

## 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 5, 2024; August 7, 2023; February 6, 2023
REVISED DATE:	August 5, 2024
ACGME ACCREDITATION STANDARD REFERENCE:	Institutional Requirement: IV.K. Clinical and Educational Work Hours

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### 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 wellbeing. This structure is facilitated by following the 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 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 HSP and the faculty.

### **Program Director Responsibilities**

- Program directors should ensure HSP function in an environment that has safe patient care and a sense of HSP wellbeing. Schedules should be structured so HSP can 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 the 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 through New Innovations and approving/commenting on 80-hour violations. Repeated violations should lead to the restructuring 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 HSP may remain or return only if the decision is made voluntarily. HSP must not be scheduled beyond work period restrictions or required to stay by an attending or more senior HSP.

### **HSP Responsibilities**

- HSP 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 that violation.
- Logging of work hours:
  - Failure to accurately log 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:
    - 1<sup>st</sup> infraction in an academic year–
      - HSP and program responsibilities: A meeting will occur with the program director or designee wherein failure to comply with the work hour policy will be discussed. The HSP will have 3 days from the time of this meeting to complete their logging. If, after the 3 days, the work hours are not completed, the hours will be considered incomplete resulting in progression to 2<sup>nd</sup> infraction.
    - 2<sup>nd</sup> infraction in the same academic year–
      - HSP responsibility: Timely completion of logging and performance of an administrative project determined by the CCC/program director.
      - Program responsibility: CCC/program director determines appropriate administrative project and any other remedial actions as suitable.
    - 3<sup>rd</sup> infraction in the same academic year–
      - HSP responsibility: Adherence to the Under Review action plan and any other consequences determined by the program.

- Program responsibility: Placement of HSP on Under Review status. The program may implement other sanctions such as forfeiture of elective block rotation, and/or loss of stipend eligibility for HSP conferences. Potential probation and/or dismissal from the program if noncompliance continues.

Programs have the right to add additional consequences as needed to ensure compliance. HSP should report a pattern of excessive work hours 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 may be placed under Special Review when deemed appropriate, as outlined in the Special Review Policy.
- The GME office will distribute to each program monthly logging reports. Program directors should pay particular attention when logging compliance is less than 100% for 2 consecutive months. The GME office is available to provide 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.
- Each program's monthly work hours are reported at each GMEC meeting. 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 response as to how they intend to remedy the situation. The GMEC will vote on whether to accept the response.

#### **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.