Graduate Medical Education Committee (GMEC)-Approved (Non-ACGME Accredited) Programs Policy and Procedure

Scope: All clinical training programs within the UW School of Medicine (UWSOM) that provide postgraduate medical education training in specialties/subspecialties for which accreditation by the Accreditation Council for Graduate Medical Education (ACGME) is either not available or has not been obtained. This includes all non-ACGME-accredited programs in which trainees are appointed as Senior Fellows and/or Senior Fellow Trainees and Acting Instructors.

Background: Within the UWSOM, there are training programs that are not accredited by the ACGME. These programs support the interests of UW Medicine and affiliated hospitals, the patient care needs of the region, and other UW graduate medical education (GME) programs. The goal of this policy is to establish an organizational structure that promotes the educational quality of all UWSOM training programs, complies with regulatory requirements, ensures that new programs do not unduly interfere with existing ACGME accredited programs, and ensures a similar level of institutional support for trainees in these programs as is available for other GME trainees.

Support and oversight for non-ACGME-accredited programs by the UWSOM is further necessitated by the policies of several national organizations:

I. ACGME Requirement: Appointment of Fellows and Other Learners: The presence of other learners (including, but not limited to, residents from other specialties, subspecialty fellows, PhD students, and nurse practitioners) in the program must not interfere with the appointed residents’ education. The program director must report the presence of other learners to the DIO and GMEC in accordance with sponsoring institution guidelines. Common Program Requirement III.D. July 1, 2017.

II. National Resident Matching Program (NRMP) Required Oversight: The National Resident Matching Program (NRMP) Specialties Matching Service includes specialties (a) accredited by the ACGME or another entity deemed acceptable to NRMP, (b) affiliated with an ACGME-accredited program in the primary discipline, or (c) that lead to certification or endorsement and oversight by a board recognized by the American Board of Medical Specialties. The NRMP Institutional Official (UW GME Designated Institutional Official) is further required during the program registration process to attest that a non-ACGME program is under the governance of the institution.

III. Educational Commission for Foreign Medical Graduates (ECFMG) Requirement for Non-Standard Training: The ECFMG defines non-standard training as “advanced clinical subspecialty disciplines or pathways for which there is no Accreditation Council for Graduate Medical Education (ACGME) accreditation and/or American Board of Medical Specialties (ABMS) member board certification available.” Non-ACGME programs appointing foreign nationals requiring J-1 visa sponsorship must meet the following criteria:
   - Demonstrate ABMS member board endorsement for the specific advanced subspecialty discipline. A listing of recognized disciplines is available on the ECFMG website; written board support must be secured for any discipline not listed.
Evidence of the institution’s Graduate Medical Education Committee approval of the advanced training program through submission of a completed GMEC & Parent Program Verification Form. This includes confirming the following: the institution’s current ACGME accreditation status; that all accreditable programs within the sponsoring institution and affiliated participating sites are in good standing with the ACGME; that the non-standard program is directly associated with an ACGME-accredited parent program; that J-1 physicians are prohibited from billing directly for services rendered; and that trainee meets all requirements to enter the training program, including eligibility and credentialing requirements.

Submit the institution’s GMEC-approved program description, following ECFMG-defined requirements.

Definitions:

**Accredited Program:** A residency or fellowship program accredited by the Accreditation Council for Graduate Medical Education (ACGME).

**Non-Accredited Program:** A postgraduate medical education clinical training program within a specialty or sub-specialty for which ACGME accreditation is not available or has not been obtained by the program. Accreditation by a professional organization or accrediting body other than the ACGME is not sufficient to consider the program accredited. Trainees in these programs will generally hold a Senior Fellow title alone or in combination with an Acting Instructor title.

Policy:

All clinical training programs within the UW School of Medicine that provide postgraduate medical education must be accredited by the ACGME or approved by the UW Graduate Medical Education Committee (GMEC).

The UW GMEC is responsible for overseeing the Sponsoring Institution and its ACGME-accredited programs, as well as ensuring the quality of the learning and working environment of these programs. The committee is also responsible for ensuring the educational quality of UWSOM non-accredited training programs, and has appointed a subcommittee to oversee this charge.

**Established Programs:** Non-accredited programs currently offered at the University of Washington must meet the minimum program requirements noted below.

**Applications for New Programs:** Development of new non-accredited fellowship programs will be reviewed by the GMEC upon submission to the committee of a completed Application for GMEC Approval of a Non-ACGME Fellowship Program. The GMEC will not approve requests submitted for new non-accredited programs for which ACGME accreditation is available. These programs must seek accreditation by the ACGME.

**Program Leadership:** All non-ACGME accredited programs must have a designated program director, who will report directly to either the program director of the core ACGME-accredited residency or fellowship program or to the Department Chair or Division Head.

**Stipends:** Non-ACGME fellows should be paid according to the training year in which they are participating in a UW GME training program, and if possible according to the UW Resident/Fellow Stipend Schedule for UWHA Members.

This policy does not affect faculty appointments, hospital privileging, professional fee billing or funding processes for individual trainees participating in such programs.
Governance: GMEC-Approved Fellowship Programs Subcommittee:
The GMEC-Approved Fellowship Programs Subcommittee (GAF) is composed of a core group of GME staff, supported by an advisory board of UWSOM program directors and administrators from both ACGME-accredited and non-ACGME-accredited programs, trainees, and department administrators. The GAF subcommittee meets regularly to ensure ongoing communication between non-ACGME-accredited programs and GME leadership to ensure progress in meeting program goals, which may include:

1. Sharing of Educational and Programmatic Best Practices
   - Recruitment and selection techniques, including confirmation of competency from previous program directors.
   - Orientation for new trainees.
   - Curriculum writing and innovation. The written curriculum must include overall program goals, rotation-specific goals and objectives (if applicable), didactic sessions, nature of supervision, and scholarly activities.
   - Evaluation system, including evaluation of the trainee, faculty, rotations (if applicable), and the program. Trainee evaluations must be designed to eventually document competency to practice in the sub-specialty or specific area of training without direct supervision. Case logs may also be included for procedurally based specialties.
   - Pay structures.
   - Common concerns, resources and solutions available.

2. Ensuring a Program Review Process
   - Maintaining inventory of existing programs, review of new programs, and program closures.
   - Annual updates, validation of expansion plans. This includes impact on other programs and resources available.
   - Assistance with change of status upon availability of ACGME accreditation.
   - An annual program review to include fellow and faculty feedback, collective fellow performance and graduate tracking in order to perpetuate a continuous program improvement process.

Procedures: The UW GMEC and the UW GME Office provide educational support and oversight to these programs in order to support their educational missions and their trainees. The UW GMEC and UW GME Office also strive to ensure the provision of a high quality educational experience comparable to that of ACGME-accredited programs. This includes ensuring compliance with the following program requirements:

- maintain a committed faculty and provide faculty development opportunities
- have clearly defined overall educational goals for the program
- develop and regularly update goals and objectives for each assignment at each educational level
- provide appropriate supervision
- establish and maintain a robust evaluation system of trainees, faculty and the program
- develop appropriate policies, as stipulated below
- track outcomes of graduates
- conduct a regular review of the program, including feedback from trainees and faculty

To support these goals, programs must comply with certain relevant UW GME policies and procedures.
I. Program and Trainee Compliance with UW GME Policies and Procedures:
To ensure high quality educational programming and to provide support to trainees comparable to that of ACGME-accredited programs, non-accredited programs must comply with a variety of UW GME policies and procedures, which are designed to ensure compliance with statutory, ACGME, ABMS, University, UW Medicine or UWSOM policies, rules, and/or regulations. Based on title/s held, these include but may not be limited to (see GME Policies and Procedures page on GME website):
- Assessment and Evaluation Policy
- Drug Enforcement Administration (DEA) Registration Policy
- Graduation Certificate Policy
- Immunization and Health Screening Policy
- Licensing Policy
- Maintenance of Case/Procedure Log Policy
- Moonlighting Policy (Outside Professional Activity)
- New Rotation Site Policy and New Rotation Request Form
- Outside Professional Work Policy
- Physician Impairment Policy
- Professional Behavior and Conduct for the Teacher/Learner Relationship
- Senior Fellow Credentialing Policy
- USMLE and Licensure Examination Policy
- UW Medicine Policy on Professional Conduct
- Vendor Interaction Policy
- GME and UW SOM Visa Policies

Other
- UW Faculty Code
- Documentation, billing and coding compliance training
- HIPAA Compliance Training

II. Educational Agreements: Non-accredited program must maintain Master Affiliation Agreements and Program Letters of Agreement with participating training sites as necessary.

III. Appointment: Appointment of trainees in non-ACGME programs is managed through the Office of Academic Appointments and Compensation (AAC). Programs must inform applicants of accreditation status (i.e., if the program is not accredited) at the time of recruitment.

IV. Credentialing:
- Senior Fellows and Senior Fellow Trainees participating in non-accredited training programs that involve direct patient care and/or indirect patient care activities must be credentialed by the GME Office prior to commencement of training, and prior to reappointment to multi-year programs. Refer to the Senior Fellow/Senior Fellow Trainee Credentialing Policy for detailed requirements.
- Individuals holding dual appointments as Senior Fellows and Senior Fellow Trainees with a concurrent Acting Instructor appointment will be credentialed through the Office of Medical Staff Appointments (OMSA).

V. Orientation: Individuals holding a Senior Fellow and/or Senior Fellow Trainee appointment will be invited to attend UW Medicine Orientation arranged by the GME Office, and scheduled for UW Medicine electronic health record (EHR) training during Orientation. Senior Fellows and Senior Fellow Trainees with a concurrent Acting Instructor appointment must be scheduled by their program to attend MSO Orientation, which includes EHR training.