



THE UNIVERSITY OF ARIZONA
COLLEGE OF MEDICINE TUCSON

Graduate Medical
Education

1501 N. Campbell Avenue, Rm 2445
P.O. Box 245085
Tucson, AZ 85724-5085
Tel: (520) 626-7878
www.gme.medicine.arizona.edu

Non-Standard Training Program Policy

Purpose:

Recognition of Sponsoring Institutions with Non-Standard Training (NST) programs by the ACGME provides a framework for approval and oversight of training opportunities in the United States for physicians whose J-1 visas are sponsored by the ECFMG through the Exchange Visitor Program of the United States Department of State.

The ACGME recognizes ACGME-accredited Sponsoring Institutions that offer NST Programs and that demonstrate substantial compliance with the ACGME Recognition Requirements.

The recognized Sponsoring Institution bears the responsibility for each NST program and NST trainee under its auspices, for assessment of the impact of NST programs on related ACGME-accredited program(s), and for compliance with regulatory requirements for J-1 participants.

In compliance with the ACGME Requirements for "Recognition for Sponsoring Institutions with Non-Standard Training Programs for J-1 Visa Sponsorship" (ACGME; July 1, 2025), 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 does not apply to U.S. medical school graduates or H1B visa holders.

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.

Process:

To Request A New NST Program:

1. Departments interested in starting a new NST program will contact the GME office to begin the process. The department will be provided with the following (available on the ACGME website)

<https://www.acgme.org/programs-and-institutions/institutions/non-standard-training-nst-recognition/>

a. *The ACGME Recognition Requirements for Sponsoring Institutions with Non-Standard Training Programs for J-1 Visa Sponsorship; 2025*

b. *The ACGME Non-Standard Training (NST) Program Description form*

c. *The current required ACGME fees of the proposed NST program*

- The department is responsible for paying the annual fee for NST Recognition divided by the number of active NST programs at the UACOM-T. This amount may vary each year, depending on the number of active NST programs.

2. The department will complete the “**New Non-Standard Training (NST) Program - Initial Request Form**” (attached) and will submit it to the GME office for review to ensure the NST is eligible for to be considered as an NST.

Approval process for a new NST program that requires funding:

1. The steps for requesting a new NST program that requires funding approval are outlined in Addendum A. *BUMG-T GME New Program or Existing Complement Change Approval Process.*”

GMEC Approval Of New NST Program:

1. Once verification of funding has been received, the department will be notified to complete the **ACGME NST Program Description form** and **other required documents** and submit them to the GME office for review and approval by GMEC.
 - The ACGME Recognition Requirements document should be used to accurately complete the program description, and the other required documents necessary for GMEC approval.
 - The Recognition Requirements should be read carefully; delays in GMEC and ACGME approval of the NST may occur if the Recognition Requirements are not followed.
2. An NST program director must be appointed from the faculty of the most closely related ACGME-accredited program.
 - The NST program director, program coordinator, and any required core faculty must be provided with protected time to administer the program.
 - The required FTE for these individuals must align with the most closely related ACGME-accredited specialty/subspecialty requirements for the minimum FTE for these positions.
3. A **CV of the proposed NST program director** must be submitted to the GMEC for review and approval along with the NST program description.
 - The program description and CV *must be submitted by March prior to the start of the academic year* in which the NST program is expected to begin, to allow enough time for the GMEC and ACGME to review prior to the ECFMG deadline of June 30th.
 - For programs that utilize a national matching program, the program description *must be submitted three (3) months prior to any required quota deadline dates.*
4. Once the NST and the NST program director are approved by GMEC, the GME office will add the NST program to the institutional ADS.
5. The department will be notified to update the NST ADS (with the participating site(s), faculty, trainee information, etc) and to upload the program description form in ADS for DIO review and approval.
6. After DIO approval, the NST ADS and program description will be forwarded for review and approval by the ACGME. Once approved by the ACGME, the ACGME will forward the program description to Intealth (ECFMG.)
7. Once approved by the GMEC, the program will ensure the department’s website is updated to reflect the institution’s recognition of the NST program for J1 visa holders.
8. 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.

Approved NST Programs:

1. NST programs are required to use *New Innovations* for onboarding, collecting, and reporting of trainee data, including the tracking of clinical and educational hours.

2. NST programs are 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.

At a minimum, the manual will include:

- Description of the curriculum including overall competency-based goals and objectives for each year of training
- 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
- Description and expectations for any additional required research experiences, educational experiences, and/or didactics that meet the overall goals of the program
- Description of the evaluation and assessment methods used by the program
- Expectation and frequency for formative and summative feedback
- Required Policies including:
 - Program-Specific Supervision Policy
 - Clinical and Educational Work Hours Policy
 - UACOM-T Grievance Policy
 - UACOM-T Due Process Guidelines for Residents and Fellows
- Written agreement including all the required elements and relevant policies

3. NST programs are required to submit documentation to the GMEC for review annually. This data will include:

- Review of the supervision and assessment of the NST trainees
- The impact of the NST program on UACOM-T ACGME-accredited programs

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

5. 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. The department chair and/or vice chair of education may also be included in any remediation plans as needed.

6. If reasonable attempts to correct concerns 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.

7. 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.

8. In an academic year in which a recognized NST program does not have an approved NST trainee 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.

9. An NST program that wants to request a change in the approved trainee complement will complete the "Non-Standard Training (NST) Program Request for Complement Change Form".

- All requests for a change in complement must be reviewed and approved by the GMEC.
- GMEC approval is required prior to offering a position to a potential candidate.

Guidance For Completing the ACGME NST Program Description Form:

1. The ACGME Recognition Requirements should be followed closely to accurately complete the program description form and the other required documents.

These elements include:

(1.3/1.4) NST program director

- Must be a single program director from the physician faculty members of the most closely related ACGME-accredited residency/fellowship program
- Must specify any qualifications for appointment as the NST program director

(1.5) Participating sites in ADS

- Must be limited to participating sites of the most closely related -ACGME-accredited program
- **Rotation schedule**

(2.1) Appointment to the program

- Define the prerequisite training requirements including any specific requirements delineated or recommended by the recognizing body for the specialty
- Description of how the program will ensure NST trainees appointed to the program meet the defined prerequisites. At a minimum, this will include:
 - the ECGME Certificate;
 - a minimum of three letters of recommendation, one of which is from the residency training director;
 - a letter of interest to the program
- 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.
- Must provide an outline of the NST trainee **written agreement** including terms/conditions of the appointment including:
 - Trainee responsibilities and requirements for successful completion of the NST program
 - Duration of training
 - Financial arrangements related to the NST trainee
 - A copy of **the UACOM-T Grievance Policy and the Resident/Fellow Due Process Guidelines**
 - Professional liability coverage, including summary of pertinent information regarding coverage
 - Health insurance benefits for NST trainees and eligible dependents
 - A copy of the UACOM-T Vacation and Leave(s) of Absence Policy including medical, parental, and caregiver leave(s) of absence.

(2.2.) Curriculum

- Description of how curriculum will be made available to NST trainees and faculty
- Overall competency-based goals and objectives
- Delineation of trainee responsibilities
- Description of the required educational experiences, didactics, assessment methods and procedural experiences

(2.3.) Initial and Formative Assessment

- NST program director must complete an initial competence assessment, including a **Milestones assessment** from most closely ACGME-accredited specialty/subspecialty
- Supervising faculty must be physically present to supervise NST trainee with all patients until the NST program director has documented ACGME Milestones achievement for delegating progressive authority

- Program must have a **Supervision Policy** that describes how the program director and faculty delegate progressive authority and responsibility and conditional independence.
- For trainees in NST programs longer than one year, must have semi-annual evaluation

(2.4) Summative Assessment

- Each trainee must receive a **summative (final) evaluation**

(2.5) Opportunity to Raise Concerns and Provide Feedback

- Program must have a policy describing how trainees can raise concerns and provide feedback confidentially
- Policy should include the **UACOM-T Grievance Policy**

(2.6) Clinical and Educational Hours

- Program must have a **Clinical and Educational Hours Policy** describing required limits to work hours, and how work hours are monitored and how violations are managed

(2.7) Mandatory Time Free of Clinical and Educational Activities

- Program must have a **Clinical and Educational Hours Policy** describing mandatory time away, and how monitored and how violations are managed

2. The New Program Application of the most closely related ACGME-specialty/subspecialty program can also be used as an additional tool to complete the NST program description.

NOTE: Items in BOLD are required to be submitted to GMEC ALL TOGETHER for review and approval.

- **Initial NST Program Request Form**
- **Program Description**
- **Proposed NST Program Director CV**
- **Resident Written Agreement**
- **Rotation Schedule**
- **Clinical and Educational Work Hours Policy**
- **Program-Specific Supervision Policy**
- **UACOM-T Grievance Policy**
- **UACOM-T Due Process Guidelines for Residents/Fellows**
- **Milestone-based Trainee Evaluation Form(s)**
- **Final Evaluation Form**

Policy created: October 21, 2022, approved by GMEC June 9, 2023

Revised July 2023, approved by GMEC August 2023

Revised April 2024

Revised formatting, Jul 2025, approved by GMEC 08/01/2025

Updated April, 2026; GMEC Approved 5/1/2026

Addendum A. BUMG—T GME New Program or Existing Complement Change Approval Process

Step 1: Initial Program Request Submission

A. Department/Program initiates contact with GME Leadership:

1. Department/Program approaches the GME Leadership (Drs. Kathy Smith and Conrad Clemens) with interest in a new program or complement increase
2. GME office conducts an initial high-level review to ensure it is a reasonable request
 - a. For any concerns related to the request, Drs. Clemens and Smith will meet with departmental leadership to discuss concerns prior to completing next steps
3. GME office discusses the process and timeline with the department

B. Program completes required GME forms with signatures:

1. Program completes initial GME form, “New NST Program - Initial Request Form” with required signatures (anticipated Program Director, Core Residency Program Director when applicable, and Department Head):

C. Program prepares supporting documentation:

1. **SBAR** detailing educational, operational, and financial impact. Questions to consider:
 - a. **Educational benefit:**
 - i. What is the educational value of this program?
 - b. **Dedicated Research Time:**
 - i. Does the program being presented require dedicated research months? For example, some programs mandate 12 months of dedicated research time beginning in the first year of the program.
 - ii. How will the required block diagram incorporate this research time throughout the training program years? For instance, in a 3-year program, each academic year would include 4 months of dedicated research time, reducing clinical activity accordingly.
 - c. **Operational Impact:**
 - i. Impact on clinic or inpatient workflow
 - ii. Any additional accommodations needed from the hospital?
 - iii. How does it improve patient care/LOS/throughput?
 - iv. Will having fellows reduce our dependence on APPs or other staff?

BUMG—T GME New Program or Existing Complement Change Approval Process

- v. Will fellow(s) take call, restricted vs. unrestricted?
- vi. Will our market possibly be able to hire graduates based on volume/demand projections?
- vii. What is our record in keeping our own graduates?

d. **Financial impact:**

- i. How will productivity or coverage be impacted by FTE reduction by the program director?
- ii. What is the current volume and projection for growth?

2. **Proforma** (use the *GME Complement Increase Pro Forma.xlsx* format):

- a. Proforma must include input from Andy Wegman from Medicaid/Medicare office
 - i. Include acknowledgement that if federal/state funding to GME stops, the program can finish out the current classes, but not matriculate new class
 - ii. Include communication confirmation from Andy Wegman in the form on an email snippet, etc.
 - iii. Currently new programs receive both Medicaid and Medicare funding. Program expansions only receive Medicaid funding.

D. Program Submits to GME Office:

- 1. All documents (GME forms, SBAR, and proforma) are submitted together to GME Office to avoid parallel streams of information
- 2. The GME office will review the forms for completion and accuracy, and ensure they reflect the current ACGME program-specific requirements
- 3. GME office submits completed program documents to Phyllis Michaels and Ericka Moore
- 4. **Timeline: Variable, 1 week after documents are received from the GME office.**

Step 2: BUMG-T Finance Review

A. Phyllis/Ericka will send proforma to Finance

B. Finance reviews and approves proforma to ensure financial viability

C. Finance sends approved proforma to Dr. Andy Tang and Tawnya Tretschok, cc Ericka Moore

BUMG—T GME New Program or Existing Complement Change Approval Process

- D. *Timeline: 2 weeks, pending prompt response from the Department on follow-up questions from the Finance team.***

Step 3: BUMG-T Leadership Review

- A. Dr. Andrew Tang reviews all submitted materials**
- B. *Timeline: 2 weeks***

Step 4: Senior Banner Leadership Review

- A. Dr. Tang submits approved request to Dr. Benjamin Schwartz and Kat Berry**
- B. Request will be presented at an upcoming GME meeting comprised of core leaders: Drs. Schwartz, Tang, Bessell, and Tawnya Tretschok, Jessica Graham. Requesting program and department leadership will also be invited to present; be succinct and brief in your presentation. Recommended areas to highlight are key elements of the program and need. *Plan for 10 minutes to present, max.***
- C. *Timeline: 3 weeks, GME meeting occurs monthly***

Step 5: Banner Written Approval

- A. Banner sends written approval to GME office, Department, and local BUMG leadership**
- B. *Timeline: 1 to 2 weeks***

Step 6: GMEC Review and Approval

- A. GME office works with the program to bring request to GMEC (Graduate Medical Education Committee)**
- B. GMEC review focuses predominantly on educational merits of the request**
- C. GMEC provides approval or denial**
- D. *Timeline: Variable (dependent on GMEC meeting schedule)***

Step 7: ACGME Submission

- A. If approved by GMEC, the application/request is sent to the appropriate Review Committee of the ACGME for final approval**
- B. *Timeline: Variable (dependent on ACGME review cycle)***

BUMG—T GME New Program or Existing Complement Change Approval Process

Total Estimated Timeline Summary

Step Process Component		Timeline	Cumulative Time
1	Initial Program Request & Document Preparation	Variable	Variable
2	BUMG-T Finance Review	~2 weeks	~2 weeks
3	BUMG-T Leadership Review	2 weeks	~4 weeks
4	Senior Banner Leadership Review	3 weeks	~7 weeks
5	Banner Written Approval	~2 week	~9 weeks
6	GMEC Review and Approval	Variable	Variable
7	ACGME Submission	Variable	Variable

Note: The Banner leadership review and approval process requires a minimum of **approximately 9 weeks** from finance review through final written approval. Programs should plan accordingly in consideration of ACGME deadlines and GMEC meeting schedules.



NON-STANDARD TRAINING (NST) PROGRAM REQUEST FOR COMPLEMENT CHANGE FORM

Program: _____

NST Program Director: _____

Please answer the following:

1. What is the current approved complement for the program?
2. What is the requested increase in the number of trainee(s)?
3. Is this a temporary or a permanent change request?
4. What is the NST program's approved most closely related ACGME-accredited program?
5. What will be the impact, both clinically and educationally, of this change on the current ACGME-accredited programs?
6. Does the NST program have enough clinical cases and required educational experiences to support an increase in complement?
7. Does the NST program have sufficient teaching faculty to ensure adequate supervision (as described in the approved program description) to support an increase in complement?
8. Has the request been discussed with the NST program's teaching faculty to ensure they agree with the requested change?

9. Does the NST program participate in the NRMP Match, or any other Match program?

9 a . If so, what is the quota change deadline for the NST program's participation in the Match?

10. What are the current approved FTE requirements for the Program Director (PD) and Program Coordinator (PC) at the current complement?

10a. Will the complement change require an increase in FTE to effectively oversee the NST program?

11. Please attach an updated block diagram that reflects the proposed schedule for the requested change in complement.

NST Program Director Name

NST Program Director Signature

Most Closely Related ACGME Program PD Name

Most Closely Related ACGME Program Signature

Department Chair Name

Department Chair Signature

Banner UMG-Tucson Physician Executive Name

Banner UMG-Tucson Physician Executive Signature

Date Submitted: _____