1.0 Purpose

The intent of this policy is to ensure educational quality and institutional support and oversight of all clinical training programs within the Medical College of Georgia (MCG) at Augusta University (AU) 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 and/or Senior Fellow Trainees and Acting Instructors

Within MCG, there are training programs that are not accredited by the Accreditation Council for Graduate Medical Education (ACGME). These programs support the interests of MCG, AU and affiliated hospitals, the patient care needs of the region, and other MCG, AU graduate medical education (GME) programs. The goal of this policy is to establish an organizational structure that promotes the educational quality of MCG, AU 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.

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

2.1 **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 I.E., July 1, 2020.*

2.2 **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*."

2.3 **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:

2.3.1 Demonstrate ABMS member board endorsement for the specific advanced subspecialty discipline.

2.3.2 Provide the institution's Graduate Medical Education Committee (GMEC) endorsement for the specific advanced training program.

2.3.3 Submit a GMEC-approved program description (including pre-defined requirements by the ECFMG) on institutional letterhead signed by the program director.

2.3.4 Confirm that the teaching hospital offering the non-standard training is in full compliance with ACGME institutional requirements and that all the accreditation eligible programs are in good standing with ACGME.

2.3.5 Verify that J-1 physicians are prohibited from billing directly for services rendered.

3.0 Definitions

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

3.2 **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.

4.0 Policy

4.1 All clinical training programs within MCG, AU that provide postgraduate medical education must be accredited by the ACGME or be approved by the MCG, AU Graduate Medical Education Committee (GMEC).

4.1.1 Established Programs: Non-accredited programs currently offered at MCG must meet the minimum program requirements noted below.

4.1.2 New Programs: Development of new non–accredited fellowship programs will be reviewed by the GMEC upon submission of a completed Application for New Non-ACGME Program 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.

4.1.3 Program Leadership: All non-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.

4.1.4 Stipends: Senior Fellows should be paid according to the training year in which they are participating in an AU GME training program, and according to the MCG, AU Stipend Schedule. Departments are highly encouraged to supplement grant-funded trainees' stipends up to levels defined in the MCG, AU Stipend Schedule.

4.1.5 Education Agreement: All non-accredited programs must maintain Program Letters of Agreement for all participating sites to ensure educational oversight.

4.1.6 Billing Requirements: Contact the AU Compliance office to address any questions involving appropriate billing practices.

4.1.7 If ACGME accreditation becomes available for an established non-accredited program, the program must apply for ACGME accreditation within the next fiscal year cycle. Failure to apply for accreditation shall constitute a violation and will require review of the program by GMEC/DIO.

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

5.0 Procedures:

The Medical College of Georgia at Augusta University GMEC and the GME Office provide educational support and oversight to these programs in order to assist their educational missions and their trainees. The MCG, AU GMEC and 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 and submit an Annual Program Evaluation
- Monitor duty hours and ensure that trainees do not exceed 80 hours/week or spend greater than 20% of their time as faculty in their core specialty.

5.1 **Program and Trainee Compliance with AU 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 the MCG, AU GME policies and procedures, which are designed to ensure compliance with statutory, ACGME, ABMS, MCG, AU Health or AU policies, rules, and/or regulations. Based on title/s held, these include but may not be limited to:
https://www.augusta.edu/mcg/residents/hspolicies/

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

5.3 Instructor/Fellows (otherwise considered Faculty) are also subject to the policies and procedures established by AU Medical Staff bylaws pertaining to Faculty.

6.0 New Programs:

In order to establish a new postgraduate medical education training program within MCG / AU, GMEC approval must be obtained. The program director must submit an application to the GMEC requesting GMEC approval and addressing the outlined program requirements and the proposed funding for the Program and present to GMEC. Final approval will be provided by the GME Governing Board.

_____ 7/1/21
David Hess, M.D.   Date
Dean, Medical College of Georgia

_____ 7/1/21
Natasha M. Savage, M.D .   Date
Interim Associate Dean, Graduate Medical Education and DIO