**POLICY ON RESIDENT DUTY HOURS**

UNIVERSITY OF LOUISVILLE SCHOOL OF MEDICINE

GRADUATE MEDICAL EDUCATION PROGRAM

PART I

The Accreditation Council on Graduate Medical Education (ACGME) has charged sponsoring institutions, in this case the University of Louisville School of Medicine, with ensuring that formal written policies governing resident duty hours be established at both the institutional and program level.

1. Each sponsored training program at the U of L School of Medicine must have a formal, written policy on resident duty hours. The written policy must be provided to all residents and faculty. The policy must foster resident education, facilitate patient care, and be consistent with the current published institutional and program requirements of the specialties and subspecialties that apply to each program. The policy must cover all institutions to which residents rotate. In the event an individual RRC publishes standards which differ from those stated in this policy, the program should follow its published RRC standards.

2. Resident duty hours must not exceed 80 hours per week averaged over four weeks which is inclusive of all in-house call activities and all moonlighting. Duty hours are defined as all clinical and academic activities related to the residency program, i.e., patient care (both inpatient and outpatient), administrative duties related to patient care, the provision for transfer of patient care, time spent in-house during call activities, and scheduled academic activities such as conferences.

3. PGY-1 residents should have 10 hours, and must have eight hours off for rest and personal activities between duty periods. Intermediate level residents should have 10 hours free of duty and must have eight hours between scheduled duty periods. Residents in their final years must have 8 hours free of duty between scheduled duty periods. All residents must have 14 hours off duty following a 24 hour call. Residents in the final years of education (as defined by the Review Committee) should have eight hours free of duty between scheduled duty periods, but there may be circumstances (as defined by the Review Committee) when these residents must stay on duty to care for their patients or return to the hospital with fewer than eight hours free of duty. This should be monitored by the Program Director.

4. In-house call must occur no more frequently than every third night, averaged over a four-week period. Residents must not be scheduled for more than six consecutive nights of night float responsibility.

5. Duty periods of PGY-1 residents must not exceed 16 hours duration. Resident assignments at the PGY 2 level and above must not exceed 24 hours maximum continuous on-site duty with up to 4 additional hours permitted for patient transfer and other activities defined in RRC requirements. There must be no new patients assigned after 24 hours of continuous duty. In unusual circumstances, residents, on their own initiative, may remain beyond their scheduled period of duty to continue to provide care to a single patient. This should be justified by needed continuity of care in a critically ill patient, academic importance of an event or humanistic attention to the needs of a patient or family. The resident must hand over care of all other patients to the team responsible for continuity of care and then document the reasons for remaining. This documentation should be submitted to the Program Director for every instance of overage. The Program Director must review each submission of additional service and track both individual resident and program-wide episodes.

6. Resident time spent in the hospital during at-home call must be counted toward the 80 hours. At-home call, defined as call taken from outside the assigned institution by pager or phone, is not subject to the every 3rd night limitation. However, at-home call must not be so frequent as to preclude rest and reasonable personal time for residents.

7. Program Directors must ensure that moonlighting does not interfere with the ability of the resident to achieve the goals and objectives of the educational program. Resident moonlighting must be approved in advance and monitored by the program director. Programs must implement mechanisms to monitor resident moonlighting to ensure compliance with both program and institutional policies. All moonlighting that occurs both within the residency program and/or the sponsoring institution or outside the sponsoring institution must be counted toward the 80-hour weekly limit on duty hours. PGY-1 residents are not permitted to moonlight.

8. All residents, including those assigned at-home call, must be provided with 1 day in 7 free from all educational and clinical responsibilities, averaged over a four-week period, inclusive of call. One day is defined as one continuous 24-hour period free from all clinical, educational, and administrative activities. At home call cannot be assigned on these days.

9. Residents are required to enter hours weekly in the New Innovations system. Duty hours must be monitored by the program to assure compliance with ACGME requirements. Institutional mechanisms for monitoring duty hours will include the internal review process and review of weekly duty hours entered by the residents in NI. Further oversight at the institutional level will be provided by the Committee for Resident Education and Work Environment which is a sub-committee of the GMEC. Part III of this policy addresses the role of the committee.

10. Program Directors must monitor resident stress and fatigue and develop policies for educating faculty and residents to recognize the signs of stress and fatigue and for dealing with residents identified as stressed or fatigued.

11. Residents must at all times have appropriate support and supervision in accordance with current published ACGME institutional and program requirements and with the School of Medicine GME Policy on Resident Supervision. Programs must ensure that residents are provided appropriate back-up support when patient care responsibilities are particularly difficult or prolonged. Each program must have a process to ensure continuity of patient care in the event that a resident may be unable to perform his/her patient care duties.

12. The Graduate Medical Education Committee is responsible for and has established procedures for reviewing requests for exceptions to the weekly duty hours limits of up to 10 percent or a maximum of 88 hours. Requests must be justified on educational grounds and must be approved by the GMEC before consideration by the appropriate Residency Review Committee.

13. The GME Office will conduct quarterly time audits (August, November, February, and May) in order to provide our teaching hospitals the duty hours documentation required for Medicare reimbursement.

PART II - ACADEMIC PROBATION FOR FAILURE TO LOG DUTY HOURS

All residents/fellows who sign contracts through the GME Office are required to enter their duty hours in the New Innovations (NI) system weekly. Residents/fellows who are found in violation of this requirement will be recommended for academic probation. The process for this recommendation is as follows:

1. The GME Office will generate an“ hours logged” report for each program the first week of each month that will show which residents/fellows have not logged hours for the previous month (i.e., a report of residents/fellows who have not logged hours for December will be run the first week of January).
2. These reports will be faxed to the appropriate Program Directors by the 10th of each month. Program Directors or Coordinators are responsible for notifying the residents of the impending probationary action.
3. Once the reports are distributed, residents will be given until the 15th to enter the missing hours. The GME Office will provide the appropriate Program Directors with an updated report at the monthly GMEC meeting.
4. If the resident/fellow has not entered the missing hours by the last day of the month, it will be recommended to the Dean that the resident/fellow be placed on academic probation. A copy of the recommendation will be forwarded to the resident/fellow and the Program Director.
5. Once placed on probation, the resident will be given an additional 7 days to complete the appropriate duty hour entries. If not entered by the end of 7 days, a recommendation for suspension from program activities and payroll will be forwarded to the Dean.
6. Please contact the GME Office if you have any questions or concerns regarding this policy or duty hour entry in NI.

PART III - PROTOCOL FOR ADDRESSING DUTY HOUR VIOLATIONS

The GMEC Subcommittee titled the Resident Educational and Work Environment Subcommittee will meet every other month and as needed. Duty hour or educational environmental concerns will be brought to and addressed by the committee through the following channels:

1. There will be an administrative staff member of the GME office dedicated to duty hour monitoring. The Educational Environment Administrative Assistant (AA) will monitor duty hour exceptions across all programs and report to the Assistant Dean for Oversight of Resident Educational Environment, as well as to the GMEC Subcommittee. This AA will report areas where persistent problems are noted in order for the committee to work with Program Directors, Departments or others to facilitate solutions.
2. The position of Oversight of Resident Educational Environment Officer is an Assistant Dean position within the GME. He/she will receive weekly reports from the Educational Environment AA regarding duty hour exceptions and help identify areas of difficulty within programs. The Oversight of Resident Educational Environment Officer will liaise with the appropriate Program Directors to address system issues interfering with duty hour compliance. The Oversight of Resident Educational Environment Officer will be an ad-hoc member on the GMEC Subcommittee. This position will have the support of the Associate Dean of Graduate Medical Education as well as the Dean of the Medical School.
3. The Oversight of Resident Educational Environment Officer will also serve as the Faculty Duty Hours Ombudsman. Residents can raise duty hour concerns with the Ombudsman anonymously and without fear of intimidation or retaliation.
4. In addition, there will be two peer-elected Resident Ombudsmen, who will sit on the GMEC Subcommittee to provide a further option for residents to raise concerns anonymously. They will be elected by the Resident House Staff Council from a group of volunteers. They must be from separate programs. It is recommended that they be from programs with little shared faculty or rotations.
5. The GMEC Subcommittee will report to the Associate Dean for Graduate Medical Education as well as the GMEC.
6. In the event that recurrent duty hour violations within a program cannot be resolved through the efforts of the Program Director and Oversight of Resident Educational Environment Officer, the GMEC Subcommittee will meet to investigate and address problems with the support of the Associate Dean for Graduate Medical Education.

1. In addition to monitoring duty hour compliance, the GMEC subcommittee will also monitor resident work environment by reviewing each program’s Annual Resident Survey (ARS) from the ACGME and each program’s Annual Program Review (APR). An aggregate report of the results of both the survey and the APR will be submitted to the Subcommittee. The survey information will be compared to the University as a whole as well as the specialty national aggregate data and the overall national aggregate data. The APR will be reviewed for all of the required components as well as the responsiveness of the program to key issues that were noted by residents and faculty. Each program will be required to create an action plan within the report. The Oversight of Resident Educational Environment Officer and the GMEC subcommittee will monitor progress in completion of the action plans. If needed, they will provide support and advocacy on behalf of the residents and/or program director as they work toward achieving appropriate service-education balance and creating a welcoming educational milieu.

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