severe shortage of the basic sciences, teaching faculty and substantial inadequacy of clinical sciences staff as required by the PMDC regulations. It was unanimously agreed that the principal functions of PMDC (which was created through an Ordinance 1962, subsequently enacted by the Parliament in 1973) are as under:

(i) to establish uniform standards of education in medicine and dentistry.

(ii) To maintain a register of medical and dental practitioners.

(iii) To conduct inspection of all the teaching institutions to ensure a satisfactory infrastructure, training facilities and qualified teaching faculty.

(iv) To ensure discipline and ethical practices amongst all the registered practitioners.

ii. It was agreed by the members that undoubtedly PMDC has tried to meet the challenges given to it and has done good job in the earlier years. For multitude of reasons in the last decades it has fallen short of its responsibilities. This deficit of performance and the emergence of private sector in the field of medical education is due to the liberal policy of PMDC official of granting NCOs to private sector which led to various conflicts/disputes and protracted litigations. These deficiencies and lapses were further compounded by the lack of enforcement of standards in public and private sector colleges by the PMDC due to variable considerations in the past. The Committee also was critical of Ministry of Health for willingly conceding its powers to PMDC, which were enshrined upon the Central Government in the Ordinance of 1962.

### **iii. The Committee Members recommended the following:-**

a) An immediate **freeze** in the establishment of any medical college in public or private sector should be enforced until a fair stock of the situation is taken and the existing

deficiencies are corrected.

b) All those medical colleges which are currently operational without any NOC from PM&DC must be

immediately closed, with a defined track to absorb those students into a recognized medical colleges after meeting a prescribed criteria of PMDC. This view is further reinforced by the letter Federal Secretary Ministry of Health dated January 29, 2004 (see annexure), the committee strongly noted that some of the medical colleges' established in the private sector, are doing a dis-service to the medical profession and committing crime against the citizens of Pakistan and humanity at large. Punitive action must be taken against them with immediate effect.

c) All those existing medical colleges which are provisionally recognized or wish to be recognized must have a financial commitment and ownership in the teaching hospital within proximity of the medical college/campus and must be expected to establish a required teaching hospital facility as per Rules of PM&DC within a period of 02 years. After fulfilling all the requirements and disciplines of medical education as well as sufficient patient load to meet the inpatient and outpatient teaching requirements. Rental or Leased arrangements should not be treated as a primary hospital requirement of a medical college. Such relationships can only be a supplementary tool for teaching without affecting the number of students enrolled in the medical colleges.

d) The Committee observed that the current practice of provisional recognition of medical colleges beyond the 5 years period of medical curriculum of MBBS Degree is undesirable /unfair exercise and create imbalances in the medical standards. In the event a recognized medical college fails to maintain its PMDC laid standards it should be derecognized and the enrolled students should be offered a tract to be absorb in the other recognized medical college. PMDC should also be compliant with a standard procedure of inspections within a prescribed time frame after the submission of such request by the institutions.

e) The Committee further recommended to uphold better standards of medical education and create uniformity in public and private sector teaching institutions it is only fair to expect representation of private medical colleges in the PMDC.

f) The Committee unanimously observed and recommended that the medical college academic year must be brought in uniformity in both public and private medical colleges and the commencement of classes should be on the same calendar cycle.

g) Need for uniformity of the inputs in the medical colleges is also noted and it is observed that medical college entry test need to be standardized and conducted at a schedule in all provinces so that a standard criterion of admissions in public and private medical colleges need is strictly enforced. The enrolment of the students in public and private medical colleges in each province and Federal territory need to be synchronized. This may require coordination with the provincial intermediate boards. This measure would regulate the input of future medical students with a uniformity of standard.

h) All graduate medical Doctors must qualify' the national registration licensing examination conducted at least twice in a year by PMDC before granting registration to the medical graduate doctors hence establishing a uniformity in the graduating pool of doctors each year.

i) The Committee further noted that currently no practice of continued medical education

(CME) requirement is established for the practitioners of medical profession. It is expected of PMDC to enact Rules/Regulations to enforce the condition of CME requirements for recertification and renewal of licenses of medical practitioners at five year interval.

j) The Committee also recommended that no member of PMDC should have any conflict of interest of ownerships in private medical colleges.

k) Executive Committee of PMDC including the office of the President must be a full time paid position with a Secretariat overseeing the regulatory and academic aspects of its responsibilities with a provincial Secretariat and staff as well.

l) The Committee strongly observed that the contemporary requirement of medical profession and the capacity of PMDC and its mandate of 1962 Ordinance demands a fresh legislation/Ordinance which should incorporate the above said recommendations and empower an autonomous regulatory body of PMDC to enforce and implement its decisions in a transparent manner upholding the higher medical education and practicing standards.

m) Medical teaching faculty deficiencies can be addressed by rationalization of the faculty requirement for basic and clinical sciences. A work load finalization by the PMDC for the teaching faculty on the lines of standards established by Higher Education Commission would also assist to rectify this problem.

8. The Sub-Committee opined that PMDC should be enjoying the status of an autonomous professional body of higher standards of medical education with a transparent and effective regulatory controls and mechanisms. There should be no compromise on the standard of medical education in the country. Senator Dr. Abdullah Riar, Convener, Sub Committee thanked all the members of the Committee who took keen interest to finalize the report regarding solution of the problems of private medical institutions in the country about their registration accreditation by PMDC.

(RASHID AHMAD)  
Secretary Committee

(SENATOR DR. ABDULLAH RIAR)  
Convener Sub-Committee

### **STATEMENT OF PRESIDENT PRIVATE ASSOCIATION OF MEDICATION INSTITUTE (PAMI)**

It would be a truism to say that the standards of medical education have fallen in the last 4 decades, much before the private medical colleges were established. The PM&DC has not been able to check the deteriorating standards. Our graduates were preferred and welcomed in all the English- speaking countries of the world without any hindrance, which is no more the case. They now have to pass many examinations in order to be eligible to apply for training position in these countries.

The decline began when the existing public sector medical colleges started admitting hundreds of students in a college, which had facility only for 100 students. For example, it is on the record that all the public sector medical Colleges admitted over 400 students in the late 1970s and continues to admit large numbers even today. The Council remained helpless in regulating the public sector colleges and to this day they have almost no control on them.

The requirement of faculty on a student-teacher ratio is also extremely arbitrary as despite repeated requests, the Council has not been able to work out a workload of medical teachers, and without defined workload, it is not possible to recommend student-teacher ratio. Consequently, both the public sector and the private sector colleges have deficiency in faculty as required by the regulations of the Council. He gave example of 2 public sector colleges namely Chandka Medical College and Liaquat University of Health Sciences which clearly demonstrate the extreme deficiency of faculty, yet, both institutions have been given representation on the Council.

The Council *also* requires 50% beds in private teaching hospitals should be free, without defining what is meant by the word “free”. If by free, they mean no charges for beds & consultation fee which is provided by the public sector hospitals, then the private sector has no problem in providing these beds, However, there are other costs which are recovered from the patients by the public sector hospitals or patients are sent to private facilities for investigations etc. Neither the public sector nor the private sector can offer completely free medical treatment to every patient. Should this be a reason to deny us representation of the Council, then we would like to ask why the Agha Khan Medical College is given representation who neither have any free beds nor are included in the 1 and 5<sup>th</sup> Schedules of the PM&DC Ordinance. The requirement of free beds is to improve clinical teaching. Consequently the student bed ratio should be redefined as 1:2:50 free beds and not 1:5 which is ambiguous.

Regarding the overall infrastructure and requirement of equipment etc, private sector has agreed to the recently circulated proposal contained in the benchmark checklist. We have already submitted our proposal regarding student-teacher ratio on the basis of workload and amended Performa for inspection, which may be implemented by the PM&DC. PM&DC has repeatedly and rightly raised question of excessive admissions by some private sector colleges. Since the Council has not taken any notice of excessive admissions in the public sector colleges, some institutions in the private sector also felt encouraged to admit more students. PAMI feels that both public and private institutions admitting extra students should be reprimanded by the Council and impose an effective check. In this connection PM&DC regulation dated 7.8.1998 may be seen which inter alia directs that all public sector colleges should not admit more than 250 students and the optimum number of admissions for private medical/dental colleges shall be 100. This directive has been consistently flouted by the Council since then, the public sector colleges admitting more students have been condoned and admissions in several private colleges have been reduced to 50.

On the same token medical colleges not fulfilling the PMDC criteria must not be allowed to function. Such colleges in the past have looted parents academic and political environment in the country. Statutory and administrative control by ministry of health or any other body must not be allowed.

Repeated inspections of private medical colleges will never ensure minimum uniform standards as envisaged in the Ordinance. It amounts to micro-management of the colleges, which is beyond the capacity of any council. Some colleges have been inspected more than a dozen times in the last 5 years at a huge cost as they have to pay more than Rs.5.0 Lac for every inspection. Public sector colleges do not have to pay inspection fee. We have time and again suggested that the Council should institute a National Licensing Examination. Such examinations are now conducted in many countries. Only such an examination will ensure “Minimum Uniform Standards” of the graduates as well as lead the Council to ascertain weaker colleges producing poor graduates who are not able to pass licensing examination. The Council can then focus its attention on such colleges and guide them to improve their standards and eventually close them down if they do not improve. Inspections of the facilities in a college should only be held at the time of examination as is envisaged in the Ordinance. Comprehensive inspections may be limited to once in 5 years according to the existing rules.

As for reforms in the Council and stated that we have some concrete proposals. The Council must act within the legal framework as envisaged in the Ordinance. Those institutions whose graduates have been registered by the Council may be given immediate representation on the Council and the names of those institutions may be notified in the 4th and 5th schedules. By bringing in the private sector institutions, the Council becomes fully representative, stronger and more dynamic.

At present the Council meets twice a year and the Executive meets 5-6 times a year or as need arises. All the members of the Council and the executive are full time employed in their own institutions, hence they have no time to give to the Council. There is one Secretary who is overwhelmed with the entire activities of the Council and is at a loss to accomplish much. It is suggested that the Council should have 3 departments namely the Accreditation department headed by a senior professor responsible for dealing with the medical institutions, a Secretary responsible for registration and other administrative activities of the Council and a Financial Controller for managing the finances of the Council.

The private sector will fully cooperate with PMDC and all organs of the State in improving the standard of medical education. Our Association is developing stringent requirements of membership and will offer membership to only those institutions who have demonstrated capacity and ability to improve.

**STATEMENT OF PROFESSOR DR. IJAZ AHSAN**  
**DEANS FACULTY OF HEALTH SCIENCES, LAHORE**

LJCM&D was opened in the year 2000. Before launching the College, we submitted all the requisite documents to the PMDC.

2. We applied to PMDC to inspect the College for recognition.

The PMDC wrote to us that the College would be inspected after receipt of the charter of the University of Lahore.

4. It took the University two years to receive the Charter from the Government of the Punjab, which ultimately was granted on 2.10.2002

vide ordinance No.LXI of 2002. Soon after the grant of the Charter, we supplied copy thereof to the Council as per their requirements.

5. Nevertheless, inspection of the College by PMDC was carried out after a quite unexplained delay of eighteen months, on the 17<sup>th</sup> of June 2004.

6. The inspection report pointing Out deficiencies was sent by PMDC to us on 27.9.2004.

7. On our part, within 13 days we removed all the deficiencies after spending crores of rupees, and communicated the same fact in all its details to the PMDC on 11.10.2004.

8. Despite the expiry of about 6 months since then, the PMDC has still not carried out re-inspection for verification of removal of deficiencies.

9. The Council at its meeting held on 26.27.1.2005 finally cleared our case for verification of removal of deficiencies and processing the case for recognition. PMDC now told us that the Association of Private Medical and Dental Institutions, (PAMI) had challenged their performance in Sindh High Court and they had been restrained to function with regard to recognition of the private medical institutions. The Ministry of Health wrote to them that, as the Court had not issued any restricting order except that relating to the election of the president PMDC, they should compete the inspection process without further loss of time. However, they have still to this date not sent us any inspection team. They, however, are continuing to perform similar functions in respect of public sector medical colleges, and strangely enough the stay order does not hinder this process. Incidentally, some litigation with our landlord had already been resolved amicably in the meantime.

As per desire of the PMDC (which incidentally is without legal cover), for the last two years, we have not made any admissions nor charged any fee even from the admitted students. On the other hand we have been incurring expenditure on salaries of faculty and staff alone at the rate of Rs. 6 crores annually, which has strained the finances of the College to

breaking point. This expenditure was incurred by us to remove the deficiencies pointed out by the PMDC.

The latest situation is that during its meeting held on the 26-27 January 2005 the PMDC the Council wrote as follows in its minutes:

“It was informed that they (UCMD) are following all PMDC regulations and had not made any admissions so far and had fulfilled all deficiencies pointed out in the last inspection. The Council decided that inspection process of UCM&D may be continued since dispute of title of property had been resolved by the college authorities”.

In spite of the above resolution the process of verification of removal of the deficiencies, which was a 2-day activity, could not be launched by the Council even after three months for reasons best known to them. The list of the faculty and the correspondence exchanged with the Council is attached.

The present position is that due to the fact that we have had no income for the last two years, and have been incurring an expenditure on the faculty at the rate of Rs. Six crores per annum, the College is in extremely dire financial straits. Unless admissions are made immediately, we may be forced to close the College down ourselves, despite having the best faculty of about 170 senior most professors and staff, and despite having removed all deficiencies. The careers of hundreds of students would be wrecked. Being afraid of this eventuality, the students and their parents have been reduced to nervous wrecks during the past four years.

**STATEMENT SUBMITTED BY PROF. M. AFZAL KHAN NIAZI,  
PRINCIPAL, ISLAMABAD MEDICAL AND DENTAL COLLEGE**

The representative of Islamabad Medical and Dental College, informed the Committee about the problems of 34 students registered with Baqai Medical University, Karachi, waiting for examination for last 02 years.

The problems raised by him are as under:

1. Students who passed through Baqai Medical University Karachi possess only detailed marks certificates. No degree was issued to them due to the registration problem with PMDC.
2. Final year students awaiting supplementary examination in one or more subjects.
3. Final Year students waiting to appear in annual examination for last two years.
4. Fourth year students awaiting 31 professional examinations (annual & supplementary) for last two years.
5. Students of 2nd professional (annual & supplementary) in waiting for last two years.

He also informed the Committee about the problem of un-registered students as under:

1. Students inducted in 2002 spend 3 years in this college passed local part 1 first Professional examination on 6th January 2003, waiting for composite examination. (1st & 2nd Part).
2. Student inducted in 2003 and has completed 2 years of training and waiting for examination of professional part 1.
3. Student inducted in 2004 have completed one year of training and waiting for part 1 promotion examination.
4. Inspection report and identification of deficiencies communicated to the college thereafter rectification done and already has been submitted to the PMDC, IMDC/P/2 to 9 dated 14 Oct, 2004.
5. Non recognition of IMDC since 7 years.
6. Social Security Hospital letter (contract) of ten years of affiliation is present.
7. Ownership (agreement papers already submitted to the PMDC, any other paper required will be provided).

**STATEMENT OF LT. GEN ® PROFESSOR DR. SYED AZHAR AHMED, VICE**

### **CHANCELLOR, BAQAI MEDICAL, UNIVERSITY, KARACHI.**

1. Islamabad Medical & Dental College (IM&DC) was established sometimes in 1996. The college was neither affiliated to any University nor recognized by the Pakistan Medical and Dental Council (PMDC) at that time.
2. The IMD&C authorities tried to get their college affiliated to other universities of the country but they could not succeed in getting their college affiliated with any university.
3. In 1999 the college management approached the Baqai Medical University at Karachi for affiliation, which was refused.
4. Due to dire situation of students unrest and apprehension of law and order situation the management of IM&DC approached us again and again with their promise that they will improve the teaching facilities of their college according to the PMDC Regulations.
5. In view of the students' welfare on humanitarian grounds and on and their undertaking to improve the teaching facilities in their college, the Baqai Medical University granted Temporary Affiliation for One Year to the IM&DC with the condition that the college would fulfill the requirements of the PMDC with recognition.
6. The PMDC inspected the Islamabad Medical and Dental College during 1999 –2000 but did not find the college up to the standard and therefore, did not accord recognition.
7. In the light of the decision of the PMDC the affiliation of the PMDC with the Baqai Medical University was cancelled.
8. Instead of improving the standard of education and getting their college recognized by the PMDC, the college management took the case to Lahore High Court, Rawalpindi Bench pleading for conducting the examination by the Baqai Medical University.
9. The court ordered to conduct the examinations of the students of the IM&DC on humanitarian ground. Orders of the learned court were complied by the University.
10. The IMDC, instead of making efforts for improvement in the standard of education in their college in accordance with the PMDC rules and regulations, has always resorted to seeking court orders for conducting the examinations by the Baqai Medical University at every stage.
11. The Final Year examination of the students of the IM&DC was conducted on the assurance of the Management of the IM &DC that the examination will be inspected by the Inspectors of the PM&DC.
12. The students filed Writ petitions in the Lahore High Court, Rawalpindi Bench for declaration of results and issuance of marks sheets. The court again ordered in favor of students.
13. The orders were complied and results were declared and Marks sheets were issued.

### **STATEMENT SUBMITTED BY MR M.A. RAUF,**

### **CHARIMAN, BODG AND BRIG. ® AJAIB, DIRECTOR GENERAL.**

**Mr. M. A. Rauf, Chairman, BOG, and Brig. ® Ajaib, Director General, University of Lahore, briefed the Committee and said that UCMD of the University of Lahore was established after seeking clearance from the Government of the Punjab as well as the Higher Education Commission and the PMDC. When the University got charter in the year 2002, as per the commitment of the PMDC, the University requested the Council to visit them. The Council took two years before visiting the college to carry out the initial inspection in June 2004. The deficiencies pointed out by the inspection team of the Council were removed by the University within two weeks and the PMDC was requested to complete the process of inspection. The Council, being totally insensitive to the fate of hundreds of students, has not yet completed the process of inspection.**

The Committee was further informed by them that the basic powers of the recognition of

institutions vests in the Central Government and not the PMDC under clause 11 of the PMDC Ordinance 1962 as amended in 1973 and it being only consulting body, does not have the power to seek

applications for the recognition as well as recognize medical qualifications.

The committee was further informed by amplifying the legal position that the basic power to recognize a medical or dental qualification and to have it included in schedule-I, according to the law, lies with the Central Government and the PMDC, being only a consulting body, does not have the power to seek applications for the recognition as well as recognize medical qualifications. He said that whatever PMDC has done so far by way of according recognition to various medical colleges both in the public and private sectors, without the consent and approval of the Central Government, and without having it included in the first Schedule, is liable to be unlawful and has no legal authority. All those medical colleges which may number in dozens, who have been declared as recognized institutions by the PMDC without having them first included in the First Schedule by the Ministry of Health, are practically unrecognized and the thousands of students of those institutions are likely to suffer due to unlawful actions of the PMDC. He also challenged the powers of the PMDC to suo moto withdraw recognition granted to any medical qualification by making the following submissions while referring to clause 22 of the Ordinance.

**STATEMENT OF DR SHEHYAR KHAN,**  
**REPRESENTATIVE OF PAKISTAN MEDICAL ASSOCIATION**

He informed the Committee that certain proposals are being made with aim that the PMDC should be democratic and transparent body, powerful to enforce its decisions thus ultimately improving the standard of medical education and protecting ethical rights of the patients. This will certainly improve the overall health status of nation. Another objective should be to include all the stakeholders in the council.

PMA has a strong reservation upon the composition of council. PMA is of the opinion that the PMDC should be powerful, transparent. And as far as possible democratically elected. This will help to achieve the aims of the Council, and would stop factors which may jeopardize its independent working. It is to mention here that there are too many members in the council at present.

They suggested that there should be 32 members of the council (the breakup is given below). There is no innovation in increasing the number of Council members as it does not improve the working. An illustrative example is that of the General Medical Council, UK. In July 2003, they reduced the numbers of members from 104 to 35, with an aim to make the council not only workable but also transparent by including the lay persons.

Their suggestions regarding the composition of council are as follows: 2 nominated members – one each from the National Assembly and the Senate to be nominated by Government (proposed increase of member of Senate is acceptable as it is representative legislative body).

2. 4 nominated members – one each from all provinces (this should be the provincial Secretary Health/Additional Secretary as proposed by Ministry).

3. 1 judge of the Supreme Court nominated by the Chief Justice, “Supreme Court of Pakistan.

4. Surgeon General from Armed Forces (as armed forces are one of the major stakeholders in health sector).

5. The Director General, Health, Federal Government.

6. 4 elected members – 1 from each province to be elected amongst the faculty of public medical and dental colleges.

7. 4 elected members – 1 from each province to be elected amongst the faculty of private medical and dental colleges.
  8. 4 elected members – one from each province to be elected by the *registered* Medical Practitioners.
  9. 4 elected members – 1 from each province to be elected by registered Dental Practitioner.
  10. 1 member from the Pakistan Medical Association.
  11. 1 member from the College of Physicians and Surgeons of Pakistan.
  12. 1 elected member from the Universities having medical and dental faculties and awarding postgraduate medical degree.
  13. 4 members – 1 one from each province among the Journalists of province nominated by the Union of Journalists (representing community).
1. Right to contest for the election and voting should be conferred upon the medical/dental colleges with at least 10 years of standing with 100 students in medical 50 students in dental sections.
  2. The academic councils should vote through secret ballot for above election.

### **Executive Committee**

PMA think that there is no need of any such supervising body. However if it is a necessity to run day to day affairs, its composition and procedure of election should be as follows.

1. Committee should be of 7 members.
2. President and Vice President of the Council will be ex. Officio members
3. Members of each province will elect one member among themselves.
4. One member should be elected by the whole council.

There is no justification to create permanent position of the Director General Health.

### **National Licensing Board**

National Licensing board should be formed under PMDC to award license for practicing medicine in Pakistan.

### **STATEMENT OF PAKISTAN ISLAMIC MEDICAL ASSOCIATION**

The Committee was informed by Pakistan Islamic Medical Association that (PIMA) that any change in the status of PMDC will not only give way to bureaucratic and political interference in its affairs but may affect the future recognition of our graduate world over. Whole medical world is watching us keenly and closely. We are not against any healthy change or regulation but to undo its shortcomings the pendulum may not be swung all the way to the other side. This will be a disaster. They propose that autonomous and democratic status of PMDC must not be disturbed. A watchdog body of high academics can be placed to see the smooth running of PMDC and whether all its rules are applied fairly and uniformly.

### **STATEMENT OF PROF. JAN MUHAMMAD MEMON, VICE CHANCLER LIAQUAT MEDICAL UNIVERSITY, SINDH.**

He informed the Committee that Pakistan Medical & Dental Council is premier Organization to regulate Medical Profession in the Country, after having rather poor performances in the recent past has really done extremely well since last 3 years or so, where quite a lot of ground had been covered to restore its credibility and image much to the satisfaction of the medical professionals in regulating and streamlining the Medical Education and Medical Practices Country wide although it is long way to go, however, if timely steps are taken the much expected duties could be discharged by the Council as is being envisaged now by almost every medical practitioner in the Country.

The recently held ASIA HEALTH Conference in Karachi and the 50 years Symposium of Liaquat National Hospital invariably where all the participants were looking for

guidance from the Pakistan Medical & Dental Council on issues related with profession. In my capacity as member General Council for more than seven years and elected members of Executive Committee and Vice-Chancellor of first ever Medical University of Country feel duty bound to submit the following proposals for better working of Pakistan Medical & Dental Council.

### **PROVINCIAL HEADQUARTER OF PMDC**

As per decision of Executive Committee it incumbent up on council to establish the Provincial Regulatory Centers as the work load now need to be redistributed and managed by-Provincial Headquarter offices and register every practitioner, followed by addressing the several other related issues confronted by profession.

### **2. A FULL TIME PRESIDENT, VICE PRESIDENT AND SECRETARY.**

These key Executives needs to be in head-quarter office as the business of council has multiplied several times and the multifarious nature of related problems require these officials to attend the offices regularly for prompt quick decisions and early disposal on daily basis, of course the residence, transport and necessary remuneration can be fixed as per clause F of (9) PMDC Ordinance 1962. This really is essential and it would tremendously improve the working of the Council as is being desired by the profession across the Country.

### **3. BEST TEACHER AWARD.**

To honour and encourage the hard working professional teachers, imparting Medical Education in Country, a Best Teacher Award may be started with a token amount and certificate of recognition every year. These extra incentives shall bring about the best from Medical teachers to improve the quality and standard of Medical Education in Country. Similar practice is also being followed at Higher Education Commission as well.

### **4. SCHOLARSHIPS FOR UNDERGRADUATE AND POSTGRADUATE.**

As premier organization for Medical profession an award of scholarship for undergraduate and postgraduate students strictly as per merit shall go long way in promotion of Medical Education and help the non affording but meritorious students to pursue the studies and serve the Country to the best of their ability.

### **CURRICULUM DEVELOPMENT**

Besides updating the existing curriculum there is dire need of including LT and Medical Ethics as component of undergraduate curriculum. The PMDC Curriculum Committee should seek the views of academicians and pass on necessary instructions in this regard.

### **6. PROMOTION OF RESEARCH IN MEDICINE.**

Original Research articles accepted in International Conference by Medical teachers may be sponsored and the travel and logistic expenditure be borne by Pakistan Medical & Dental Council. Also original research projects after peer review should have financial support up to 0.2 million.

### **7. PUBLIC AWARENESS INFORMATION**

Distribution of Nationwide Health information about the diseases out breaking its catastrophic effects, like: Bird flu, SARS, Leishmaniasis in part of southern Punjab, Sindh and Balochistan. Necessary measures for prevention and early scientific treatment to save the patient from serious ill effects are some of the examples.

### **PROPOSAL FOR FUTURE WORKING IN HEADQUARTER OFFICES.**

- a) Presentation of Annual Budget in form of recurrent and development component duly approved by executive committee with estimated incomes generation and expenditure.
- b) Detailed Annual Report to be submitted to council for distribution and approval.
- c) A constant collaboration with parallel organization like, Ministry of Health, Education, HEC and provincial Government's and other professional Bodies like Nursing etc.
- d) Collection of information from the Provincial Headquarters, its analysis and implications.

**STATEMENT OF DR. SOHAIL KARIM HASHMI.**

**SECRETARY, PM&DC**

“The Secretary, PM&DC briefed the Committee that PMDC is a statutory apex body established under PMDC Ordinance 1962, which was amended through an act of Parliament in 1973. The principal functions of the Council are:

1. To establish uniform standards of education in medicine and Dentistry.
2. To maintain a register of medical and dental practitioners.
3. To conduct inspection of all the teaching institutions to ensure a satisfactory infrastructure, training facilities and qualified teaching faculty.
4. To ensure discipline and ethical practices amongst all the registered practitioners.

The Council has fifty two members. These members are elected from recognized University Syndicates, Medical Institutions and registered practitioners both from disciplines of medicine and dentistry. It also includes nominated members from Parliament, Supreme Court, Federal Government and provincial Governments. The council elects its President, Vice President and Executive Committee from amongst the members of the Council. They all work on honorary basis.

The medical qualifications of Pakistan are recognized throughout USA, Great Britain, Middle East and other English speaking countries because of the strict criteria of this Council. Pakistan is the only Muslim country of the world whose accreditation standards have been declared comparable to the standards of medical education in Great Education Department of USA and was communicated to PMDC by Secretary Education USA in May 2003. In the recent past Government of china, Nepal, Bangladesh and UAE approached Pakistan Government for Collaboration and accreditation of their medical schools by the PMDC.

Mushroom growth of private medical colleges sprung up in the past 15-20 years. These private medical institutions with the exception of Aga Khan Medical University are located in small premises without any decent infrastructure and almost no qualified faculty in certain disciplines. Any medical institution providing training in medical disciplines needs a well established general hospital. According to PMDC regulations training institutions in medical discipline require 5 beds for every student admitted per year. None of these provisionally recognized private medical colleges has such proper general hospital of their own. They have given admission to the students over and above their allocated seats, had allowed migration of students from unrecognized institutions in violation of PMDC admission criteria and regulations. The only way to make enormous amounts of profit by private medical colleges is to by pass the regulations of the Council, which are binding to all institutions according to the Law and Supreme Court Judgments but unfortunately PMDC has no power to take action against these institutions.

Since the only obstruction to make enormous profit by vested interest happens to be the PMDC. The Council has been targeted by a joint Private Medical Colleges Association in order to remove this hurdle. Their ultimate aim is to take over the total control of the Council and completely denigrate its functions. Private institutions challenged the powers

of the Council for inspection of their institutions, allocating them number of seats per year and recognition of their institutions in different honourable High courts. Fortunately the Honourable courts have given clear decisions on the issue of inspection of the institutions, allocation of seats and recognition of the institutions. The power regarding the provisional recognition of the institutions are challenged and are subjudice in the different Honourable High Courts and supreme Court of Pakistan.

After repeated dismissal of their Writ Petitions in Honourable Courts now they have focused their efforts on the Ministry of Health. It is a great misfortune for the profession and the nation that the Association of private medical colleges has now been able to secure the support of the Ministry of Health particularly after the sad demise of Prof. M. Hayat Zafar who died on 27<sup>th</sup> December 2004. In order to accommodate the demands, of private medical colleges association, Ministry of Health ordered the PMDC to convene a meeting with the Association. On 15<sup>th</sup> January 2005 a meeting was convened in which the Association instead of giving any suggestion for improvement of medical education demanded that all the provisionally recognized private medical colleges (except for Aga Khan University which is fully recognized and represented in the Council) should be given the rights of the membership in the Council even if they were not fulfilling the criteria of the Council for recognition. The Association also demanded that PMDC should postpone the elections of the President scheduled on 26<sup>th</sup> January 2005 on the expiry of the term of the previous President till such time that all private medical colleges are given an entry into the Council. Again on 19<sup>th</sup> January 2005, Ministry of Health came to the support of the Association by writing to PMDC to postpone the election of the President, which was scheduled on 26<sup>th</sup> January 2005. This letter of the Ministry of Health seriously damaged the status and autonomous character of the Council. On 25<sup>th</sup> January 2005 this letter was produced before the Honourable Sindh High Court and the Association was successful in obtaining Stay Orders against holding of the elections on the strength of this letter.

To increase pressure on the Council, the Provincial government of Sindh withdrew the membership of Secretary Health (Sindh) and instead nominated R. Asim Hussain, owner of Ziauddin University and Hospital and President of Private Medical College Association. This was done to

design the entry of president of private medical by the sindh Government was **managed** only a day before the Council was going to hold elections for the President. Moreover Ministry of health notified this nomination without any letter addressed to them in the middle of the night.

The Ministry of health also issued a notification on 19<sup>th</sup> January 2005 for my repatriation while I was appointed in the Council since December 2000 on regular basis through a proper process after proper relieving by the Ministry. This was done to put further pressure on the Council through an unlawful act to destabilize the Council after the death of President PM&DC.

To put further pressure on the Council to facilitate unrecognized medical institutions, Ministry of Health, influenced the Senate of Pakistan in collaboration with administration of Islamabad Medial & Dental College and managed protest of few poor girls who had spend millions of Rupees in acquiring their degrees to misguide the honourable Senators. The Senate was provided wrong information about the problem of registration of Islamabad Medical College, graduates of Baqai Medical University, Karachi & about my attitude. The chief whip of the ruling party on the behest of Ministry of Heath played a vital role to damage the image of prestigious Council and a resolution was passed for my suspension as Secretary PM&DC and registration of improper trained students on wrong statement.

Ministry and influential politicians are patronizing this illegally established medical college providing them full support a all forums. Minister for Health and Secretary Health visited unrecognized institution in clear violation of Cabinet Division instructions. Minister for Health personally called the late President many time for recognition of this college to accommodate the

influential personalities.

Looking at the weakness in the PM&DC Ordinance to take action against institutions, which are failing to observe laid down standards, Council proposed certain amendments to Ministry of Health and submitted to Ministry of Health after hard work of three years in June-2004. Ministry of Health is not forwarding the proposed draft of PM&DC Act for enactment and wants to make amendments of their own choice to cripple the autonomy of the Council by incorporating more control of the Federal Government. Therefore it is pending with the Ministry since June 2004.

PM&DC has been successful in sustaining pressure of Ministry of Health, politicians, bureaucrats and other influential elements. In the last five years the Council has revised the Code of Ethics, curriculum of MBBS/BDS, developed website of PM&DC, obtained membership of International Association for Medical Regulatory Authorities (IAMRA), Closed many illegal medical dental colleges, Had been invited for Journals, framed *PM&DC* Administrative and Financial Regulations, revised PM&DC Ordinance-1962 for enactment, started expansion of PM&DC Secretariat Building, established a Bank Booth in the PM&DC Secretariat premises and is conducting a transparent National Registration Examination for Foreign Medical and Dental Graduates and equivalence examination for foreign postgraduate qualifications.

Being an employee of the Council I am bound to carry out the decision of the Council and have no role in the policy issues. When the Ministry of Health asked for my repatriation Council categorically informed the Ministry that I am a regular employee of the Council recruited through a proper process working on substantive basis. Member Legal of the Council who is the nominee of the Chief Justice of Pakistan informed the Council that the notification of repatriation by Ministry of Health is illegal and unlawful. 'The allegations leveled against me by the Ministry of Health are that I do not follow their instructions and instigate students against the Ministry and private medical colleges. These allegations need to be corrected as I have to follow the instructions of the Council and not of the Ministry of Health and the Council in its recent Session has by deceiving innocent students and parents and when I inform the students and parents that these colleges have been established unlawfully and had admitted students in violation of PM&DC regulations so their chance for registration with Council is remote they get instigated on the attitude of private colleges and on Ministry of Health for not following the summary which they submitted to Prime Minister for closure of this illegal college. The Council generates its own funding. It does not receive any grant from the government of Pakistan. In 1999-2000 the annual budget for the Council was 11.3 million and in 2004-2005 is 41.65 million. Total savings in 1999-2000 was 20 million and now up to December 2004 are 140 million. The chartered accountant firms do the annual audit regularly and audit reports are provided to the Director General Health of the Federal Government accordingly. The previous Secretary PM&DC is under trail with NAB for embezzlements of 68 million and now he is writing letter in the Press and has become the chief advisor for the private medical institutions. He is on bail because of a medical certificate issued by the Ziaduddin Hospital Karachi being the patient of cancer without any proof.

I am grateful to the Pakistan Medical Association and Pakistan Islamic Medical Association who have taken strong notice of interference of the Ministry of Health in the PM&DC affairs and have written to the President and Prime Minister about their concerns will be for this issue came to the

Senate and the Press. Because they were fully aware of the move of the Ministry of the Health and private colleges for grabbing the post of a President PM&DC on expiry of the term the President Prot M..Hayat Zafar and anticipated the interference of the Ministry.

In order to restore the autonomy and proper *functioning* of PM&DC, it is requested that: a) The draft amendments submitted to the Ministry of Health by the PM&DC should be enacted as proposed by the Council for proper regulatory functions of the Council.

b) Ministry of Health should be advised to refrain from any further interference in the functions of the Pakistan Medical and Dental Council.

c) PM&DC being regulatory body for medical education may be placed under the control of Cabinet Division.

### **A BRIEF STATEMENT OF D.G. HEALTH**

The Director General, Health told the Committee that Private Medical and Dental Colleges of Pakistan established the Association of Private Medical & Dental Institutions (PAMI) in 1999 to safeguard the interests of the Private institutions. Through this forum they have been agitating for representation in the Pakistan Medical & Dental Council. PAMI represents approximately 50% of the total number of medical and dental institutions in the country (the number of private and public sector medical and dental institutions are almost equal).

He told that the Ministry of Health has no objection to the grant of the requested representation to the recognized private medical & dental institutions. The PM&DC Ordinance, 1962 does not spell out the private or public character of the medical teaching institutions to be represented on the Council. The Ordinance in this regard does not indicate membership for full time or provisionally recognized medical teaching institutions as it only says that medical institutions “for the time being recognized” will be eligible for membership of the Council. He further told that on a representation by the private medical & dental teaching institutions, the Ministry of Health agreed in principle, to allow them membership of the PM&DC. The Ministry of Health has, however, sought the opinion of the Ministry of Law before issuing the required notification.

30. During the visit to Baqai Medical University, Karachi Lt. Gen. © Dr. Syed Azhar Ahmad, Vice Chancellor briefed the Committee and said that we are very thankful for the Committee for taking keen interest in the medical education of Pakistan. Particularly, viz-a-viz private sector in the country. He further told the Committee that we have been running the medical institution for the last 17 years without any outsider support. It is our privilege that the Committee is visiting our university and hope that it will solve the problem of medical profession much better.

### **STATEMENT/APEAL OF THE STUDENTS**

“The Sub-Committee also heard the views of the students of different college universities regarding their non-registration as Doctor by PMDC. They informed the Committee that they have graduates in MBBS from Baqai Medical University (BMU), as the students of Islamabad Medical and dental College (non-migrated to BMU). We have got the same degrees as other students from Baqai Medical University. We have completed pre graduation clinical expertise as other doctors. We are eligible to apply for post graduation in the world like UK and USA except in Pakistan. We have qualified for the interviews for House jobs.

The main hurdle in pursuing our career is registration as doctors by PMDC, the main reason that we got our education from IMDC. But it is fact that all our professional examination were taken by Baqai Medical University. We appeared in final professional examination in Jan 2003. Since that time we are treated as rolling stone and PMDC is constantly refusing to register our MBBS degrees.

They are the most oppressed and helpless students of IMDC that. even. after lapsing of 2 years and getting our degrees from same university (BMU) they did not get registration from PMDC

Our parents have spent almost 1500000 each and we spend 8 precious years of our life in our MBBS education but still our future is looking bleak. They have gone through every level from PMDC to Ministry of Health but no hope and no sympathy has shown yet. It is not the matter of just few students infect it's the matter of many families and majority of them are overseas Pakistani's, who send their children in their own home own home land but our future is ruined here.”

#### **STATEMENT OF AJ KHAN, REPRESENTATIVE OF FRONTIER MEDICAL COLLEGE**

The inspection reports of medical colleges, as submitted to PMDC and presented to the PMDC Council show a deplorable position of education and of faculty in the colleges. All the inspected government medical colleges are extremely short of faculty. PMDC has laid down specification for the requirement of faculty in each department of the college mainly based on number of admissions. It will be noticed from the reports that some of these colleges have hardly 12% of faculty and in some departments there is hardly any teaching staff. With this kind of faculty, these colleges should have been directed to close down, or many have been given a warning to improve their shortages and given Provisional Recognition, instead all these colleges have been given full recognition. This means that officially they may not be inspected for the next five years, but in actual fact they may not be inspected even for 20 years or even not inspected at all as is being practiced by PMDC now-a-days.

With this nominal number faculty of about 12% how can these medical colleges impart medical education and maintain the standard and produce a doctor of international standard.

From these reports it is very clear that PMDC has not fulfilled its duty to see and maintain the standard of medical education in these colleges and also in other medical colleges in the country. When PMDC found that their teaching facilities were very poor with resultant necessary action, advising them, warning them and threatening to close, so that these colleges improve their facilities, but unfortunately PMDC has done nothing. it has been busy making money from private medical colleges.

The position of faculty of other medical colleges in the country which have not been inspected is still worse, most of these colleges have not been inspected. Some have never been inspected perhaps due to the fear that these colleges and PMDC will get exposed. Rawalpindi Medical College just under the nose of PMDC and Ministry of Health has not been inspected, it is said that this college has only one professor as against the requirement of 30 Professors in all its basic departments. This seriously needs verification.

PMDC should explain why they have permitted this kind of situations to develop and continue and they have let *the* standard of teaching go down so low,

The Ministry of Health has to seriously consider what is happening in the country under their very eyes. It is the responsibility of the Ministry of Health. Has the Ministry of Health even bothered to see and check if PMDC is working satisfactorily and if not why? Should the PMDC still be permitted to continue?

#### **STATEMENT OF SECRETARY MINISTRY OF HEALTH**

Subject:- **ISLAMABAD MEDICAL AND DENTAL COLLEGE .AN UNRECOGNIZED PRIVATE INSTITUTION**

The Prime Minister has been pleased to direct that the matter concerning the Islamabad Medical and Dental College should be speedily resolved. The issue also involves the future of students admitted in this unrecognized private medical college.

The current legal position is that medical education is regulated by a statutory body with an inter-provincial composition, largely elected by syndicates, registered doctors/dentists and university faculty members. One member from legal profession is nominated by the Chief Justice of Pakistan. Ministry of Health is represented by Director General Health ex-officio. The President of the Council is elected. The current President is Professor Hayat Zafar. The law envisaged an independent body capable for ensuring high standards of medical education.

Section 11 of the Medical and Dental Ordinance envisages recognition of medical qualifications by the Federal Government after consulting Pakistan Medical and Dental Council (PMDC).

Under Section 21, the Council's Inspectors have the powers to inspect examinations held by medical/dental institutions for the purposes of granting such recognized qualifications. PMDC enjoys full powers of registration of practitioners possessing such recognized qualifications vide Section 23 of the Ordinance. Section 32 (2) empowers the PMDC, inter-alia, to make Regulations for:

- a) prescribing a uniform minimum standard of course of training for obtaining graduate and postgraduate medical and dental qualifications;
- b) registration of medical or dental students at any medical or dental college or school of any university.

Thanks to a strict regulations regime, Pakistan's MBBS and fellowships are recognized by key countries Like UK and USA under mutual arrangements. This has been possible on the basis of long functioning widely-recognized medical college of this country, largely in the public sector. For example, the last such registration arrangements with USA's National Committee on Foreign Medical Education and Accreditation (NCFMEA) was finalized in May, 2003. On except of letter dated 23rd May 2003 from NCFMEA is quoted below:"I

am please to inform you that the NCFMEA based on the most recent information and materials received from Pakistan reaffirmed its prior determination that the standards and processes used by PMDC to accredit medical schools in Pakistan are comparable to those used to accredit medical schools in the United States... as a result of the determination, any medical school in Pakistan that is accredited by PMDC may apply to the US department of Education to the Federal Family Education Loan (FFEL) Programme."

The misbehaviour of some private medical colleges in Pakistan has recently attracted attention of international medical bodies. Ministry of Health has received queries from abroad causing concern. If the standards of regulation of medical education fall prey to exigency or compromise, enormous damage to national interest can result from de-recognition of our MBBS/Fellowship by peer bodies abroad. Hence the need for ensuring that no half-backed medical institution, with half baked non-merited students, are allowed to jeopardize the degrees of those who got admissions in proper medical colleges on ti

The idea of encouraging private sector part was to ensure substantial investment by ei library and laboratory and teaching hosp Instead, influential and quick-profits .ill vocation into deceiving students wh sect to giition.

low merit in recognized colleges

inspections, these colleges are unal

repeated press warnings not to seek admissions in un-recognized colleges the students get

themselves admitted there, even paying exorbitant fees.

Islamabad Medical and Dental College is a case in point. It was established in 1996 with a fraudulent press advertisement announcing that it was registered with PMDC and attached with Federal Government Services Hospital, Islamabad. Ministry of Health is on record for having informed the public through a press note that both claims were fallacious. Since then many inspections have been done by PMDC. To this day, this College neither has a hospital nor meets the basic criteria for imparting medical education. Products of such institutions can be described as doctors at a peril to the profession itself. It is therefore inconceivable for PMDC to recognize such an institution. The number of students in the unrecognized Islamabad Medical and Dental College are 197. Again there are reportedly seven unrecognized Medical Colleges in the Country who continue to admit students. The recognized Medical and Dental Colleges are 48 in number.

The present law neither authorize the Federal Government/PMDC to disallow admission of students without obtaining proper permission, nor does it empower the Federal Government/PMDC to order the closure of such Institutions at any stage. The present statute envisages that Federal Government/PMDC will only accord recognition where proper standards are met. The Ordinance presupposes that people will not join such unrecognized institutions, and that such colleges will voluntarily close down when they are unable to gain recognition. No offence is made out under existing law for such colleges to keep operating and applying for inspections of PMDC without some cut-off point. The loopholes in law need to be rectified so that potential exploitation of students can come to an end.

Ministry of Health took corrective measures in May, 1999 by proposing an amending Ordinance to the *following* effect:

“22-A. Recognition of medical and dentistry teaching institutions. –(1) No person shall run or establish any college or institution for imparting education in medicine dentistry, and neither shall any university grant affiliation to any such college or institution nor any such college or institution shall award any certificate unless recognition has been granted to such college or institution under this Ordinance.

2. Any person desirous to run or establish a college or institution for imparting education in medicine or dentistry shall apply for recognition under this Ordinance and no college or institution shall be recognized unless it fulfils the condition prescribed by the regulations.

3. An application under sub-section (2) shall be addressed to the Council and shall be accompanied by the fee and shall contain such information as may be prescribed by the regulations.

4. The Council may, considering the application for recognition call for such further information as it may consider necessary and also direct a local inquiry to be made by any person authorized by it in that behalf.

5. After considering the information furnished with the application and the report of local inquiry, if any, and after making such further inquiry as may, from time to time, appear to it to be necessary the Council shall forward the application to the Federal Government along with its recommendations which may, by order grant or refuse to grant recognition or grant the recognition subject to such terms and conditions, if any, it may be specified in the order.

22B. Withdrawal of recognition.- (1) Subject to sub-section (2) if Federal Government, on the basis of any report made by the Council or such other information as may have reached it, is satisfied that a college or institution which has been recognized does not fulfill the prescribed

conditions or has ceased to fulfill any such condition or has not fulfilled the condition subject to which recognition was granted, it may withdraw the recognition.

(2) No order under sub-section (1) shall be made unless the person *running* the college or institution has been provided an opportunity of being heard.

22C. –(1) Whoever runs or established any college or institution for imparting education in medicine or dentistry which is not recognized under section 22A or in respect of which recognition has been withdrawn under section 22B, shall be guilty of an offence punishable with rigorous imprisonment for a term which may extend to five years and with fine which may be extend to fifty thousand rupees.

(2) Where the person guilty of an offence referred to in sub-section(1) is an association or organization every officer responsible for the conduct of its affairs shall, unless he proves that the offence was committed without his knowledge or that he exercised all diligence to prevent its commission, be deemed to be guilty of the offence.”

It is generally believed that the above amending Ordinance which was aimed at eradicating exploitation of students was allowed to lapse on account of the pressure of vested interests and influential quarters.

Ministry of Health seeks the approval of the Prime Minister to re-enact the provision of the amending Ordinance called the Medical and Dental Council (amendment) Ordinance, 1999 with any additional provision that where a Medical and Dental College operates without recognition, Federal Government will be empowered to order its closure after giving it due notice and providing opportunity of hearing to its owner/administration.

The Federal Ministry of Health will be in a position to restore discipline in the sector of medical education and end exploitation made possible on account of existing loopholes in the law.

Ministry of Health further proposes that in view of the urgency of the matter, it may be allowed to recommend to the Cabinet that the needed change may be promulgated as an Ordinance, and thereafter introduced in Parliament.

Once a delinquent college is formally and legally closed down as per above procedure.

The PMDC will be in a position to consider award of NOC to its students to be admitted by other private medical colleges on that ground. This will be subject to any test/interview or additional teaching that may be prescribed to ensure that these students reach basic standards.

Ministry of Health further proposes that a ban may be imposed on establishing new Private Medical College in Islamabad on account of potential disturbance to law and order of the capital city and also because there is already an excess production of doctors in the country. This ban should not be relaxed without the approval of the Federal Cabinet.

### **DETAILS OF VISITS**

1. The Sub-committee visited following departments of private medical colleges/universities at Lahore, Karachi, Abbottabad and Islamabad:

- i Histology Lab
- ii. Dissection Hall
- iii. Anatomy Museum
- iv. Physiology Lab
- v. Cardiology Lab
- vi. Biochemistry Lab
- vii. Microbiology Lab
- viii. Research Lab
- ix. Pathology Museum
- x. Pharmacology Lab
- xi. Medicine

xii. Forensic Medicine Lab

xiii. Library Department

xiv. Lecture Hall

xv. Auditorium

xvi. Demonstration Rooms

xvii. Administration Department

xviii. Various departments of Affiliated Hospitals of the Universities/Colleges visited.

2. The Sub-Committee visited University College of Medicine and Dentistry, Lahore. The briefing was presented by Dean, Faculty of Health Sciences. He informed the Committee that UCM&D submitted all the requisite documents to the PM&DC for grant of recognition under Section 11 of PMDC Ordinance 1962 as amended up to 1973 but until now registration /accreditation has not been granted to the UCM&D inspite of repeated request to the PM&DC. He further said that the University took two years +

receives the charter from the Government of Punjab on 02-10.2002. Soon after the grant of the Charter we supplied copy thereof to the Council as per requirements.

3. After a lapse of 18 months inspection was carried out and the deficiencies pointed out by have been removed and communicated the same fact in all its details to the PM&DC on 11.10.2004. The delay has been made by the PMDC for procedural check up and consequently the students are experiencing great hardships due to non issuance of registration /accreditation by them. In brief the Committee was informed that all the deficiencies have been removed since long but no action has been taken by the PMDC until now. In this connection the Committee was told that PMDC visited the University College of Medical and Dentistry, Lahore in June 2005 and confirmed the removal of deficiencies.

4. The Dean Faculty of Health Sciences requested that the Sub-Committee of the Senate Standing Committee on Health should look into the matter sympathetically for registration/accreditation of Private Medical Colleges/Universities by PMDC in order to solve the problems of students regarding their registration. He further said that we need the support of Sub-Committee for the purpose.

5. The Committee also visited Fatima Memorial Hospital, Lahore. The Committee was briefed by the Representative of Fatima Memorial Hospital on its working and performance. The Committee was told that Fatima Memorial Hospital (FMI-I) Lahore was established in 1977, under the aegis of the Ferozsons Trust, as Pakistan's first non-profit Muslim Trust Hospital. FMH has the unique distinction of being Pakistan's oldest and largest NGO in the health sector. Started as a 200 bed community hospital for women and children, it became a 410 bed multi disciplinary hospital for men, women and children in 2000. As a general hospital, FMH offers comprehensive facilities to cater to the health needs of men, women and children in all the major disciplines.

6. The Committee was further briefed that FMH is an institution that offers superior and expert care. It has the unique privilege of being able to offer the same quality of health care to patients from all walks of life. At Fatima Memorial Hospital, rich poor alike are guaranteed equal and professional treatment. FMH runs on the principle of cross-subsidization and revenues from private patients are utilized to provide free or highly subsidized treatment to the poor.

#### **VISITS OF THE SUB-COMMITTEE**

7. The Sub-Committee on Health visiter Abbottabad International Medical College, Abbottabad, Frontier Medical College and Hazara Medical College on

October 2005 to obtain suggestions/views regarding accreditation/registration of the private medical colleges/institutes by PMDC under the Chairmanship of Senator Dr. Abdullah Riar. Senators Razina Alam Khan, Dr. Kauser Firdaus and Dr. Nighat Agha were also accompanied.

8. Abbottabad International Medical College was visited by the Committee. Dr. Ghazanfarali, Vice Principal briefed the Committee and said that college is managed by Al-Ishaque Trust (Regd) which is affiliated with Mohi-ud-din University and recognized by Higher Education Regulatory Authority. Presently the college has three following fully equipped departments of basic sciences i.e. anatomy department, physiology department and bio-chemistry department. He further informed the Committee that the college has its own transport facility and hostel facility for both the genders. It has also teaching hospital allotted by the provincial government as public private partnership with 150 beds private hospital.

9. The Sub-Committee visited University College of Medicine and Dentistry, Lahore. The briefing was presented by Dean, Faculty of Health Sciences. He informed the Committee that UCM&D submitted all the requisite documents to the PM&DC for grant of recognition under Section 11 of PMDC Ordinance 1962 as amended up to 1973 but until now registration/accreditation has not been granted to the UCM&D inspite of repeated request to the PM&DC. He further said that the University took two years to receive the charter from the Government of Punjab on 02-10.2002. Soon after the grant of the Charter we supplied copy thereof to the Council as per requirements.

10. After a lapse of 18 months inspection was carried out and the deficiencies pointed out by have been removed and communicated the same fact in all its details to the PM&DC on 11.10.2004. The delay has been made by the PMDC for procedural check up and consequently the students are experiencing great hardships due to non issuance of registration /accreditation by them. In brief the Committee was informed that all the deficiencies have been removed since long but no action has been taken by the PMDC until now. In this connection the Committee was told that PMDC visited the University College of Medical and Dentistry, Lahore in June 005 and confirmed the removal of deficiencies.

11. The Dean Faculty of Health Sciences requested that the Sub-Committee of the Senate Standing Committee on Health should look into the matter sympathetically for registration/accreditation of Private Medical Colleges/Universities by PMDC in order to solve the problems of students regarding their registration. He further said that we need the support of Sub-Committee for the purpose.

12. The Chairman and members of the Sub-Committee on Health paid a surprise visit to Islamabad Medical and Dental College and Social Security Hospital at 9.30 a.m. on 3 June 2005. The Committee visited the following different departments: The Sub-Committee visited Baqai Medical University, Karachi. Lt. Gen.(R) Dr. Syed Azhar Ahmad welcomed the Chairman and members of the sub-committee. He briefed the Committee on the working and performance of BMU, Karachi. While briefing he thanked the Chairman and members of the sub-committee on Health for taking very deep interest in the medical education of Pakistan, particularly viz-a-viz private sector in the country. He further said that they in the private sector of medical education have been running the medical institutions for the last 17 years without any outsider support and we hope that they will solve the problems of the medical profession much better. The Committee was

informed that the students of IMDC who migrated to Baqai Medical University were admitted to study along with the regular students of Baqai Medical University. They accommodated them for training and education on humanitarian ground after very pathetic appeal from their parents. The Baqai Medical University made every effort to accommodate them in the national interest because they have no way to go.

13. The Committee was further informed that in the past a similar situation arose in the case of a defunct medical college (Vohra Medical College in Karachi) where 150 students were *left* without any shelter by that college. In view of this situation the then Governor of Sindh Province Mr. Kamal Azfar took keen interest and asked us to educate them. They took over the responsibility of 108 students of the Vohra Medical College and educated them. They are happy that all of them have become doctors and are either serving in Pakistan or have gone abroad for higher education.

14. He further suggested to resolve the issue of the students of IMDC and said that those students who have taken the examination as regular students of Baqai Medical College and the Examination have been held at various stages and inspected by the PMDC, may be granted Registration. Some of the students, who have taken Final Examination without proper supervision, may be allowed to sit for a Special Examination, which is conducted by PMDC. A Sub-Committee on Health was paid visit Rawalpindi Medical College and Army Medical College on 10<sup>th</sup> October 2005 at 10.00 a.m. and 12.00 noon and obtained comprehensive briefing regarding their functioning under the Chairmanship of Senator Dr. Abdullah Riar.

15. Professor Muhammad Mussadiq Khan, Principal Rawalpindi Medical College welcomed the Chairman and members of the Sub-committee and briefed them on its working and performance.

16. During our visit in different colleges/universities the Committee observed that some of them do not fulfill the criteria prescribed by them but the students are still studying in those colleges/institutes. The Committee wishes to obtain the views of Rawalpindi Medical College regarding registration of unrecognized private medical colleges/institutes by PMDC in order to solve the issue of accreditation / registration of private medical students.

