

Creighton University School of Medicine-Phoenix Policies

POLICY:	Clinical and Education Work Hours
GOVERNING BODY:	Graduate Medical Education Committee – Creighton University School of Medicine-Phoenix
GMEC APPROVAL DATE:	August 7, 2023; February 6, 2023
REVISED DATE:	February 6, 2023
ACGME ACCREDITATION STANDARD REFERENCE:	Institutional Requirement: IV.K. Clinical and Educational Work Hours -

PURPOSE

Graduate Medical Education training programs must design an effective program structure that is configured to provide House Staff Physicians (HSP) with educational and clinical experience opportunities, as well as reasonable opportunities for rest and personal well-being. This structure is facilitated by following Accreditation Council for Graduate Medical Education (ACGME) clinical and educational work hour regulations.

SCOPE

The policy applies to all Creighton University School of Medicine - Phoenix (CUSOM-PHX) HSP and their respective training programs, that are ACGME accredited or meet the criteria in the Non-ACGME Accredited Program Policy.

DEFINITIONS

- **Clinical and Educational Work Hours:** inclusive of:
 - All in-house clinical and educational activities.
 - Clinical work done from home.
 - All moonlighting or volunteering in the capacity as a physician.Clinical and Educational Work Hours do not include educational activities– (e.g., preparing for a case or didactic presentation, research, or studying done at home).
- **Moonlighting/Volunteer Work:** Moonlighting is defined as any voluntary or paid activity, not related to program training requirements, in which an individual performs duties as a physician. The hours spent moonlighting are counted towards the 80 hours worked for the week. No other work hour requirements apply; however, these outside activities must not interfere with the ability of the HSP's fitness for work nor compromise patient safety and must be pre-approved by the program director with appropriate documentation in the HSP file.

PGY1 HSP and J1 Visa holders are ineligible for moonlighting and volunteering.

POLICY

The Graduate Medical Education Committee (GMEC) must ensure all programs follow the clinical and educational work hour regulations established by the ACGME in the Common Program Requirements. Further details that each ACGME Review Committees specify must also be followed by the respective program. Each program will have written policies and procedures consistent with the Institutional and Program Requirements for HSP work hours and the working environment. These policies will be made available to the HSPs and the faculty.

Program Director Responsibilities

- Program directors should ensure HSPs function in an environment that has safe patient care and a sense of HSP well-being. Programs should have a schedule that is structured so HSPs are able to complete most work on site during scheduled clinical work hours without requiring them to complete clinical responsibilities at home (e.g., documentation).
- Each program can determine frequency of logging work hours, with a minimum of once-a-month logging required.
- Each program director will be responsible for monitoring and obtaining data on compliance with the Work Hours and Supervision Policy for their programs through New Innovations and approve/comment on 80-hour violations. Repeated violations should lead to restructure of the affected rotation or suspension of moonlighting/volunteer work (if applicable).
- All schedules must follow the ACGME clinical and educational work hour regulations. If the corresponding specialty review committee allows exceptions, it is important to note that a HSP may remain or return only if the decision is made voluntarily. HSPs must not be scheduled beyond work period restrictions or required to stay by an attending or more senior HSP.

HSP Responsibilities

- HSPs are required to document their work hours in New Innovations. Each HSP will be responsible for providing accurate and timely data on compliance with the Work Hours and Supervision Policy to their program director, GME office, and the ACGME when this information is requested.
 - In the case of an 80-hour work hour violation, the HSP must document why there was a violation. The program director will then review and document on that violation.
 - Failure to log accurate work hours will be interpreted as unprofessional behavior and a violation of institutional requirements. Failure to comply with work hour logging will result in disciplinary action, outlined herein.
 - Failure to complete the work hours by the 7th day of each month for the hours in the previous month, will result in the following:
 - 1st offense in an academic year–
 - HSP responsibilities: meeting will occur with the program director wherein failure to comply with the work hour policy will be attested by signature of the HSP and program director. The HSP will have 3 days from the time of this attestation to complete their logging. If, after the 3-day period, the work hours are not completed, the hours will be considered incomplete resulting in progression to 2nd Offense.
 - Program responsibilities: the attestation of the meeting with HSP and signature of program director and HSP will be sent to GME Office as confirmation of meeting.
 - 2nd Offense in the same academic year–
 - HSP: institutional warning from GME Office with documentation in the HSP file and “Under Review” status implemented by the CCC, and performance of an administrative project determined by the CCC/program director.

- Program: possible institutional sanction if problem persists and pervasive. Example of sanction could be loss of stipend eligibility for conferences.
- 3rd Offense in the same academic year–
 - HSP: forfeiture of elective block rotation, program stipend for attendance at a national conference, and potential probation and/or possible dismissal from the program.
 - Program: institutional sanction if problem persists or pervasive. Sanction could be loss of stipend eligibility for all HSP conferences.

Programs have the right to add additional consequences as needed to ensure compliance. HSPs should report a pattern of excessive workhours and/or clinical workload to their program director and/or Department Chair. If appropriate changes in the program or individual trainee's schedules are not implemented on a timely basis, trainees should so inform the Designated Institutional Official (DIO).

Institutional Oversight

- The GMEC and GME office will monitor compliance with work hour standards. The GME office will collect work hour logging reports monthly. GMEC will review work hours at each meeting. Non-compliant programs will be monitored and placed on under Special Review when deemed appropriate, following the Special Review Policy.
- Each program's work hours are reported monthly to the GMEC. If a program has an 80-hour violation, they are required to report to GMEC the reasons leading up to the violation and a written action plan as to how they intend to remedy the situation. The GMEC will vote on whether to accept the report and action plan.
- If a program has less than 100% compliance for their HSP logging work hours for 3 consecutive months the program director must report to the GMEC as to how they are going to remedy the situation. The GMEC can offer suggestions to the program director as to how to improve the logging. Further violations for these programs may result in them being placed under Special Review.

REFERENCES:

Creighton University School of Medicine-Phoenix Clinical Education and Work Hours Procedure

AMENDMENTS OR TERMINATION OF THIS POLICY

This policy supersedes all program level policies regarding this area/topic. In the event of any discrepancies between program policies and this GME policy, this GME institutional policy shall govern.

Creighton University reserves the right to modify, amend, or terminate this policy at any time.