Processes for Fellows in Non-ACGME Programs

Policy 2.1.13. The University of Texas Health Science Center at San Antonio takes seriously its responsibility to provide effective oversight of medical education and training in its graduate medical education (GME) programs. Those fellowship programs which are ACGME accredited are overseen, in accordance with ACGME Institutional Requirements, by the GME Committee as are Podiatry programs, which are accredited by the Council on Podiatric Medical Education (CPME).

It is the policy of UTHSCSA that if accreditation standards exist (ACGME, ABMS board, or CPME), UTHSCSA sponsored programs must apply for and receive such accreditation.

Fellowship programs which are not subject to either ACGME or CPME accreditation are the responsibility of the Chairs in whose departments they are based. The processes which follow have been developed in order to assist departments with administrative oversight of these programs and to provide a mechanism whereby the Dean can assess departmental oversight.

If the fellow does not possess a Texas Medical License, and will require a training permit issued by the Texas Medical Board (TMB), the program will need to undergo Internal Review before the permit application will be reviewed by the TMB.

I. Program Processes Selection and Appointment - Fellow selection processes must be free from impermissible discrimination. In compliance with all federal and state laws and regulations, the University of Texas System Policy, and Institutional Policy, no person shall be subject to discrimination in the process of fellow selection on the basis of gender, race, age, religion, color, national origin, disability, sexual orientation, or veteran status.

All fellow applicants must be subjected to a Security Background check before beginning fellowship training. Any individuals listed by a federal agency as excluded, suspended, or otherwise ineligible for participation in federal programs are ineligible for residency or fellowship at UTSCSA.
Appointment can be at the faculty or fellow level.

Faculty appointees will be appointed through the UTHSCSA faculty appointment process, will be governed by UTHSCSA faculty policies and procedures, including policies regarding medical liability coverage.

Fellows in non-ACGME programs may be appointed at the fellow level within a Department subject to approval by the Department Chair and the Dean, School of Medicine. Governing policies and procedures will be the responsibility of the department.

**Credentialing** - Clinical credentialing may be at the trainee or practitioner level, according to the goals of the program and department and hospital policies.

**Appointment** - Level, Duration, Conditions for Reappointment, and Non-Renewal - Programs must have written policies addressing these issues, and they must be shared with the applicant.

**Licensure** - Fellows who perform clinical duties must be authorized to do so by the TMB via either a medical license or a physician-in-training permit. The rules for permits and licenses are complex, and approval may take a significant amount of time. If the fellow is to work under a physician-in-training permit, the TMB requires prior review and approval of the program curriculum - this is likely to require additional time.

**Evaluation** - Fellows in training must be evaluated periodically, and written records must be maintained. Fellows must be given periodic feedback on performance, and must have access to their written evaluations. Fellows must be notified promptly in writing if an evaluation may result in an adverse action such as probation, non-advancement, or termination. Fellows should be given the opportunity to indicate in writing when they have disagreements with the written evaluation. Programs must have written policies addressing evaluation, and they must be shared with the applicant.

**Supervision** - Fellows in training must be supervised appropriately. Programs must have written policies addressing supervision, and they must be shared with the applicant.

**Duty Hours** - Fellows in non-ACGME programs are subject to the same duty hour limitations as those in ACGME-accredited programs. Please see GME Policy Manual: Policy on Resident Duty Hours.

**Promotion** - For programs of greater than one year in length, programs must have written policies addressing promotion, and they must be shared with the applicant.

**Termination/Grievance and Appeal** - Programs must have written
policies addressing these issues, and they must be shared with the applicant. Fellows appointed as faculty have access to UTHSCSA policies for appeal of termination. Those appointed as department level fellows have access to an appeal process within the department only.

**Checklist** - a checklist of processes follows. The Program Director and Department Chair should employ these checklists to ensure that processes are careful and complete.

[Checklist for Entry]