

To the Head of the Presidential Administration A. Y. Bogdan

Minister of Education and Science of Ukraine L. M. Grinevich

Acting Minister of Health of Ukraine U. N. Suprun

First Deputy Head of the Security Service of Ukraine I. G. Bakanov

Presidential Adviser of Ukraine on medicine issues Y. O. Komarovskiy

President of V. N. Karazin Kharkiv National University, Academician V. S. Bakirov

Dean of the School of Medicine of V. N. Karazin Kharkiv National University
I. V. Belozerov

Extraordinary and Plenipotentiary Ambassador of India in Ukraine Partha Satpathi

Extraordinary and Plenipotentiary Ambassador of Nigeria in Ukraine
Martyn S. Adam

Extraordinary and Plenipotentiary Ambassador of Jordan in Ukraine
Ziyad Hazer Saleh al-Majali

Extraordinary and Plenipotentiary Ambassador of Turkmenistan in Ukraine
N. A. Amanmuradov

Extraordinary and Plenipotentiary Ambassador of Uzbekistan in Ukraine
B. Y. Ibragimov

Extraordinary and Plenipotentiary Ambassador of Israel in Ukraine Joel Lyon

Extraordinary and Plenipotentiary Ambassador of Turkey in Ukraine
Yagmur Akhmet Gulder

Extraordinary and Plenipotentiary Ambassador of Morocco in Ukraine
Fawz El Ashabi

Extraordinary and Plenipotentiary Ambassador of Azerbaijan in Ukraine
Azer Khudiyev

Extraordinary and Plenipotentiary Ambassador of Palestine in Ukraine
Mohammed Kasem Al-Asaada

Appeal of students of the School of Medicine

Dear Sirs and Madams!

On behalf of the Student Council, the Council of Foreign Students and all students of the School of Medicine of V. N. Karazin Kharkiv National University (hereinafter referred to as V. N. Karazin Kharkiv National University) we inform you of numerous violations of students' rights, the Laws of Ukraine and other normative legal acts at Implementation of the Unified State Qualification Exam (hereinafter - USQE) for graduates of higher education "Master" and "Specialist" in the field of knowledge "22 Health Care", scheduled for July 1-3, 2019, by the Ministry of Health of Ukraine (hereinafter - the Ministry of Health) in the medical

institutions of higher education of Ukraine (further - IHE). We ask you to ensure compliance with the Laws of Ukraine in all possible and accessible ways!

One of the components of the USQE is the International Foundation of Medicine (hereinafter - IFOM), whose integration into the educational process is contrary to current legislation, violates students' rights and jeopardizes the future of the national system of higher medical education in general.

On June 6, 2019, a student conference was held at the School of Medicine of V. N. Karazin Kharkiv National University, which was attended by more than 450 foreign students and students of the Ukrainian medical schools. Speakers and observers were also present: Dean of the School of Medicine, Doctor of Medicine, Full Professor I. V. Belozarov, Deputy Dean of Educational Work of the School of Medicine, Candidate of Medicine, Associate Professor O. O. Vlasenko, Deputy Director of the Educational-Scientific Institute of International Education on Educational and Adaptation Work A. S. Polivantsev, Specialist of the I category of the Educational and Scientific Institute of International Education M. O. Bilovsky, students of other courses and instructors of the School of Medicine.

Representatives of various student organizations and communities made speeches and reports on numerous violations in the process of integrating IFOM as a control measure in 2019 when receiving higher medical education. During the event delegates of the student conference were selected, which would represent the interests of students in various instances, including the formation of claims to the Kyiv administrative court to challenge the legality of certain resolutions of the Cabinet of Ministers of Ukraine (hereinafter - the Cabinet of Ministers of Ukraine) and orders of the Ministry of Health. The delegates of the conference were selected: Anastasia Sereda, Denis Ivanchenko, Mariya Nelyapina, Asrorov Madamin, Ezekwu Precious, Gulshan Kumar Yadov, Nishant Kumar, Said Fais Ali, Abdulla Raxman, Shubhas Kumar, Rushul-in-Chief.

According to the results of the analysis of the Law of Ukraine on Higher Education, the Law of Ukraine on Protection of Personal Data, certain resolutions of the Cabinet of Ministers of Ukraine, orders of the Ministry of Health, the Regulations on the organization of educational process at the V. N. Karazin Kharkiv National University and other normative-legal acts and by consolidating the reports of conference speakers we inform you that during the implementation and conducting of IFOM, numerous violations of current legislation and students' rights were committed:

The Law of Ukraine on the protection of personal data (Article 1, paragraph 6, Article 2, paragraph 1, etc.).

- There is a violation of the right to prohibit the processing and transfer of personal data to third parties who are representatives of a private foreign agency without the consent of students, which is especially relevant for foreign students, the current legislation and foreign policy of these countries prohibit such actions providing personal data to foreign agencies.
- The consent for the processing of personal data should be provided for in a contract for education with the Higher Education Institution. In the absence of such a clause in the contract (there is no such clause in our contracts!), There is absolutely groundless reason for the student's refusal to give such consent, and forcing students from higher education to agree to send and process their personal data abroad to a private foreign agency (as the MOH plans!) will have the effect of appealing against such actions in court.

The Law of Ukraine on Higher Education (Section 2, Article 6, Paragraph 1, Section 3, Article 10, Paragraphs 1-4, Section 5, Article 16, Paragraph 6, Section 8, Article 45, Paragraphs 2, 4, Section 8, Article 46, paragraph 1, section 9, article 47, paragraph 2, etc.).

- The standards of higher medical education that are in force do not provide for an IFOM exam.
- The curriculum developed and approved by the Academic Council of the Higher Education Institutions, the sequence of studying disciplines, the schedule, the Regulations on the organization of the educational process of V. N. Karazin Kharkiv National University, individual student training plans do not foresee an IFOM exam.
- There are no recommendations on quality assurance in the European Higher Education Area for the use of the IFOM exam.

- The contents of the external independent evaluation programs (including the IFOM application) should have been available (but not available!) To students before beginning their studies, that is, in the case of contracting with students in 2016 contracts with a higher education institution for study.
- Students' right to open external independent evaluation is violated, full and timely informing students about programs, terms and procedures for external independent evaluation is violated.
- IFOM does not exist in the individual curricula of students, therefore they can not be deducted from the Higher Education Institutions not only because they did not pass, but even because they did not participate in this exam, which contrary to the legislation of Ukraine.
- As of the beginning of the current academic year 2018/2019 (September 1, 2018), with the approval of the Regulations on the organization of the educational process the IFOM exam was not included in the educational process, since the institutions of higher education did not receive any instructions from the authorized body.

Resolution of the Cabinet of Ministers of Ukraine "On Approval of the Procedure for the Implementation of the Unified State Qualification Exam for Graduates of Higher Education "Master" and "Specialist" in the specialties of the field of knowledge "22 Health Care" of March 28, 2018, No. 334, as amended in with the Resolution of the Cabinet of Ministers of Ukraine No 308 dated 03/04/2019.

- For the implementation of the Resolution of the Cabinet of Ministers No 334, the Ministry of Health did not approve the order to introduce its norms in the educational process of higher education institutions, did not register it at the Ministry of Justice of Ukraine, and therefore did not ensure its implementation by educational institutions.
- Less than a month before the IFOM exam, the criteria for selecting a foreign agency of the Ministry of Health are not approved or published, which violates such basic principles of conducting a qualification examination as transparency and publicity.
- Contracts for higher education between students and higher education institutions were concluded at the beginning of education in 2016. In contracts, the student's tuition fee, which is valid for all six years of study, is fixed and does not change without the signing of an additional agreement, and the existing contracts did not set the cost of completing the IFOM exam and additional payments for its recapitulation.

The Order of the Ministry of Health No. 419 dated January 19, 2019 "On Approval of the Procedure, Terms and Time for the Development and Conduct of a Unified State Qualification Exam and the Criteria for the Evaluation of Results" (registered with the Ministry of Justice of Ukraine on March 20, 2019 under No 279/33250, published April 11 2019).

- Less than a month before the IFOM was formed, the terms of conduct and the criteria for evaluating the exam results were not approved by the Ministry of Health and the terms of the exam are being changed for the fifth time. The last change from 05.06.2019 (Order of the Ministry of Health No. 1252) contradicts the schedule of the organization of the educational process, which the IFOM exam and its reassembly are intended for the period of student and instructors holidays, thus violating their rights.
- There is no complete specification of the IFOM exam from the Ministry of Health, which should have been prepared no later than six months before the date of the exam in analogy to the other two test components of the USQE - the KROK exam and the English proficiency exam.
- Less than a month before the examination, the Ministry of Health did not approve the selection criteria for a foreign agency, and the Testing Center at the Ministry of Health did not select a foreign agency.
- The timetable for the constituent components of the USQE in 2019 was to be approved by the Ministry of Health by September 1, 2018, and before the beginning of the educational process - in educational institutions. Instead, the terms of the USQE in 2019 are changing for the Fifth time.
- Less than a month before the IFOM exam, the size of the "Passed" criterion for this exam is NOT approved by the Ministry of Health. Pilot testing for third-year students, was NOT conducted ! Therefore, it is impossible to establish a substantiated criterion "passed" at all.

Open letter from Presidents and Vice-Presidents of ALL WITHOUT EXCLUSION of high medical institutions of Ukraine from October 23, 2018.

- None of the managers of Medical Higher Educational Institutions did not support the implementation of the IFOM exam, and the general decision of the conference with the participation of leading specialists in

the field of higher medical education is directed against integrating the IFOM exam and involving a foreign agency in this process.

Regulations on the organization of the educational process at V. N. Karazin Kharkiv National University.

- The standards on which the contents of the IFOM exam are absent, the list of disciplines included in it and the sequence of their study do not correspond to the curricula that educational institutions use. Therefore, this test should be preceded by a change in the content of the training.
- At the beginning of the academic year, the student has the right to review the content of all control measures that are provided by the curriculum and the individual plan, with examples of tasks, content of control measures, form of conducting, evaluation criteria and dates. Each of these points is violated during the implementation of the IFOM exam and so on.

We are confident that our appeal will be supported by thousands of medical students from other medical institutions of Ukraine.

We require an immediate legal review of the feasibility and legality of the IFOM exam by all instances and ask you to lawfully influence the course of the expertise, and prohibit the IFOM exam as being in conflict with the current legislation of Ukraine!

With a deep sense of respect,

Anastasia Sereda
Denis Ivanchenko
Maria Nellyapina
Asrorov Madamin
Ezekwu Precious
Gulshan Kumar Yadov
Nishant Kumar
Said Fais Ali
Abdulla Raxman
Shubhas Kumar
Rahul Kumar
Amir Khusro
Adil Amim
Nadin Abuxam