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Graduate Medical
Education

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Non-Standard Training (NST) Program Policy

Graduate Medical Education Committee — Policies and Procedures

Definitions:

1. Non-Standard Training (NST) Program: Clinical training for foreign national physicians in advanced subspecialty programs for which there is no Accreditation Council for Graduate Medical Education (ACGME) accreditation or American Board of Medical Specialties (ABMS) Member Board certification.

2. NST Trainee: A physician in an NST program who holds a J-1 visa sponsored by the Educational Commission for Foreign Medical Graduates (ECFMG).

3. Institutional Recognition: An ACGME process for approval of ACGME-accredited Sponsoring Institutions to conduct NST programs. Institutional Recognition is distinct and separate from ACGME accreditation processes.

Purpose:

The ACGME grants a status of “Recognition” to ACGME-accredited Sponsoring Institutions that offer NST Programs and are in substantial compliance with the ACGME Recognition Requirements for Sponsoring Institutions with NST Program for J-1 Visa Sponsorship. The recognized Sponsoring Institution bears the responsibility for each NST program and NST trainee under its auspices, to assess the impact of NST programs on related ACGME-accredited program(s), and for compliance with regulatory requirements for J-1 participants.

In order to comply with these requirements, this policy describes the process for approval and oversight of NST programs at the University of Arizona College of Medicine – Tucson (UACOM-T).

This policy specifically describes the process for NST programs that are required to train J-1 visa holders as described above. This policy does not apply to U.S. medical school graduates or H1B visa holders.

Process:

For New NST Programs:

1. Departments interested in starting a new NST will be provided with:

- 1) the *ACGME Recognition Requirements for Sponsoring Institutions with Non-Standard Training Programs for J-1 Visa Sponsorship*;

- 2) the *ACGME Non-Standard Training (NST) Program Description* form; and
- 3) the required ACGME fees for NST Recognition of the proposed NST program.
 - The ACGME annual fee for any new NST program will be the total cost to the ACGME annually, divided by the number of approved and active NST programs at the UACOM-T. This amount may vary each year, depending on the number of approved and active NST programs.
2. The department will complete the “New Non-Standard Training Program - Initial Request Form” (attached.) This form includes the following information:
 - a. The name of the requested NST program.
 - b. The most closely related ACGME-accredited residency/fellowship program. This program must have a status of Continued Accreditation or Continued Accreditation with Warning (1.1.b.).
 - c. The name of the physician faculty member of the most closely related ACGME-accredited program anticipated to be the program director who will be responsible for the operation of the NST program, and who will oversee the NST trainee supervision, education, and assessment at all participating sites (1.3.).
 - d. Signatures from the Department Chair, Vice Chair of Education (when applicable), program director of the most closely related ACGME-accredited program, and Banner Health Physician Executive (or their designee) to ensure the request aligns with the strategic priorities of UACOM-T and Banner Health, and that funding for the NST trainee is available.
3. The Initial Request Form will be submitted to the GME office for review to ensure the program is eligible to be considered as an NST at our sponsoring institution.
4. Once the Initial Request Form has been reviewed by the GME office and deemed eligible as an NST, the department will be notified to prepare the NST program description for review and approval by the GMEC.
5. The ACGME NST Program Description form will be completed by the department (attached). This form will be used to enter the required NST program information in the ACGME’s Accreditation Data System (ADS.)
 - a. The New Program Application of the most closely related ACGME-specialty/subspecialty program can be used as a guide for the program description. This form can be modified to include the required elements in the Recognition Requirements (included below) that are relevant to the specific NST program.
 - b. The NST program description will include all the required elements described in the Recognition Requirements (1.4.)
 - c. The program description must specify any qualifications for appointment of the NST program director (1.4.a.).
6. At a minimum, the program description must include the ACGME Recognition Requirements related to the NST program, including:
 - a. Appointments (2.1.)

- i. Explanation of the qualifications for appointment of the NST program director (1.4.a.)
- ii. Description of the prerequisite education and/or training for entry into the proposed NST including any specific requirements delineated or recommended by the recognizing body for the specialty. (2.1./2.1.a.)
- iii. Description of the process used by the NST program director to ensure the prerequisite education is met such as a review of:
 - a. the ECGME Certificate;
 - b. a minimum of three letters of recommendation, one of which is from the residency training director;
 - c. a letter of interest to the program.

These application materials must be reviewed by the program director and the NST selection committee to ensure the applicant meets the prerequisite education requirements. Identified applicants must complete all hiring and screening protocols from the employing entity, and onboarding checklists from the GME office prior to their start date in the NST program. (2.1.b.)

b. Curriculum (2.2.)

- i. Educational goals of the NST (2.2.a.)
- ii. Description of required educational experiences, didactic sessions, assessment methods, and procedural requirements (2.2.c.)
- iii. Description of how the curriculum will be made available to NST trainees and faculty (2.2.)

c. Assessment

- i. Initial and Formative Assessment (2.3.)
- ii. Summative Assessment (2.4.)
- iii. Opportunity to Raise Concerns and Provide Feedback (2.5.)
- iv. Clinical and Educational Hours of NST Trainees (2.6.)
- v. Mandatory Time Free of Clinical and Educational Activities (2.7.)

d. Participating Sites (1.5.)

- i. Participating Sites must be limited to those in the most closely related ACGME-accredited program (1.5.)

7. A CV of the requested NST program director must also be submitted to the GMEC for review and approval of the appointment of the requested program director along with the NST program description (1.4.b.)
8. The NST program director and program coordinator/administrator must be provided with protected time to administer the program. The amount of designated FTE for the program director and the program coordinator/administrator should align with the most closely related specialty requirements for protected FTE. The amount of designated FTE that will be provided to the program director and the program coordinator/administrator must be included in the program description.
9. The program description and CV of the requested NST program director must be submitted by March of the preceding academic year that the NST is expected to begin, to ensure enough time for the GMEC to review.
 - a. For programs that utilize a national matching program, the program description must be submitted three (3) months prior to any required quota deadline dates.
10. If the NST program is approved by the GMEC, the department chair, vice chair of education (when applicable), the program director of the most closely related ACGME-accredited program, the new NST program director, and the Banner Health representative will be notified.
11. All NST programs will be required to use New Innovations for onboarding, collecting, and reporting of resident/fellow data, including the tracking of clinical and educational hours.
12. All NST programs will be required to develop a program training manual. This manual will be distributed to the residents/fellows at the time they begin their training and distributed to the faculty annually. The manual will include at a minimum:
 - a. Description of the curriculum including overall competency-based goals and objectives for each year of training
 - b. Rotation schedule and participating sites with a description of each clinical rotation that includes the goals, objectives and resident responsibilities for each rotation that meet the overall goals of the program
 - c. Description and expectations for any additional required research experiences, educational experiences, and/or didactics that meet the overall goals of the program
 - d. Description of the evaluation and assessment methods used by the program
 - e. Expectation and frequency for formative and summative feedback
 - f. Limitations on clinical and educational work hours, and the program's method for tracking and monitoring duty hours, and duty hour violations
 - g. Description of the processes and resources for residents/fellows to raise concerns and provide confidential feedback without fear of retribution or retaliation
 - h. Copy of the written agreement including all the required elements and relevant policies
13. All written agreements with NST residents/fellows will be signed and uploaded to New Innovations.

14. NST programs are required to submit documentation to the GMEC for review annually. This data will include a review of the supervision and assessment of the NST trainees (1.4.c.), and the impact of the NST program on UACOM-T ACGME-accredited programs (1.4.d.).

15. The GMEC will review and approve NST program data annually.

16. If the GMEC does not approve the annual report of the NST program, the DIO and/or GMEC chair will meet with the NST program director to correct the concern. In addition to the NST program director, the department chair and/or vice chair of education may also be included in any remediation plans as needed.

17. If reasonable attempts to correct concerns raised by the GMEC are not successful, or if the NST program is found to be substantially out of compliance with the ACGME Recognition Requirements, the GMEC may revoke its approval of the NST program.

18. An NST program removed by the GMEC as an approved program can be resubmitted by the department to GMEC for consideration at any time in the future.

19. Once approved by the GMEC, the NST program coordinator/administrator will enter the approved NST program description in ADS by the deadline required.

20. The GME office will alert the UACOM-T and the department finance offices that the NST program has been approved by GMEC. The department will work directly with the UACOM-T finance office for payment of the ACGME fee.

21. The GME office will ensure that all processes and regulations that govern the participation of sponsors in the Exchange Visitor Program of the United States Department of State are followed (1.1.c.).

22. Once approved by the GMEC, the program will ensure the program's website is updated to reflect the institution's recognition of the NST program for J1 visa holders.

23. In an academic year in which a recognized NST program does not have a J-1 visa holder enrolled, the NST program will be placed in "INACTIVE" status. When a program is in "INACTIVE" status, the department is not responsible for the annual ACGME fees for that year.

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