

OVERSIGHT AND MONITORING OF DUTY HOURS AND THE WORK ENVIRONMENT

Reviewed and Approved by the GMEC: July 21, 2009

To help monitor duty hour compliance the Graduate Medical Education Committee (GMEC) has mandated that all residents log their duty hours using the Graduate and Undergraduate Medical Education Software “New Innovations”. Residents that do not log their hours in a timely manner may be suspended from clinical activities. When such a suspension is found to be necessary, the Designated Institutional Officer (DIO) will immediately notify the appropriate departmental program director. The program director will have five (5) working days to get the resident in compliance with the requirement or the resident will be suspended, without pay, until the requirement has been met. If the resident disagrees with the recommended action, the resident has access to the grievance process outlined in the grievance policy.

To strengthen institutional compliance practices with duty hour requirements, the following procedures have been implemented.

1. All training programs are required to monitor their residents' duty hours on each rotation using the Duty Hours Module in New Innovations. The GME Office will generate and evaluate the programs compliance with the duty hour rules on a monthly basis and contact any program director who has residents that are in violation of the established duty hour rules, prior to the regularly scheduled monthly meeting of the GMEC.
2. If a resident is found to be in violation of the duty hour rules, the respective Program Director will be requested to provide a written report to the GMEC with the following components:
 - a. confirm the adequacy of resident compliance with logging duty hours;
 - b. identify all areas of non-compliance and perform a root cause analysis of the problem;
 - c. institute corrective action to resolve the problem be it resident or faculty education, rotation schedule alteration, or shift change issues; and
 - d. report to the GMEC in writing of the implementation of the corrective actions to include follow-up monitoring to be sure that recurrence of the problem does not occur.

The GMEC will review these reports. If the problem is reoccurring or persists, or it is felt by the committee that the corrective actions taken by the Program Director are not adequate as determined by a vote of the GMEC, then an Ad Hoc Committee comprised of the Program Director of the program involved, the Coordinator of the program involved, the DIO, the GME Specialist, and an additional member of the GMEC will perform a focused review of the program relative to the issue resulting in the duty hour violation. Their recommendations will be submitted to the GMEC for approval and then instituted.

Monitoring of results will be submitted in writing to the GMEC including monthly follow-up reports over a 6 month period. If, for any reason, this does not permanently correct the problem then the issues involved and all previous actions taken will be directed to the offices of the Dean and the Vice-President of the Health Systems for definitive resolution.

3. The DIO will report on the status of compliance of resident duty hours at the Organized Medical Staff Meetings of the participating institutions as part of the regularly scheduled GMEC reports presented at those meetings.
4. Any resident may report violations of any duty hour rule through procedures established by each program and/or by calling the Designated Institutional Official, Institutional Ombudsman, and/or Graduate Medical Education Office. All such reports whether anonymous or not will be investigated by a GMEC representative member appointed by the DIO with a written response to the report submitted to the GMEC as soon as feasible.
5. Any evidence of non-compliance, either by feedback from resident surveys or anonymous complaints to the ACGME hot-line will prompt a focused review by an Ad-Hoc committee of the GMEC comprised of three members, a program director, an administrative representative on the GMEC, and a resident member of the GMEC. A written report of the focused review will be submitted to the GMEC with recommended corrective actions. The GMEC will review, modify as necessary, and approve by majority vote. Follow-up reports to the GMEC will occur from the program involved.