

31 JUL 1992

For Six Month Period Ending _____
(Insert date)

Name of Registrant

Registration No.

McNair Law Firm, P.A.

#4534

Business Address of Registrant

1301 Gervais Street, NCNB Tower
Columbia, S.C. 29211

I—REGISTRANT

1155 15th Street, N.W., Suite 400
Washington, D.C. 20005

1. Has there been a change in the information previously furnished in connection with the following:

(a) If an individual:

(1) Residence address	Yes ☐	No ☒
(2) Citizenship	Yes ☐	No ☒
(3) Occupation	Yes ☐	No ☒

(b) If an organization:

(1) Name	Yes ☐	No ☒
(2) Ownership or control	Yes ☐	No ☒
(3) Branch offices	Yes ☐	No ☒

2. Explain fully all changes, if any, indicated in item 1.

N/A

IF THE REGISTRANT IS AN INDIVIDUAL, OMIT RESPONSE TO ITEMS 3, 4, and 5.

3. Have any persons ceased acting as partners, officers, directors or similar officials of the registrant during the 6 month reporting period? Yes ☐ No ☒

If yes, furnish the following information:

Name N/A

Position

Date Connection
Ended

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INTELLIGENCE SECTION

4. Have any persons become partners, officers, directors or similar officials during this 6 month reporting period?
 Yes ☐ No ☒

If yes, furnish the following information:

<i>Name</i>	<i>Residence Address</i>	<i>Citizenship</i>	<i>Position</i>	<i>Date Assumed</i>
N/A				

5. Has any person named in Item 4 rendered services directly in furtherance of the interests of any foreign principal?
 Yes ☐ No ☒

If yes, identify each such person and describe his services.

N/A

6. Have any employees or individuals other than officials, who have filed a short form registration statement, terminated their employment or connection with the registrant during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish the following information:

<i>Name</i>	<i>Position or connection</i>	<i>Date terminated</i>
N/A		

7. During this 6 month reporting period, have any persons been hired as employees or in any other capacity by the registrant who rendered services to the registrant directly in furtherance of the interests of any foreign principal in other than a clerical or secretarial, or in a related or similar capacity? Yes ☐ No ☒

If yes, furnish the following information:

<i>Name</i>	<i>Residence Address</i>	<i>Position or connection</i>	<i>Date connection began</i>
N/A			

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II—FOREIGN PRINCIPAL

(PAGE 3)

8. Has your connection with any foreign principal ended during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish the following information:

Name of foreign principal

Date of Termination

N/A

-
9. Have you acquired any new foreign principal¹ during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish following information:

Name and address of foreign principal

Date acquired

N/A

-
10. In addition to those named in Items 8 and 9, if any, list the foreign principals¹ whom you continued to represent during the 6 month reporting period.

American University of the Carribean
P.O. Box 400
Montserrat, West Indies, British Crown Colony

III—ACTIVITIES

11. During this 6 month reporting period, have you engaged in any activities for or rendered any services to any foreign principal named in Items 8, 9, and 10 of this statement? Yes ☒ No ☐

If yes, identify each such foreign principal and describe in full detail your activities and services:

(See Attachment C)

¹The term "foreign principal" includes, in addition to those defined in section 1(b) of the Act, an individual or organization any of whose activities are directly or indirectly supervised, directed, controlled, financed, or subsidized in whole or in major part by a foreign government, foreign political party, foreign organization or foreign individual. (See Rule 100(a)(9)).

A registrant who represents more than one foreign principal is required to list in the statements he files under the Act only those foreign principals for whom he is not entitled to claim exemption under Section 3 of the Act. (See Rule 208.)

12. During this 6 month reporting period, have you on behalf of any foreign principal engaged in political activity² as defined below?
Yes ☐ No ☒

If yes, identify each such foreign principal and describe in full detail all such political activity, indicating, among other things, the relations, interests and policies sought to be influenced and the means employed to achieve this purpose. If the registrant arranged, sponsored or delivered speeches, lectures or radio and TV broadcasts, give details as to dates, places of delivery, names of speakers and subject matter.

N/A

13. In addition to the above described activities, if any, have you engaged in activity on your own behalf which benefits any or all of your foreign principals? Yes ☐ No ☒

If yes, describe fully.

N/A

²The term "political activities" means the dissemination of political propaganda and any other activity which the person engaging therein believes will, or which he intends to, prevail upon, indoctrinate, convert, induce, persuade, or in any other way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting, or changing the domestic or foreign policies of the United States or with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party.

IV—FINANCIAL INFORMATION

14. (a) RECEIPTS—MONIES

During this 6 month reporting period, have you received from any foreign principal named in Items 8, 9 and 10 of this statement, or from any other source, for or in the interests of any such foreign principal, any contributions, income or money either as compensation or otherwise? Yes ☒ No ☐

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies.³

<i>Date</i>	<i>From Whom</i>	<i>Purpose</i>	<i>Amount</i>
4/16/92	American University of the	Compensation	\$12,995.95
5/18/92	Carribean - Henry Tien	" "	\$ 4,134.04
6/19/92	" "	" "	\$11,073.32
7/20/92	" "	" "	\$14,914.62
			<u>\$43,117.93</u>
		Total	

(b) RECEIPTS—THINGS OF VALUE

During this 6 month reporting period, have you received any thing of value⁴ other than money from any foreign principal named in Items 8, 9 and 10 of this statement, or from any other source, for or in the interests of any such foreign principal? Yes ☐ No ☒

If yes, furnish the following information:

<i>Name of foreign principal</i>	<i>Date received</i>	<i>Description of thing of value</i>	<i>Purpose</i>
N/A			

³A registrant is required to file an Exhibit D if he collects or receives contributions, loans, money, or other things of value for a foreign principal, as part of a fund raising campaign. See Rule 201(e).

⁴Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

15. (a) **DISBURSEMENTS—MONIES**

During this 6 month reporting period, have you

(1) disbursed or expended monies in connection with activity on behalf of any foreign principal named in Items 8, 9 and 10 of this statement? Yes ☐ No ☒

(2) transmitted monies to any such foreign principal? Yes ☐ No ☒

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies, including monies transmitted, if any, to each foreign principal.

<i>Date</i>	<i>To Whom</i>	<i>Purpose</i>	<i>Amount</i>
N/A			

Total

15. (b) DISBURSEMENTS—THINGS OF VALUE

During this 6 month reporting period, have you disposed of anything of value⁵ other than money in furtherance of or in connection with activities on behalf of any foreign principal named in items 8, 9 and 10 of this statement?

Yes ☐ No ☒

If yes, furnish the following information:

<i>Date disposed</i>	<i>Name of person to whom given</i>	<i>On behalf of what foreign principal</i>	<i>Description of thing of value</i>	<i>Purpose</i>
N/A				

(c) DISBURSEMENTS—POLITICAL CONTRIBUTIONS

During this 6 month reporting period, have you from your own funds and on your own behalf either directly or through any other person, made any contributions of money or other things of value⁵ in connection with an election to any political office, or in connection with any primary election, convention, or caucus held to select candidates for political office?

Yes ☒ No ☐

If yes, furnish the following information:

<i>Date</i>	<i>Amount or thing of value</i>	<i>Name of political organization</i>	<i>Name of candidate</i>
May 7, 1992	John L. Napier - \$50.00	Brian Ginn for Congress	Brian Ginn
May 7, 1992	James T. McIntyre, Jr. - \$50.00		"

V—POLITICAL PROPAGANDA

(Section 1(j) of the Act defines "political propaganda" as including any oral, visual, graphic, written, pictorial, or other communication or expression by any person (1) which is reasonably adapted to, or which the person disseminating the same believes will, or which he intends to, prevail upon, indoctrinate, convert, induce, or in any other way influence a recipient or any section of the public within the United States with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party or with reference to the foreign policies of the United States or promote in the United States racial, religious, or social dissensions, or (2) which advocates, advises, instigates, or promotes any racial, social, political, or religious disorder, civil riot, or other conflict involving the use of force or violence in any other American republic or the overthrow of any government or political subdivision of any other American republic by any means involving the use of force or violence.)

16. During this 6 month reporting period, did you prepare, disseminate or cause to be disseminated any political propaganda as defined above? Yes ☐ No ☒

IF YES, RESPOND TO THE REMAINING ITEMS IN THIS SECTION V.

17. Identify each such foreign principal.

N/A

⁵Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

18. During this 6 month reporting period, has any foreign principal established a budget or allocated a specified sum of money to finance your activities in preparing or disseminating political propaganda? Yes ☐ No ☒

If yes, identify each such foreign principal, specify amount, and indicate for what period of time.

N/A

19. During this 6 month reporting period, did your activities in preparing, disseminating or causing the dissemination of political propaganda include the use of any of the following: N/A

- ☐ Radio or TV broadcasts ☐ Magazine or newspaper articles ☐ Motion picture films ☐ Letters or telegrams
☐ Advertising campaigns ☐ Press releases ☐ Pamphlets or other publications ☐ Lectures or speeches
☐ Other (specify) _____

20. During this 6 month reporting period, did you disseminate or cause to be disseminated political propaganda among any of the following groups: N/A

- ☐ Public Officials ☐ Newspapers ☐ Libraries
☐ Legislators ☐ Editors ☐ Educational institutions
☐ Government agencies ☐ Civic groups or associations ☐ Nationality groups
☐ Other (specify) _____

21. What language was used in this political propaganda: N/A

- ☐ English ☐ Other (specify) _____

22. Did you file with the Registration Section, U.S. Department of Justice, two copies of each item of political propaganda material disseminated or caused to be disseminated during this 6 month reporting period? N/A Yes ☐ No ☐

23. Did you label each item of such political propaganda material with the statement required by Section 4(b) of the Act? Yes ☐ No ☐ N/A

24. Did you file with the Registration Section, U.S. Department of Justice, a Dissemination Report for each item of such political propaganda material as required by Rule 401 under the Act? N/A Yes ☐ No ☐

VI—EXHIBITS AND ATTACHMENTS

25. EXHIBITS A AND B

- (a) Have you filed for each of the newly acquired foreign principals in Item 9 the following:

Exhibit A⁶ N/A Yes ☐ No ☒
 Exhibit B⁷ Yes ☐ No ☒

If no, please attach the required exhibit.

- (b) Have there been any changes in the Exhibits A and B previously filed for any foreign principal whom you represented during this six month period? N/A Yes ☐ No ☒

If yes, have you filed an amendment to these exhibits? N/A Yes ☐ No ☐

If no, please attach the required amendment.

⁶The Exhibit A, which is filed on Form CRM-157 (Formerly OBD-67) sets forth the information required to be disclosed concerning each foreign principal.

⁷The Exhibit B, which is filed on Form CRM-155 (Formerly OBD-65) sets forth the information concerning the agreement or understanding between the registrant and the foreign principal.

26. EXHIBIT C

If you have previously filed an Exhibit C⁸, state whether any changes therein have occurred during this 6 month reporting period. Yes ☐ No ☒

If yes, have you filed an amendment to the Exhibit C? N/A Yes ☐ No ☐

If no, please attach the required amendment.

27. SHORT FORM REGISTRATION STATEMENT

Have short form registration statements been filed by all of the persons named in Items 5 and 7 of the supplemental statement? Yes ☒ No ☐

If no, list names of persons who have not filed the required statement.

The undersigned swear(s) or affirm(s) that he has (they have) read the information set forth in this registration statement and the attached exhibits and that he is (they are) familiar with the contents thereof and that such contents are in their entirety true and accurate to the best of his (their) knowledge and belief, except that the undersigned make(s) no representation as to the truth or accuracy of the information contained in attached Short Form Registration Statement, if any, insofar as such information is not within his (their) personal knowledge.

(Type or print name under each signature)

(Both copies of this statement shall be signed and sworn to before a notary public or other person authorized to administer oaths by the agent, if the registrant is an individual, or by a majority of those partners, officers, directors or persons performing similar functions who are in the United States, if the registrant is an organization.)

James T. McIntyre, Jr.
James T. McIntyre, Jr.
John L. Napier
John L. Napier
Steve M. Kupka
Steve M. Kupka

Subscribed and sworn to before me at District of Columbia

this 28th day of August, 19 92

Margie Ann Carroll
(Signature of notary or other officer)
5-14-97

⁸The Exhibit C, for which no printed form is provided, consists of a true copy of the charter, articles of incorporation, association, constitution, and bylaws of a registrant that is an organization. (A waiver of the requirement to file an Exhibit C may be obtained for good cause upon written application to the Assistant Attorney General, Criminal Division, Internal Security Section, U.S. Department of Justice, Washington, D.C. 20530.)

UNITED STATES DEPARTMENT OF JUSTICE
REGISTRATION UNIT
CRIMINAL DIVISION
WASHINGTON, D.C. 20530

NOTICE

Please answer the following questions and return this sheet in triplicate with your supplemental statement:

1. Is your answer to Item 16 of Section V (Political Propaganda - page 7 of Form CRM-154, formerly Form ORD-64 - Supplemental Statement):

Yes _____ or No X

(If your answer to question 1 is "yes" do not answer question 2 of this form.)

2. Do you disseminate any material in connection with your registration:

Yes _____ or No X

(If your answer to question 2 is "yes" please forward for our review copies of all such material including: films, film catalogs, posters, brochures, press releases, etc. which you have disseminated during the past six months.)

James T. McIntyre, Jr.
Signature

James T. McIntyre, Jr.

Please type or print name of signatory on the line above

Shareholder
Managing Partner
Title

Aug. 28, 1992
Date

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U.S. DEPT. OF JUSTICE

Signature Don J. Napier Date 8/28/92
John L. Napier Partner
Print Name Title

Sm. Kupka 8/28/92
Signature Date

Steve M. Kupka Associate Attorney
Print Name Title

ATTACHMENT C

11. The American University of the Caribbean-- The McNair Law Firm has counselled and advised our client of legislative bills (H.R. 3553 & S. 1150) relating to the Reauthorization of the Higher Education Act (HEA) and how, if enacted, it could affect said client. Specifically, we monitored both Senate and House Full Committee, Conference and Floor action, met with various Hill staffers concerning the Title IV Section of HEA, and provided information to our client with legislative analysis. Included as attachment's A & B are copies of talking points which was shared with various Senators, Congressmen and hill staffers in order to express our client's concerns.

<u>DATE</u>	<u>CONTACT</u>
3/3/92	Kupka monitor's Senate Finance Committee mark-up.
3/4/92	Kupka monitor's Senate Finance Committee mark-up.
3/5/92	Kupka meeting w/Senator Kennedy staffer.
3/6/92	Kupka monitor's Senate Finance Committee mark-up.
3/11/92	Kupka meeting w/Senator Bentsen staffer.
3/20/92	Kupka meetings on hill w/staffers for Durenberger, Hatch, Thurmond, Kennedy, Kassenbaum, Pell, Harkin.
4/1/92	Kupka meeting w/Bob Bry Senate staffer.
4/6/92	Kupka meeting w/Sarah Flanagan Senate Staffer.
4/13/92	Kupka & McIntyre meeting w/Dinapoli House staffer.
4/15/92	Kupka meeting w/David Hoppe Senator Coats office.
4/20/92	Kupka meeting w/Bob Shireman Senator Simon office.
5/18/92	Kupka & McIntyre meeting w/Senator Simon.
5/20/92	Kupka meeting w/DiNapoli House staffer. (Congressman Coleman)
6/10/92	Kupka, McIntyre & Napier meeting w/Kent Talbert Senate staffer. (Senator Thurmond)
6/11/92	Napier & McIntyre meetings with Kent Talbert Senate staffer and Congressman Billy Ford.
6/11/92	Kupka meeting's w/Senate staffers; Simon, Durenburger, Wellstone, Thurmond, Kennedy, Pell, Kassenbaum.
6/15/92	Kupka colloquy language to Talbert. (See attachment D)
6/29/92	Kupka colloquy language to DiNapoli.

TALKING POINTS

REAUTHORIZATION OF THE HIGHER EDUCATION ACT

Eligibility of Foreign Institutions in the GSL Program

American University of the Caribbean Medical School

Statutory Language Recommended:

S. 1150 makes minor changes with regard to 20 USC Sect. 1085 current statutory language and eligible institution definitions, including the specific provision set forth allowing for "Foreign Medical Schools" participation. H. 4471 (formerly H. 3553) will eliminate 20 USCA Section 1085 (b) (c) & (n) and replaces it with 20 USCA 1088, which uses the definition of eligible institutions under 20 USCA Section 1141, thus eliminating all foreign schools for eligibility for the Stafford loan program.

President's FY92 Budget Recommendation:

Section 446. Section 446 of the bill would make a number of changes to the definitions in section 435 of the Act, dealing with the Guaranteed Student Loan Program. Primarily, several changes would be made to the definition of an "eligible institution." Foreign schools would no longer be eligible institutions for purposes of the GSL program with respect to students who are nationals of the United States.

Administration Rationale: "Eliminate eligibility for foreign schools, which tend to have high default rates"-FY92 Budget of the U.S. Government, Part Two-19.

Fact: According to U.S. Department of Education foreign schools combined have an average default rate world-wide of 5%. Specifically, AUC has been given an "Excellent Rating" by the Department of Education with defaults rates of 2.8% in 1987, 2.3% in 1988 and 2.1% in 1989. Whereas, the average U.S. domestic default rate was 13.1% in 1987, 13.3% in 1988, and 14.1% in 1989, 15.3% in 1990.

Administration Rationale: Many of the Title IV participation requirements are unenforceable against a foreign entity and there are no requirements of accreditation, licensure and certification applicable to foreign school participation. Thus there is no accountability for the GSL program funds.

Fact: AUC School of Medicine has been chartered by the British Colony Government of Montserrat and approved by the Ministry of Education in the West Indies. The Medical School is based on the U.S. standards of Medical training, which consists of the basic medical sciences and clinical studies. After graduation from AUC all graduates who enter U.S. residency programs must first obtain an ECFMG Certifications from the Educational Commission for Foreign Medical Graduates. The AUC student would obtain this by passing both part 1 and part 2 of the U.S. National Medical Board Examination. Further in order to secure a state's licensure in the U.S. the students must meet the following requirements;

- 1) ECFMG certification
- 2) Passing the FLEX or State's Medical Board Examination
- 3) Be a citizen or a permanent resident of the U.S.

In the last 3 years AUC graduates who have passed the U.S. National Medical Boards have 100% placement rate for Doctors who have sought out residency programs in the U.S. Thus not only are the requirements for a foreign medical student more stringent, in terms of certification then a U.S. student, but there is direct accountability for a high competence level for the Foreign student entering the U.S. medical market.

Administration's Rationale: Eliminating foreign school eligibility would not eliminate the opportunity for students receiving Title IV aid to study abroad.

Facts: The only students eligible for Title IV aid would be students enrolled in U.S. institutions with part of their curriculum which involves studying at a foreign institution. In other words, only elite, private institutions that have the luxury of having a semester program in Rome or maybe Paris. Chances are the students who are fortunate enough to be able to afford these schools don't need the financial aid anyway. This approach alleviates programs such as AUC which have low default rates and provide hundreds of needed Doctors and Nurses, who come back to the States and service our country in the health care industry.

Advocacy Points for Maintaining GSL Program for Foreign Schools:

There are many arguments for continuing GSL and SLS Loan programs for students of AUC.

First, historically, the American University of the Caribbean School of Medicine ("AUC") has a large percentage of minority students represented in the student population. AUC provides opportunities to minority students to study medicine that they would otherwise not have. Last year over fifty-one percent of the AUC student body belonged to minority groups. With this in mind, minority physicians are more likely to serve lower socioeconomic communities where health care is less assessable as compared to the general population. This theme is consistent with both the President and Congress in terms of;

- o Giving low-income and minority students an opportunity to gain advanced degrees in higher education;
- o Giving low-income students and minority students an alternative to the financially oppressive U.S. medical school system;
- o Alternative and expanded opportunity's to enter the Sciences and Medical profession, which is viewed as an Administration priority and area of great national need;
- o Expanding the higher education and professional school academic base within the low-income community, which will provide hope and role- modeling for future generations.

AUC graduates have a high likelihood of entering the primary care practices. There is a great national need to provide medical care for the old and impoverished. AUC students are providing basic health care as primary care physicians in most cases, rather than entering into a field of medical specialty. Considering that 71% of AUC graduates enter primary care, AUC helps to address the health care problems of this population and socioeconomic classification and fills a current void represented in the lack of medical students who want to enter the primary care sector. AUC also provide opportunities to older students who are unable to gain admission to U.S. medical schools because of their age. The average age of AUC students is 30 years.

Furthermore, 33% of AUC students have had occupations in the health care areas prior to attending AUC. Among some of the health care fields represented are nursing physician assistance, respiratory therapy, medical technology, chiropractic, and dentistry. These older students seek to further their education so that they may be qualified to offer wider range of health services to their parents. Nearly 90% of AUC students require financing assistance to attend AUC. AUC default rate was only 2.8% in FY87, 2.3% in

FY88 and out of 291 borrowers in repayment for FY89 2.1% were in default. According to the Department of Education all Foreign Schools default rates are lower than 5% world-wide. Whereas the Domestic GSL default rate hovers between 13% and 16%. Cutting off federal guaranteed student loan to AUC students would result in the loss of an important source of minority physicians. The Department of Education released the FY89 default rates on July 26, 1991 and stated that AUC had an "excellent" default rate status.

The demographics of the AUC student body clearly illustrates their dependence upon the GSL program and the direct impact that the AUC has on the U.S., in terms of medical students returning to the U.S. and becoming active within low-income and economically depressed medical communities.

DEMOGRAPHICS OF CURRENTLY ENROLLED AUC STUDENTS

Citizenship

USA	86%
Foreign	14%

Average Age of Students

30 years

Gender

Male	72 Students
Female	28 Students

Racial Composition

Minorities	51%
White	49%

Occupation of Students Prior to Matriculation at AUC

Student	45%
Health Professionals	33%
Business	23%

State of Residency

State %

CA	25
FL	11
GA	7
AL	6
SC	5
IN	4
MI	4
TX	4
AK	2
IL	2
MD	2
NY	2
PA	2
VA	2
WI	2
AR	1
CT	1
KY	1
MA	1
NJ	1
OK	1
RI	1

DEMOGRAPHICS OF AUC GRADUATES 10 YEARS AFTER GRADUATION

Area of Specialization

Primary Care	71%
Specialist	29%

State of Residency

State %

PA	19
NY	15
FL	14
MI	12
NJ	9
CA	4
TN	4
GA	3
OTHER	20

CODES FOR SELF-DESIGNATED PRACTICE SPECIAL SPECIALTIES*

ADL	Adolescent Medicine	BLB	Pathology, Blood Banking
AM	Aerospace Medicine	CMP	Pathology, Chemical
A	Allergy	CLP	Pathology, Clinical
A1	Allergy and Immunology	FOP	Pathology, Forensic
AN	Anesthesiology	RIP	Pathology, Radioisotopic
CD	Cardiovascular Diseases		
CCM	Critical Care Medicine	PD	Pediatrics
D	Dermatology	PDA	Pediatric Allergy
DMP	Dermatopathology	PDC	Pediatric Cardiology
DIA	Diabetes	PDE	Pediatric Endocrinology
		PHO	Pediatric Hematology-Oncology
DLI	Diagnostic Laboratory	PNP	Pediatric Nephrology
	Immunology	PDP	Pediatric Pulmonology
EM	Emergency Medicine	PA	Pharmacology, Clinical
END	Endocrinology	PM	Physical Medicine and
FPS	Facial Plastic Surgery,		Rehabilitation
	Otolaryngology	P	Psychiatry
FP	Family Practice		
GE	Gastroenterology	CHP	Psychiatry, Child
GP	General Practice	PYA	Psychoanalysis
GPM	General Preventive Medicine	PH	Public Health
GER	Geriatrics	PUD	Pulmonary Diseases
GO	Gynecological Oncology	RO	Radiation Oncology
		R	Radiology
GYN	Gynecology	DR	Radiology, Diagnostic
HEM	Hematology	PDR	Radiology, Pediatric
IG	Immunology	REN	Reproductive Endocrinology
IP	Immunopathology	RHU	Rheumatology
ID	Infectious Diseases		
IM	Internal Medicine	ABS	Surgery, Abdominal
LM	Legal Medicine	CDS	Surgery, Cardiovascular
MFM	Maternal and Fetal Medicine	CRS	Surgery, Colon and Rectal
MM	Medical Microbiology	GS	Surgery, General
NPM	Neonatal-Perinatal Medicine	HS	Surgery, Hand
		HNS	Surgery, Head and Neck
NEP	Nephrology	NS	Surgery, Neurological
N	Neurology	ORS	Surgery, Orthopedic
CHN	Neurology, Child	PDS	Surgery, Pediatric
NA	Neuropathology	PS	Surgery, Plastic
NM	Nuclear Medicine		
NR	Nuclear Radiology	TS	Surgery, Thoracic
NTR	Nutrition	TRS	Surgery, Traumatic
OBG	Obstetrics	U	Surgery, Urological

OM Occupational Medicine

ON Oncology

OPH Ophthalmology

OTO Otolaryngology

PTH Pathology, Anatomic/Clinical

ATP Pathology, Anatomic

**In addition to the above, the following
specialty designations are also used:**

OS Other, i.e., a specialty other
than those appearing above.

US Unspecified specialty

***Above is alphabetical list by specialty name (not code)**

Recent AUC Graduates in Iowa

Calvin Atwell, M.D.
2021 Mulberry Ave
Muscatine IA 52761
GS

Steven Dawson, M.D.
4130 Concord Plaza Apt # 2
W Des Moines IA 50265
PD

Askwinkumar Joshi, M.D.
2588 Hubbell Avenue
Des Moines IA 50316
FP

Mark Luttrell, M.D.
720 17th-8
Des Moines IA 50314
PDU

Recent AUC Graduates in Illinois

Asghar Ali, M.D.
2211 W Montrose # 3B
Chicago IL 60618
US

Anthony Blazys, M.D.
5520 S Whipple
Chicago IL 60629
IM

Laura Glab, M.D.
643 S Grant Street
Hinsdale IL 60621
NM

Ronald Kuchmek, M.D.
220 Willow Drive W
Plainfield IL 60544
US

Richard Kurz, M.D.
43178 N Hwy 45
Antioch IL 60002
FP

Eugene McCray, M.D.
4219 S Princeton
Chicago IL 60609
US

Robert McElroy, M.D.
117 Sagebrush Drive
Belleville IL 62221
PM

Adekunle Oshiyoye, M.D.
PO Box 487301
Chicago IL 60649
OBG

Marvin Pierce, M.D.
1025 Baldwin Avenue # 403
Waukegan IL 60086
FP

Antranik Poladian, M.D.
423 Florence Avenue
Evanston IL 60202
PD

Birute Pumputis, M.D.
14608 W 143rd Street
Lockport IL 60441
FP

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**TALKING POINTS
AGAINST THE HOUSE PROPOSAL WHICH
RESTRICTS ELIGIBILITY FOR FOREIGN MEDICAL SCHOOLS
IN THE GSL PROGRAM**

The draft proposal that the House staff is submitting for consideration to the members conference today is extremely damaging to all foreign medical schools.

FACTS:

- o Foreign medical school graduates make up 22% of all the United States domestic doctors. (*American Medical Association statistic)
- o Foreign medical graduates have to pass the same examinations as the U.S. medical students (plus one additional exam FEMGEMS) and are placed in the exact same residency programs.
- o Foreign medical schools have the lowest default rates in the entire Department of Education GSL loan program at around 3%.
- o Foreign medical school graduates tend to specialize their practice in primary care and also tend to serve poor urban and rural communities.

PROBLEMS WITH THE HOUSE PROPOSAL

The main problem with the House proposal is that it does not tighten current eligibility requirements for a foreign institution into the GSL program, it effectively eliminates their eligibility.

- o The proposal puts a unjustified burden on the foreign medical school to be responsible for "Institutional Information". The fact is that currently FEMGEMS does not release current data with respect to passage rates broken down by foreign institutions, it is up to the students to self-report their scores back to the foreign institution. Which would make for inaccurate and incomplete records which would be deemed a failure of the foreign institution and make them ineligible.
- o The House proposal would create a U.S. Department of Education review board, which would qualify and evaluate the standards of accreditation applied to the applicant foreign medical school and determine the comparability of those standards to standards for accreditation applied to U.S. medical schools. Most country's around the world certify or control their own medical schools through their respective Ministry's of Education. The private accrediting process used in the U.S. and Canada are unique to those country's. This type of U.S. Department advisory panel would serve as an ethnocentric governing board that had the

authority to eliminate smaller country's medical services and school's by eliminating access to the GSL program.

- o The House proposal is based on the FEMGEMS test which will be eliminated by July of 1993. Starting in 1994 all U.S. and foreign medical school graduates and students will only be able to take the USMLE Step 1, Step 2 and Step 3 Exams to fulfill ECFMG Certification and state licensure requirements.
- o Mandating the 60 and 60 rule will effectively eliminate most foreign medical schools in the caribbean and Mexico. Which was not the original intent of the Department of Education or the House.

A BETTER SOLUTION

The old adage "if it ain't broke don't fix it." seems to apply here. Everyone wants to make big changes in the REA but here is a program that does not cost the taxpayer's any money and at the same time helps educate minority's and other american's to the level of a medical doctor, who would otherwise not be.

The program is roughly 30 million dollars total, less than 3/10 of one percent of the 10 billion dollar GSL loan program.

If changes must be made the following would be helpful guidelines that will tighten requirements for eligibility and help eliminate the "sham" medical schools and maintain the successful and legitimate foreign medical schools.

- 1) All students applying for admission to attend a foreign medical school are required to have graduated with a four year baccalaureate degree from an undergraduate institution of higher education and a minimal of one academic year of the following general premed courses: general chemistry, organic chemistry, general physics and general biology, prior to acceptance by said foreign medical institution.
- 2) By requiring all foreign medical schools to submit to U.S. jurisdiction and maintain an agent within the U.S. who is authorized to receive service of process for the eligible institution.
- 3) Have all foreign medical schools certified by the foreign country's government or department of Education.
- 4) Exclude permanently any foreign school ever convicted of a crime involving corruption, fraud and embezzlement, including any Racketeer Influenced and Corrupt Organizations (RICO) violations.

Colloquy between Senator Strom Thurmond (R-SC) and Senator Claiborne Pell (D-RI) with respect to the conference committee amendments to S. 1150, the reauthorization of the Higher Education Act, July 1, 1992.

Senator Thurmond: With regard to the reauthorization of the Higher Education Act, I would like to ask my distinguished colleague, the senior Senator from Rhode Island and Chairman of the Subcommittee on Education, Arts & Humanities, a few questions about a specific amendment agreed to by the House and Senate Conferees relating to the eligibility of foreign institutions, particularly foreign medical schools, in the Stafford (GSL) Loan Program.

Senator Pell: I would be happy to respond to any questions the distinguished Senator from South Carolina might have with respect to the eligibility of foreign medical schools for the Stafford Loan Program.

Senator Thurmond: It is my understanding that section 481(a)(2)(A)(ii) was amended by adding the words ",or" "(iii) the institution's clinical training program was approved by a State as of January 1, 1992."

Senator Pell: That is correct Senator.

Senator Thurmond: Senator, it is also my understanding that this amendment's language was specifically drafted and intended to include schools like the American University of the Caribbean Medical School (AUC) in Montserrat, West Indies. AUC was recommended by the State of California's, Board of Medical Quality Assurance and approved as having met all State licensing requirements, thus AUC was deemed as having a qualified medical school curriculum. The State of California's recommendation enables foreign medical school's students to participate in a clinical training program within a State approved hospital, pursuant to section 1327 of the California Code of Regulations as of January 1, 1992.

Senator Pell: That is correct Senator. The amendment agreed to was to allow schools like the American University of the Caribbean Medical School (AUC) and Ross University Medical School to maintain their current status as eligible foreign institution's under the Stafford Loan Program.

Senator Thurmond: Senator, it is also my understanding that in Section 481 (a)(2)(A) that the foreign medical schools have to comply with either category (i) and (ii) or category (iii) by itself is that your understanding as well?

Senator Pell: Yes Senator, under Section 481 (a)(2)(A) all foreign medical schools will have to fully comply with either category (i) which requires the foreign institution to maintain 60% of their student enrollment as non U.S. citizen's and the

foreign institution must have a 60% passage rate of their foreign medical graduates during the course of 1 (one) year or be able to meet the criteria set forth in category (iii) of having had an approved clinical training program in any State in the U.S. as of January 1, 1992.

Senator Thurmond: I thank you for clarifying the intention of this amendment. It is obvious to me that if this amendment was misinterpreted, it could have a devastating effect on a number of quality foreign medical schools such as the American University of the Caribbean, which every year educates several medical doctors who come back to the urban and rural areas of my State of South Carolina and make a significant difference in the health care quality and availability for thousands of people in my home state as well as all over the U.S. I want to be clear, so that there is no misunderstanding as to what the word "approved" in section 481 (a) 2 (A)(iii) is interpreted to mean in the amendment.

Senator Pell: Senator, you are absolutely right. There is no doubt that the amendment was designed to include clinical training programs, at State approved hospitals and not just approved directly by the States themselves. Very few states actually give direct approval of the clinical training programs. Rather, most states give State approved hospitals authority to approve clinical training programs for medical schools which have been recommended or certified by the state as having a qualified medical school curriculum.

Senator Thurmond: I want to thank the senior Senator from Rhode Island for clarifying this amendment for me.

Registrant: McNair Law Firm, P.A.
Registration#: 4534

The following persons in your organization filed short form registration statements on the date indicated by each name. These short forms are still in an active status. Please review and update where appropriate.

Date Filed	Name	Current Role	Termination Date?
7/03/91	Steven M. Kupka	YES	N/A
7/03/91	James T. McIntyre, Jr.	YES	N/A
7/17/91	John L. Napier	YES	N/A

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