



PAKISTAN MEDICAL COMMISSION
(SUCCESSOR OF PAKISTAN MEDICAL & DENTAL COUNCIL)
G-10/4, MAUVE AREA,
ISLAMABAD.

Dated: 28th April, 2022

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Subject: **RESERVATIONS ABOUT PAKISTAN MEDICAL COMMISSION ACT, 2020**

Reference to your letter No.F.1-6/2018-PMC/NHSR&C dated 26th April, 2022 on the subject cited above. The desired report on the subject matter is submitted as below:

Report on concerns of the Government of Sindh on PMC/MDCAT related matters:

1. Representation of Provinces

The Pakistan Medical Commission consists of the following three distinct arms;

- a) The Medical & Dental Council, consisting of 9 members including the Surgeon General of the Pakistan Army, the Federal Secretary Health, three senior medical practitioners, one senior dental practitioner and three lay members representing the public from the professions of finance, law and philanthropy etc. The Council is the policy making body;
- b) The National Academic Board, consisting of 20 members including the Chairman HEC, President College of Physicians and Surgeons, two vice chancellors or deans nominated by each Province and the Federation from public and private colleges, three members from the medical faculties, two members from the basic science faculties and two members from the dental faculties. The Board is mandated to formulate amongst other;
 - I. the undergraduate curriculum,
 - II. the MDCAT curriculum and structure,
 - III. the NLE curriculum and structure,
 - IV. undergraduate college and teaching hospital accreditation standards,
 - V. post graduate teaching hospital accreditation standards.
- c) The National Medical Authority, consisting of 7 full times members mandated as the executive management of the Commission.

The National Academic Board being the principle body entrusted with the formulation of the key standards of education, teaching institutions and examinations has representation from each Province and from the relevant institutions both public and private as well as the principle post graduate authorities. The current National Academic Board has members nominated by each Province except Sindh who have not since inception in 2020 nominated any members to the Board and the seats remain vacant. The Chairman of the Board currently is a dean of a college (Agha Khan University) in Sindh nominated to the Board and appointed by the Federal Government as Chairman.

While the Council has representation nationally and currently the Council consists of one medical practitioner from Sindh and two from Punjab and one dental practitioner from KPK/Federal.

2. National MDCAT Examination

- a) The PMC Act 2020 mandated that the entrance exam (MDCAT) shall be held nationally rather than provincially by admitting universities as was done previously.
- b) The concept of a national MDCAT was previously deliberated upon by the erstwhile PM&DC Council in 2019 also and it was decided to prepare a proposal for it to hold it the next year. It was a consensus that a single national level MDCAT with a single standard was required.
- c) In the past the MDCAT exam was held in each province separately by a designated university. The following critical issues had come forth in this process;
 - (i) The exam in different provinces was not of the same standard with provincial universities drastically reducing the difficulty level of the exam to ensure maximum passing percentage, which represented a negation of the very purpose of an entrance exam.
 - (ii) There were constant complaints of the exam paper being leaked prior to the exam and major issues in the pen and paper format.
 - (iii) Majority of the exam paper was driven by the tuition academies which had been setup charging exorbitant amounts from students to prepare them for the MDCAT exam.
 - (iv) The large pool of students passing the MDCAT allowed lower merit students to obtain admission in private colleges in consideration of donations which was an acknowledged practice by colleges thereby granting admission to lower merit students.
 - (v) A lower academic quality of students being admitted to medical colleges would result in a lower quality of doctor being produced by these colleges.
- d) The National MDCAT exam provides a level playing field for all students across Pakistan.

- e) For private colleges students were taking multiple MDCAT exams offered by different provinces to enable them to seek admission possibility in the private colleges in different provinces. A national single MDCAT provided students the ease to take a single exam for national level admissions.

3. MDCAT Curriculum

- a) The MDCAT Curriculum was formulated by the National Academic Board pursuant to its powers under Section 13(c) of the PMC Act, 2020.
- b) The National Academic Board invited representatives of the Higher Secondary Boards of all Provinces, the Federal Education Board, the Army Public Schools and the IBCC to assist in formulating the MDCAT Curriculum. All invited participants participated except from the Sindh Higher Secondary Boards. However, the notified curriculum of HSSC/FSc of Sindh Boards was made available by IBCC for consideration.
- c) The fundamental principle mandated by the Board for the MDCAT Curriculum was to include those topics in each subject which were common to all HSSC Boards. This ensured that no topic was included in the MDCAT Curriculum which was not part of the curriculum of any of the HSSC Boards.
- d) The final curriculum prepared was certified by IBCC to represent only common topics from all HSSC Boards and not in excess of any existing provincial curriculums.
- e) Post examination on the directions of the Federal Government, the post exam analysis was carried out independently by Quaid-e-Azam University and questions which were found not to be sufficiently discriminatory were marked back students received a mark for such questions as per international standards of a post exam analysis.
- f) It is clarified that the MDCAT Curriculum is based on a common curriculum of all HSSC Boards of all Provinces and regions contrary to the false propaganda by certain quarters that the MDCAT Curriculum was based on the Federal Board only. Furthermore, the MDCAT Curriculum is a public document and has been available publicly since April 2021. No Provincial or other education department has identified any topics contained in the Curriculum as being outside their local curriculums.
- g) To further address any concerns of any Province or region, the Commission has for the 2023 MDCAT called a national seminar in May 2022 of all education departments of each Province, Federation, Pakistan Army Schools and IBCC. Any topics highlighted by the participants as being outside their current local curriculums as per directions of the National Academic Board shall be removed from the MDCAT Curriculum.

4. MDCAT Passing Marks

- a) The National Academic Board, after analyzing the results of the 2020 MDCAT, pursuant to its powers under Section 13(c) of the PMC Act, 2020 notified the passing marks for the MDCAT to be 65% or 137 marks out of 220.
- b) The passing marks were increased from 60% in 2020 to 65% in 2021.
- c) Consideration for increase amongst other things was to enhance the competitive nature of the exam and ensure that academically the best students are admitted to medical and dental programs with a view to improving the quality of doctors produced nationally as well as the fact that the curriculum had been reduced and hence the preferred high competition level of 3 students per available seat should be maintained.
- d) A comparison of the 2020 and 2021 MDCAT results confirm the basic premise of increase in the MDCAT passing marks as in fact the total number of students who qualified in 2021 slightly increased to 68,550 from 67,937 in 2020. Overall the competition for seats remained at approximately the same at 3.3 : 1 in terms of students to seats ratio.

Province	Total Candidates Attempted MDCAT		Candidates Qualified		Allocated Seats Medical & Dental
	2020	2021	2020 (Passing: 60%)	2021 (Passing: 65%)	
Khyber Pakhtunkhwa	32,615	41,690	15,467	12,225	3315
AJK	2,767	3,880	1,969	1,478	430
Balochistan	5,979	7,285	1,942	1,540	674
ICT	1,046	4,664	783	2,150	1225
Gilgit Baltistan	1,096	1,295	779	456	0
Punjab	52,864	100,160	38,710	42,890	9651
Sindh	25,254	34,932	8,287	7,811	5540
NATIONAL TOTAL	121,621	193,906	67,937	68,550	20,835

- e) After the MDCAT exam had been concluded and admissions started in December 2021 a request was received from the Sindh Government to consider lowering the passing marks for MDCAT from 65% to 50%. The matter was referred to the National Academic Board however, the request was refused and detailed response with reasons provided to the Sindh Government.
- f) The reasons included;
- (i) There being 7,811 students of Sindh domicile who had qualified the MDCAT as against a total of 2,900 public college seats (medical and dental) where a domicile restriction existed. After admitting 2,900 students from the MDCAT qualified students almost 4,900 students of Sindh domicile would remain in the field competing for a total of 2,590 private college seats (medical and dental). Therefore, no student of Sindh would be deprived as per merit.

- (ii) As per the Constitution of Pakistan a person has the right to seek and obtain education anywhere in Pakistan in a private institution. The domicile restriction is imposed on public colleges by Provinces in view of the Provincial Government funding the education in public colleges for its domicile residents. Therefore, for the private colleges of Sindh the pool of students available in addition to the remaining 4,900 students of Sindh domicile were another 46,000 students from across Pakistan. Students from all over Pakistan seek and obtain admission in private colleges irrespective of the Province. Therefore, no shortage of qualified students existed for private colleges in Sindh.
 - (iii) The passing marks for MDCAT had been in April 2021 notified as 65% as approved by the National Academic Board. No objection was raised at that time or anytime even up to the conclusion of the MDCAT exam. It would therefore, be unfair to the 68,000 who had qualified to change the passing marks at such a late stage when admissions had already begun nationally, and if the passing marks were lowered nationally it would result in an increase of a further 75,000 to the pool of students qualified to obtain admission.
 - (iv) The purpose of the entrance exam is to select the best qualified student while lowering the standard would negate the objective of selecting quality students being admitted to medical and dental programs. When a student with 85% marks was available for admission why would a college want to admit a student with 60% marks? The request of the Sindh Government to reduce the MDCAT passing marks to 50% would result in an increase only in Sindh of 13,751 qualified students bringing the total qualified students in Sindh to 21,562 competing for a total of 5,540 medical and dental seats in Sindh. This increased pool of students would have the consequence of encouraging private colleges to demand donations and admit students outside merit hence also depriving students on merit from admission, as had been the known practice in the past.
 - (v) Furthermore, lowering the merit and hence increasing the pool to allow lower merit students to obtain admission would be contrary to the Constitutional dictate to ensure admission to higher education strictly on merit.
 - (vi) A student who obtains admission to a medical college and graduates and obtains a license can practice medicine anywhere in Pakistan and is not restricted to their province of domicile. Therefore, to ensure that every citizen of Pakistan, irrespective of their residence, obtains quality health care by a quality healthcare professional it is imperative that the best quality student is admitted to medical and dental college.
- g) The principle of merit and higher quality of student being selected for medical and dental programs was upheld by the August Supreme Court of Pakistan in its Judgment dated 27.09.2021 in the Abwa Medical College case and further reiterated and upheld in the Judgment dated 18.03.2022 of a Larger Bench of the Honourable Sindh High Court declaring the earlier notifications of the Sindh Government reducing the MDCAT passing marks to 50% as void and thereby

upholding the MDCAT passing marks at 65% as determined by the National Academic Board.

- h) A similar issue raised in 2020 by some private colleges and students relating to the MDCAT passing marks of 60% had been rejected by the Honourable Sindh High Court while rejecting the injunctions sought vide Order dated 02.07.2021 in Suit No.584/2021 and others. Five private dental colleges in Sindh who had in 2020-2021 admitted students having failed the MDCAT exam, during a hearing before the Commission, consented that in view of the Judgment of the August Supreme Court of Pakistan in the Abwa Medical College Case they would not press for regularization of students admitted by them provisionally who had not qualified the MDCAT. However, to facilitate these colleges, the Commission vide its Order dated 10.01.2022 permitted them to apply for regularization of any MDCAT qualified students admitted and not previously notified.
- i) However, in order to address this issue of MDCAT passing marks for the future, the Authority has proposed to the National Academic Board consideration of a proposal put forth by some dental colleges to have a separate MDCAT passing mark for medical colleges as against dental colleges. To place before the Academic Board a comprehensive proposal all Dental Colleges of Pakistan have been invited for a conference in May 2022 to formulate the detailed proposal and reasons for consideration of the Academic Board. The intent is to have a final decision on this issue by end of May 2022, well before the holding of the 2022 MDCAT exam.

5. Vacant Seat Issue in Sindh Dental Colleges

Province	Public MBBS	Private MBBS	Public BDS	Private BDS	Total
Punjab	29	24	86	228	367
Sindh	149	185	40	588	962
KPK	0	4	0	7	11
Baluchistan	17	0	5		22
ICT	5	8	2	24	39
AJ&K	8				8
Total	208	221	133	847	1409

Name of College		2020-21		2021-22	
		Total Seats	Vacant Seats	Total Seats	Vacant Seats
1	Altamash Institute of Dental Medicine	80	44	80	79
2	Baqai Dental College	75	69	75	71
3	Bhittai Dental & Medical College	80	69	80	76
4	Dental College Sir Syed College for Girls	50	44	50	46
5	Dental Liaquat College of Medicine & Dentistry	75	48	75	72
6	Fatima Jinnah Dental College	80	39	80	80
7	Isra Dental College	50	43	50	44
8	Muhammad Dental College	50	43	50	50
Total		540	399	540	518

- a) Sindh has the largest vacant seats with 962 and majority of those being 588 in the Private Dental Colleges. Out of these 588 vacant seats in private dental colleges, 518 are in 8 private dental colleges who admitted only 22 MDCAT qualified students and provisionally admitted 518 MDCAT failed students.
- b) The primary reason for the vacant seats in Sindh colleges is admission of students who had failed the MDCAT however, students pursuant to the Sindh Government notified, later set aside by the Honourable Sindh High Court, allowing students up to 50% MDCAT score to be admitted.
- c) The majority of the vacant seats are in dental colleges with over 70% of all vacant seats being in dental colleges. The primary reason is a trend which has been seen in the last three years of students no longer choosing dental programs due to increasing tuition fee in the private sector and reduced opportunities in the dental field in the absence of dental jobs available in the public sector across Pakistan.
- d) The private colleges themselves admit that majority of the students who take admission in dental colleges do so as a second choice and only because they did not obtain admission in a medical program. It is a considered view that until and unless there is an increased employment and earning opportunity in the dental practice this trend is not going to increase and will continue to decrease.
- e) To accommodate colleges in respect of vacant seats the Commission promulgated a Vacant Seat Policy after closure of national admissions. To ensure transparency and meritocracy, the PMC allowed all unadmitted students to apply for the vacant seats. Accordingly, over 17,000 MDCAT qualified applications were received from unadmitted students. The Commission forwarded the lists organized, based on merit, to all the public and private colleges to consider these students for admission. The admissions were thereafter, undertaken by each colleges or their designated university directly with admissions nationally closing on 10th March, 2022. This was a special window of opportunity given to colleges.
- f) However, even after such a large number of available students, many colleges specially private colleges in Sindh did not admit these available students wanting to retain the MDCAT failed students they had admitted and seeking their regularization by the Honourable Sindh High Court. However, the Honourable Sindh High Court vide its Judgment dated 18.03.2022 declared that such students do not have a right to admission. Had the colleges taken up the option to admit these available MDCAT qualified students the vacant seats would have been almost nonexistent.
- g) The Commission in addition to assist both colleges and students initiated the National Medical Scholarship Fund making available Rs.350 million to grant in scholarships to students on merit and on need basis specifically for private colleges where tuition fee is high. The Commission has granted hundreds of such scholarships to students upto Rs. 1 million per year to assist high merit students to afford private education. These students were in the past deprived of

admission due to their inability to afford the fee whereas students with much lower merit gained admission solely on the basis of having the financial means to pay fees. Unfortunately the colleges did not fully avail this facility or allow students to avail it by refusing to admit students on merit.

- h) Notwithstanding the above, the Authority has called for a meeting of the Private Dental Colleges of Sindh to address the issue of vacant seats. The meeting was scheduled for 28th April 2022 however, the colleges have requested for it to be scheduled immediately after Eid to enable all of them to participate. The purpose of the meeting is to discuss possible solutions to assist the colleges in this issue.

6. 50% Weightage of MDCAT for Public Colleges Only

- a) The requirement for 50% weightage in calculation of merit for public colleges as stipulated under Section 18(3) of the PMC Act, 2020 was a result of the proposed amendment to the Pakistan Medical Commission Bill 2019 tabled by Honourable Members of the National Assembly Mr. Khawaja Muhammad Asif, Mr. Shahid Khaqan Abbasi, Mr. Khurram Dastgir Khan, Mr. Ahsan Iqbal Chaudhry, Mr. Rana Sana Ullah Khan and Mr. Mohsin Nawaz Ranjha and as approved and passed by the Parliament.
- b) The purpose of mandating a 50% weightage of MDCAT result in calculating the merit of public colleges was to ensure that the National MDCAT provided a fair and competitive representation of merit nationally and it ensured that by and large students admitted to medical and dental colleges across Pakistan were competing at the same level and of the same quality resulting in quality doctors of tomorrow.
- c) While this mandatory requirement is not imposed on private colleges, the Commission in its Admission Regulations 2021 has made it mandatory upon the private colleges to submit their admission criteria a year in advance which is reviewed by the Commission to ensure fairness and transparency in terms of calculation of merit. This further ensures that all students are aware of what they have to achieve to obtain admission in their colleges of choice. Many private colleges in 2022 gave MDCAT a 50% weightage in calculation of their merit criteria.



Secretary

Pakistan Medical Commission

Cc:

- Secretary, M/o NHR&C, 3rd Floor, Kohsar Block, Pak Secretariat, Islamabad.
- SPS to Federal Minister for Health, M/o NHR&C, 3rd Floor, Kohsar Block, Pak Secretariat, Islamabad.
- Spl. Assist. to the Vice President/ President, PMC.