

**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 not available or has not been obtained. This includes all non-ACGME-accredited programs in which trainees are appointed as Senior Fellows (0445) and/or Senior Fellow Trainees (0442) and Acting Instructors (0124).

Background: Within the UWSOM, there are training programs that are not accredited by the Accreditation Council for Graduate Medical Education (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 UWSOM training programs, complies with regulatory requirements, ensures that new programs do not unduly interfere with existing 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 SOM 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, 2013.*
- II. **National Resident Matching Program (NRMP) Required Oversight:** Per the requirements of the National Resident Matching Program (NRMP) Specialties Matching Service, "*the NRMP Institutional Official must attest to oversight responsibility for non-ACGME-accredited fellowships to indicate that unaccredited programs are under the institution's governance or that an affiliation agreement exists.*"
- III. **Educational Commission for Foreign Medical Graduates (ECFMG) Requirement for Non-Standard Training:** The ECFMG defines non-standard training as "an advanced clinical subspecialty discipline or pathway for which there is no ACGME accreditation and/or ABMS member board certification available." Programs seeking to enroll foreign nationals requiring J-1 visa sponsorship in a non-standard training must meet the following [criteria](#):
 - Demonstrate ABMS member board endorsement for the specific advanced subspecialty discipline.
 - Provide the institution's Graduate Medical Education Committee (GMEC) endorsement for the specific advanced training program.
 - Submit a GMEC-approved [program description](#) (including pre-defined requirements by the ECFMG) on institutional letterhead signed by the program director.

- Confirm that the teaching hospital offering the non-standard training is in full compliance with ACGME institutional requirements and that all the accreditable programs are in good standing with ACGME.
- Verify that J-1 physicians are prohibited from billing directly for services rendered.

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 (UWSOM) that provide postgraduate medical education must be accredited by the ACGME or be approved by the UW Graduate Medical Education Committee (GMEC).

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

New Programs: Development of new non-accredited fellowship programs will be reviewed by the GMEC upon submission of an Application for New Non-ACGME Program proposal to the committee. All proposals must comply with the requirements of the NRMP and ECFMG noted above. Specific requirements for a new program proposal are outlined below. 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: Senior Fellows should be paid according to the training year in which they are participating in a UW GME training program, and according to the UWSOM Stipend Schedule. Departments are highly encouraged to supplement grant-funded trainees' stipends up to levels defined in the UWSOM Stipend Schedule.

This policy does not affect faculty appointment, hospital privileging, professional fee billing or funding processes for individual trainees participating in such programs.

Governance: The UW Graduate Medical Education Committee (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.

GMEC Subcommittee:

This subcommittee is composed of selected UWSOM program directors and administrators from both ACGME-accredited and non-ACGME-accredited programs, and 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**
 - Enrollment documentation, reporting of new programs and closure of inactive ones.
 - 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:

- [Academic & Professional Conduct Policy & Procedure](#)
- Case/Procedure Log Maintenance Policy
- [Drug Enforcement Administration \(DEA\) Registration Policy](#)
- [Evaluation Requirements Policy](#)
- Senior Fellow/Senior Fellow Trainee Exit Process
- [GMEC Approval of Non-Standard Training Programs for J-1 Visa Sponsorship](#)
- [Graduation Certificate Policy](#)
- Grievance Policy and Procedure
- HIPAA Training
- Immunization and Health Screening Policy
- [Licensing Policy](#)
- [Moonlighting Policy \(Outside Professional Activity\)](#)
- New Rotation Site Policy and New Rotation Request Form
- NPI Enrollment
- Outside Professional Work Policy
- [Physician Impairment Policy](#)
- [Professional Behavior and Conduct for the Teacher/Learner Relationship](#) (see *Student Handbook page 61*)
- [Senior Fellow Credentialing Policy](#)
- [USMLE Policy](#)
- [UW Medicine Policy on Professional Conduct](#)
- [Vendor Interaction Policy](#)
- [Violence in the Workplace Policy and Procedure](#)
- [UW, GME](#) and UW SOM Visa Policies
- UW Faculty Code
- Medical staff credentialing and privileging through the Office of Medical Staff Appointments (OMSA)
- License to practice medicine in Washington State
- Practice plan membership
- Documentation, billing and coding 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 Faculty Appointments (OFA). Programs must provide non-ACGME trainees with appropriate contracts, to include the program, training dates, training level, stipend/salary, and confirmation of provision of UW benefits. This is to be signed by the program director and/or chair and the trainee. All other appointment requirements must be coordinated directly with OFA. Programs must also inform applicants of accreditation status (i.e., that the program is not accredited) at the time of recruitment.

IV. Credentialing: Senior Fellows (0445) and Senior Fellow Trainees (0442) participating in non-accredited training programs that involve direct patient care and/or indirect patient care activities must be credentialed by the Graduate Medical Education (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/or Senior Fellow Trainees and Acting Instructors (O124) will be credentialed through the Office of Medical Staff Appointments (OMSA).

- V. Orientation:** Individuals in non-ACGME programs must be scheduled by their program to attend MSO Orientation, which includes EMR training.

New Programs: In order to establish a new postgraduate medical education training program within the UWSOM, GMEC approval must be obtained. The program director must submit a letter to the GMEC requesting GMEC approval and addressing the following program requirements:

1. Identification of a program director and administrator responsible for administration and oversight of the program, and FTE secured to support each of their respective responsibilities.
2. Clear educational rationale, contribution to the educational mission of UW Medicine and affiliates, and regional or national workforce needs.
3. Written curriculum (including overall program goals, rotation-specific goals and objectives (if applicable), didactic curriculum, nature of supervision and scholarly activities), evaluation system, and defined length of training.
4. Block rotation schedule including training sites.
5. Program support, including faculty expertise and availability, departmental resources, adequacy of patient care experiences and case volumes.
6. Is accreditation/recognition/approval available through the AMBS, specialty society, or other entity? If yes, does the program plan to seek approval?
7. Effect of proposed program on already existing accredited and non-accredited training programs, e.g., competition for case volumes.
8. Number of proposed trainees, stipend/salary levels, and appointment type (e.g., Senior Fellow, Senior Fellow Trainee, and/or Acting Instructor).
9. Proposed source of funding of fellow stipend/salary and benefits.
10. Recruitment/application process and expected recruiting pool (quality of applicants, anticipated visa requirements).