



Clinical and Educational Work Hours Policy

Graduate Medical Education Committee - Policies and Procedures

Purpose

In order to comply with ACGME Institutional and Common Program Requirements, the University of Arizona College of Medicine - Tucson (UACOM-T) Graduate Medical Education Committee (GMEC) sets forth this policy to ensure institutional and program compliance with ACGME clinical and educational work hour requirements and restrictions. The term “Trainee” includes all residents and fellows enrolled in ACGME-accredited and non-standard training (NST) programs.

The ACGME Institutional Requirements (2021) state:

I.B.4.a) GMEC responsibilities must include oversight of the quality of the GME learning and working environment within the Sponsoring Institution, each of its ACGME-accredited programs, and its participating sites; (Outcome)

III.B.5.a).(1) The sponsoring Institution must oversee resident/fellow clinical and educational work hours, consistent with the Common and specialty-/subspecialty specific Program Requirements across all programs, addressing areas of non-compliance in a timely manner; (Core)

IV.K. Clinical and Educational Work Hours: The Sponsoring Institution must maintain a clinical and educational work hour policy that ensures effective oversight of institutional and program-level compliance with ACGME clinical and educational work hour requirements. (Core)

The ACGME Common Program Residency/Fellowship Requirements (2023) state:

VI.B.3. The program director, in partnership with the Sponsoring Institution, must provide a culture of professionalism that supports patient safety and personal responsibility. (Core)

Background and Intent: The accurate reporting of clinical and educational work hours, patient outcomes, and clinical experience data are the responsibility of the program leadership, residents, and faculty.

VI.F.4. Clinical and Educational Work Hour Exceptions

VI.F.4.a) In rare circumstances, after handing off all other responsibilities, a resident, on their own initiative, may elect to remain or return to the clinical site in the following circumstances: to continue to provide care to a single severely ill or unstable patient; to give humanistic attention to the needs of a patient or patient’s family; or to attend unique educational events. (Detail)

VI.F.4.b) These additional hours of care or education must be counted toward the 80-hour weekly limit. (Detail)

VI.F.4.c) A Review Committee may grant rotation-specific exceptions for up to 10 percent or a maximum of 88 clinical and educational work hours to individual programs based on a sound educational rationale.

VI.F.4.c).(1) In preparing a request for an exception, the program director must follow the clinical and

educational work hour exception policy from the ACGME Manual of Policies and Procedures.

**** Currently, the only Review Committee that allows exceptions to the 80-hour weekly limit is the Review Committee for Neurological Surgery.**

Process:

1. Each ACGME-accredited and NST program is required to develop a program-specific clinical and educational work hours policy that describes how each program will monitor and address clinical and educational hours reporting and violations at the program level.
 - a. The GME office will review each ACGME-accredited and NST program's policy annually to ensure compliance with common program residency and fellowship requirements.
2. Clinical and educational work hours are required to be entered by all trainees in the UACOM-T residency management electronic database and reviewed at least biannually by each program's Clinical Competency Committee.
3. At least quarterly, the GME Accreditation Coordinator will generate a clinical and educational work hours report from the electronic database and review for 1) work hours not being reported by the trainees; 2) concerning trends in work hour violations; and 3) any egregious violations of clinical and educational work hour restrictions.
 - a. This report will be provided to the GMEC quarterly to ensure compliance with clinical and educational work hours restrictions.
4. Programs found to be not in compliance with clinical and educational work hour restrictions will be referred for Special Review. The program will be required to develop an action plan to address the violation(s) and the action plan will be reviewed and monitored by the GMEC Special Review Subcommittee.
5. Rotation specific exception requests for a maximum of 10 percent increase in the 80 hour per week work hour limit must be reviewed and formally endorsed by the GMEC. The formal endorsement must be signed by the Designated Institutional Official (DIO) prior to being submitted to the Review Committee. The exception will not be considered fully approved until approved by the Review Committee.

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Additional institutional efforts to monitor clinical and educational work hour violations:

1. The UACOM-T has a current Moonlighting Policy that ensures:
 - a. Trainees are not required to moonlight.
 - b. Trainees must have written permission from their program director to moonlight.
 - c. All ACGME-accredited and NST programs will monitor the effect of moonlighting on the trainee's performance in the program and for adverse effects.
 - d. Program directors and/or the UACOM-T can restrict moonlighting by trainees, and/or withdraw permission to moonlight for any trainees found to have negative effects from moonlighting activities.
 - e. All ACGME-accredited and NST programs are required to have a program-specific moonlighting policy. This policy will outline the program's process for the review, approval, and monitoring of all Moonlighting requests.
2. The UACOM-T Special Review Policy includes clinical and educational work hour violations as one of the criteria used to identify a program to undergo a special review.

3. The UACOM-T Grievance Policy outlines the process trainees should follow to report any ongoing concerns related to their training, including concerns related to clinical and educational work hours. The Grievance Policy is available on the UACOM-T GME website and programs are encouraged to review all institutional and program-specific policies with their trainees annually.

4. As part of our Annual Institutional Review, all ACGME resident and faculty surveys are reviewed. Survey questions related to clinical and educational work hours are specifically evaluated and any concerning trends identified in work hour violations at an institutional level will be addressed with an action and monitoring plan.

5. Program Evaluation Committees are required to include work hour violations as part of their Annual Program Evaluation (APE).

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