POLICY: OVERSIGHT OF NON-ACCREDITED FELLOWSHIPS
Policy Number 14.9
Chapter: Non-accredited Fellowships

Purpose:
To establish the oversight of, as well as asset processes to create and maintain, University of Utah Health advanced subspecialty fellowship programs for which there is currently no Accreditation Council for Graduate Medical Education (ACGME) accreditation or American Board of Medical Specialties (ABMS) member board certification available. Those attracted to these training experiences are often established physicians, mid-career, and already board eligible/certified in a primary specialty.

Definitions:

A. Definition of Non-Standard Training

Those subspecialties or training pathways for which neither ACGME accreditation nor ABMS member board certification is available. The non-standard provision was designed to support advanced training opportunities that have a pre-defined training curriculum and duration. Such programs must be recognized by the respective ABMS-member board and the host institution’s Graduate Medical Education Committee. NOTE: All applications for Education Commission for Foreign Medical Graduates (ECFMG) J-1 Visa sponsorship in non-ACGME accredited programs, including subspecialty fellowships previously certified by an ABMS-member board, are considered “non-standard applications” by the ECFMG and must adhere to the guidelines for non-standard clinical training programs.

1. Non-accredited GME Fellowships: Programs that fall under the auspices of the GMEC, whose trainees are credentialed by the Office of Graduate Medical Education, and that qualify for reduced liability premiums under the Malpractice Fellow Premium Policy, 6.5.
2. Non-accredited Visiting Faculty Fellowships: Programs whose trainees are credentialed by the Medical Staff Office, hired as Visiting Faculty, do not qualify for reduced liability premiums under the Malpractice Fellow Premium Policy, 6.5, and are not governed by this policy. These programs are not under GMEC or the GME office oversight.

B. Current member board recognized non-standard disciplines may be found at https://www.ecfmg.org/evsp/nonstandard-subspecialty-disciplines.html.

C. MedHub: Web-based resident data management system.

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Policy:
A. Maintain the GMEC’s role in oversight of educational programs for all postgraduate clinical training for physicians within the University of Utah Health (UUH) School of Medicine and affiliated institutions.

B. Recognize and accommodate the ability of selected clinical trainees to independently provide clinical services within the scope of their primary specialty certification for each program subject to this policy.

C. Non-accredited GME fellowship programs may allow individual trainees to assume junior faculty status and perform billable services commensurate with those of a faculty member within the scope of their primary discipline, concurrent with their advanced training. The time spent as junior faculty and performing billable services is limited to 20% of their fellowship as per GME and Risk Management Policy. No billing is permitted for services rendered by international medical graduates training on visas sponsored by ECFMG or with other limited visas.

D. Non-accredited programs will be conducted directly by the responsible academic department, but subject to GMEC oversight.

1. Non-accredited fellowship programs must adhere to specific requirements tracked by the GME office. These include:
   a. Execute employment contracts, processed by GME office, prior to hire date. These are administered through MedHub, per Resident Agreement Policy, 1.8.
b. Program Letters of Agreement in place with affiliates prior to start of external rotations.

c. GMEC/GME office must review and approve any changes in training complement, changes in program length or structure, site changes, or appointment of new Program Directors prior to making the change(s), per GME Program Changes Approval Process Policy, 14.2.

d. MedHub utilized for rotation schedules and work hours reporting. Rotation schedules must be entered in MedHub by the 10th of the following month. Work hours must be entered weekly.

e. Inform GME office of trainee employment changes and FMLA/Medical Leave of Absences and other leave prior to the trainee taking the leave.

f. Moonlighting policy established and followed.

g. No more than 1 day/week (or 20% of the trainees time) completing independent work (acting as attending and billing for services), per Malpractice Fellow Premium Policy, 6.5.

h. Adherence to GME Academic Action and Dispute Resolution Policy 12.1.

2. Non-accredited GME fellowships are a minimum of 12 months in length. Fellowships shorter than 12 months will fall under Definition: A.2 (above) as Visiting Faculty Fellowships with Medical Staff Office oversight.

3. The guiding principle for establishing a non-accredited GME fellowship program must be that such a program shall provide an educational experience of comparable quality to other GME programs while in no way interfering with, or detracting from, the training of residents and fellows in other GME programs.

4. While functioning as subspecialty trainees, these physicians are required to be supervised at all times by a qualified member of the medical staff, appointed by the fellowship Director.

5. Each academic department will credential trainees in non-accredited programs as attending medical staff in accordance with UUH School of Medicine Medical Staff Office policies and procedures, as well as GME Policies 5.1, and 6.5, as revised.

E. Matters pertaining to the selection of trainees shall be the responsibility of the academic department, according to applicable School of Medicine and/ or University of Utah Health standards.
F. Trainees in non-accredited programs will receive stipends and benefits corresponding to the schedule established by the GMEC for all residents.

G. Trainees in non-accredited programs will be processed and credentialed by the GME Office in accordance with the Eligibility and Credentialing, Policy, 1.2, the same policies and procedures that apply to trainees in accredited programs.

H. Non-accredited fellowship programs wishing to train foreign medical graduates with J-1 Clinical Visa Sponsorship must adhere to the ECFMG policy regarding Application for J-1 Clinical Visa Sponsorship in Non-Standard Clinical Training Programs. All other visa types must be administered through the Office of General Counsel.

Procedure:

GMEC APPROVAL OF NON-ACCREDITED GME FELLOWSHIP PROGRAMS

A. A New Program Application for use by Non-Accredited fellowships is available in MedHub (Resources/Documents; GMEC Request Applications; Application – New Program). Applications for new non-accredited GME fellowship programs must comply with the GME Program Changes Process Policy, 14.2.

B. Programs seeking GMEC approval must comply with the Resident Agreement Policy, 1.8.

C. If ACGME accreditation is available, all non-accredited fellowships under GME oversight, must seek and obtain accreditation. Non-accredited fellowships, under the oversight of the department (not GME), are not required to obtain ACGME accreditation.