To be considered for Full Active Membership in LECOMT, each institution must be processed according to the following LECOMT Application Procedure: Policy: The LECOMT Board of Directors will be charged with assuring institutional compliance to the standards, policies, and procedures of LECOMT for all applicants and members.

## Purpose:

To establish new member application process and guidelines for annual renewal of membership

- Institutions interested in becoming Full Active members of LECOMT must complete the LECOMT Application for Membership and submit with this application with the requested supporting documentation listed on page 9 of the application (Affiliation Agreements, Sponsorship Agreements, Conflict of Interest for Board representative)
- 2. Any institution with AOA postdoctoral programs must apply for Full Active Membership.
- 3. Any institution not intending to have or apply for an AOA approved postdoctoral program must apply as a General Active Member.
- 4. The LECOMT Executive Committee will review each application and the supporting documentation.
- 5. The Executive Committee or Executive Director will present its findings to the Board for final action.
- 6. Board may cast vote for new member applications by email/written vote.
- 7. Approval of new applicants shall be the responsibility of the Board and such approval shall cause the applicant to become a member of LECOMT.
- 8. Institutions must submit with their application the initial application fee (Level 1-Full Member \$10,000 or Level 2-\$5000.00).

Continuing membership guidelines:

- Institutions must submit their annual dues upon receipt of invoice from LECOMT. Invoices are sent from the LECOMT Office of the Executive Director on a Fiscal Year ending June 30th of each year. Annual fees/dues are set each year by the LECOMT Board of Directors.
- 10. Institutions must submit the requested/required annual data to LECOMT –e.g. database of trainees, core faculty, research and educational programming, Annual update of ICCP, etc.
- 11. Any member failing to submit their annual dues will be terminated from LECOMT as a full active member.

Purpose: Define the responsibilities /qualifications of Academic Officer

- 1. The Academic Officer shall be an appointment from the Lake Erie College of Osteopathic Medicine/ Office of the Provost.
- 2. The AO must be a graduate from a COCA approved college of osteopathic medicine with an earned degree of Doctor of Osteopathy.
- 3. The AO shall have completed at least one year of approved osteopathic postdoctoral training.
- 4. The AO must be board certified by the Bureau of Osteopathic Specialties
- 5. The AO shall have an expert knowledge of the AOA Basic Documents for Postdoctoral Training, and of the residency standards of the specialty colleges.
- 6. The AO shall visit each member institution at least annually, review critical documents and perform such interviews as are needed to assure compliance with published standards.
- 7. The AO or his/her designee shall attend all site inspections
- 8. The AO shall act as Chairperson of the LECOMT OGME Committee
- 9. The AO shall prepare all agendas related to the OGME Committee
- 10. The AO in concert with the OGME Committee is responsible for the quality and compliance of all ICCPs, Corrective Action Plans, Implementation of Corrective Action Plans, and ICCP annual updates, and Internal Reviews.
- 11. The AO will assist in the development of new OGME residency programs
- 12. The AO will assist the Assistant Dean of Clinical Education in the growth of clerkships for 3<sup>rd</sup> and 4<sup>th</sup> year LECOM students.
- 13. The AO will assist in the development and implementation of the LECOMT Strategic Plan by the LECOMT Board of Directors.
- 14. The AO will be responsible for LECOMT sponsored resident educational programs, faculty development programs and CME as the Chairman of the OGME Committee.

Purpose: To assure LECOMT member institutions maintain accreditation of their facilities to meet AOA Basic Documents Institutional Requirements

- 1. All members of LECOMT shall submit evidence of their licensure or accreditation of their facilities upon application to the LECOMT OPTI. (E.g. copies of HFAP, Joint Commission Accreditation document).
- 2. If a member has a change in this accreditation or licensure status they must report this to the LECOM Executive Director as a substantive change.
- 3. College of Medicine members shall be required to maintain accreditation by the AOA COCA or if a non-osteopathic college of medicine-the LCME.
- 4. Affiliated health care centers/entities are required to maintain accreditation as is pertinent to their educational, clinical, or research mission.

LECOMT shall maintain current list of accreditation for each member institution and update on a 2 year cycle. Copies of the accreditation documents will be maintained in the LECOMT office.

Purpose: To assure LECOMT member institutions maintain a current and accurate affiliation agreement

- 1. All members of LECOMT shall agree to and sign the LECOMT Affiliation and Sponsorship Agreement.
- 2. Agreements will be reviewed on an annual basis. The agreements will require renewal after a term not exceeding five (5) years.
- 3. Any requested amendments or changes to the agreed upon LECOMT agreements will be reviewed by LECOM in-house legal counsel.
- 4. All agreements will be maintained in the Office of the Executive Director.

Purpose: To assure LECOMT reports accurate and timely annual report data to COPTI

- 1. The OPTI Annual Report shall be the direct responsibility of the Executive Director
- 2. The report shall be submitted by the date required by the AOA COPTI (typically by September 1 of each year)
- 3. Member institutions must submit the required data to the ED
- 4. The ED will review the domains of the Annual Report at the Spring OGME and Board meeting to assure the timely collection of data before Sept 1<sup>st</sup>.
- 5. The members shall report data related to trainees, increases in approved positions; closure of programs; approved positions, funded, and filled positions; core faculty lists; core faculty participation in faculty development and assessment of individual core faculty members; changes in administration, ownership at base institutions; research activity and scholarly activity of trainees and faculty.
- 6. The OPTI Annual Report is submitted electronically to COPTI and a copy of the COPTI approval of the Annual Report will be maintained in the ED office.

Purpose: To assure LECOMT archives and keeps safe all documents chronically the official business of the OPTI.

- 1. The OPTI Executive Director shall be directly responsible for the safekeeping of all documents that chronicle the official business of the OPTI. E.g. meeting agendas, minutes, attendance, invoices, financial records, applications, etc.
- 2. LECOMT will electronically file documents to the LECOMT server. Theses servers meet the strict FERPA requirements for server protection.
- 3. The Office of the ED shall maintain e-files of all trainee completion for purpose of verification of training. LECOMT maintains a copy of all certificates of completion.
- 4. The LECOMT ED office shall maintain a database of trainees by AY, with the following fields, full name, institution, the start and end date, OGME years, specialty, any breaks in training, AOA #, DOB, and email address.
- 5. The LECOMT ED office shall maintain a database of LECOMT core faculty per hospital per program.
- 6. Fire Proof cabinet is utilized for any paper records not saved to electronic file.
- 7. All resident training records shall be maintained in locked and secured storage areas at member training institutions. Each institution may identify the appropriate area within its facility for such storage. These records include, but are not limited to: Primary training application Transcripts Letters of recommendation Procedure and appropriate patient logs Resident credentials Resident permanent or temporary training licenses Recent DEA numbers Resident evaluations Honors and awards
  - Communications regarding adverse actions such as reprimands, probation, or limitations of privileges

If the member institution initiates cessation for all training programs, or if closure of the institution is anticipated, all such records must be transferred to the LECOMT main office for safe keeping of permanent records.

Purpose: To assure LECOMT governing documents are reviewed and updated

- 1. The LECOMT Board of Directors shall review and approve the LECOMT Bylaws at a minimum every five years when crafting the Five Year Strategic Plan.
- 2. Any member of the board may submit a resolution to the board for bylaw change recommendations.
- 3. All bylaw changes must be reviewed and approved by the LECOMT Board of Directors.
- 4. LECOMT ED office will maintain chronological records of the bylaws and designate amendments to the bylaws by dates on the cover of the document.
- 5. LECOMT Bylaws will be distributed to the LECOMT BOD with any final revisions.
- 6. LECOMT Policies and Guidelines will be established and maintained by the BOD.
- 7. LECOMT Policies will be updated as necessary and will align with the AOA Basic Documents for Postdoctoral Training.
- 8. Bylaws and Policies are submitted to in-house counsel for review and recommendations before final version submitted to BOD for approval.

Purpose: To assure LECOMT remains financially solvent to achieve the mission and objectives outlined in the Strategic Plan

- 1. The LECOMT ED, CFO, AO work together to formulate the LECOMT annual budget for the operations of the LECOMT OPTI.
- 2. The OPTI shall operate on the Fiscal Year July 1 –June 30<sup>th</sup>.
- 3. LECOMT shall maintain a cost center within the LECOM operations and budget.
- 4. The annual budget shall consider all revenue sources and reasonable expenses to be incurred by the OPTI within the fiscal year.
- 5. The CFO shall review the budget and expenses at every BOD, Executive, and OGME committee meeting. The BOD has the authority to modify the budget at any time to reflect significant changes in the assumptions used to prepare the budget.
- 6. The ED in concert with the LECOM accounting department maintains statements of accounts reflecting all expenses incurred.
- 7. The ED reviews the distribution report and budget for accuracy.
- 8. The CFO assigns the code within the cost center for tracking of expenses in relation to the budget and strategic plan.

Purpose: To assure LECOMT publishes a catalogue and listing of its member institutions, programs and pertinent information relating to the institutions and programs

- 1. The LECOMT office shall be responsible for the OPTI website. The online catalogue will be maintained on the LECOMT website.
- 2. LECOMT will distribute an annual survey and copy of existing website data for members to update.
- 3. Institutions must provide programs offered; qualifications for entry to program; salary and benefits; process to apply; clerkship opportunities; contact information; and a hospital/program description.
- 4. LECOMT shall work in concert with the LECOM Information Technology Web Designer/Manager to maintain a website that is current and meaningful to medical students, residents, and other community partners.

Purpose: To assure LECOMT has a system for the awarding of certificates of completion to trainees

- 1. The LECOMT OPTI shall provide a certificate of completion to all trainees successfully completing the requirements in a LECOMT sponsored AOA accredited postdoctoral program.
- 2. The DMEs and PDs of the LECOMT sponsored programs shall submit from their GMEC committee the list of candidates who have attained the following:
  - a. Satisfactory completion of the internship, residency, fellowship in accordance with the AOA basic standards for residency training.
  - b. Attainment of the core competencies as defined by the AOA and specialty college.
  - c. Submission of all required documents to the AOA and specialty collegeincluding research papers, scholarly activity, logs, evaluations, annual reports.
- 3. The certificate awarded by LECOMT is prepared in accordance with the BOD guidelines –certificates are produced by Josten and a uniform design is maintained.
- 4. Accurate details must be submitted by the DME office regarding exact names, start/end dates, specialty, hospital/program name and number, and signature lines.
- 5. The certificate shall maintain the name and seal of the COM, signatures of the President and Provost, the name of the institution, and the OPTI name.
- 6. LECOMT covers the cost of the certificates of completion. Replacement costs of issued certificates must be covered by the trainee or institution.

Purpose: To establish defined reporting mechanisms

Procedure:

- 1. It is the responsibility of the DME of each member institution to report to the AOA individual trainees' successful completion of each training year.
- 2. Reports are due to the AOA sixty (60) days from the completion of the academic year, normally by September 1.
- 3. Each institution is to submit copies of this report to the LECOMT office in order to maintain accurate record keeping in our database.
- 4. LECOMT will confer certificates of completion on those interns/residents who have successfully completed the requirements for graduation and have been recommended for graduation by the postdoctoral faculty of the program.
- 5. DMEs from each institution are responsible for submitting the certificate order information to the LECOMT office (in the required time) in order for certificates to be obtained in accordance with the Certificate of Completion Policy.

Purpose: To establish defined procedure for the accurate and timely submission of required documentation of OGME 1-R trainees' completion.

In response to the AOA COPT Resolution 22 passed in July 2008, Option 1 programs must issue a standard letter to each trainee upon successfully completing his/her OGME-1 year.

Trainees participating in an Option 1 specialty are entering directly into a residency program will not be provided with a separate OGME-1 certificate.

LECOMT Directors of Medical Education are responsible for issuing the standard OGME-1 letters to each Option-1 trainee upon successfully completing his/her OGME-1 year and before entering the OGME-2 year. The DME must copy LECOMT on each of these letters and submit the copy to the LECOMT office for safe keeping.

Sample Suggested Letter Format from AOA:

To whom it may concern:

This letter is to verify that (John Doe), DO, successfully completed all requirements of an American Osteopathic Association (AOA) approved OGME-1 year at \_\_\_\_\_institution name\_\_\_\_\_\_and AOA program number\_\_\_\_\_. The program dates for John Doe, D.O. was from (start date) to (end date).

If you have any questions, please feel free to contact me at (phone number)\_\_\_\_.

Sincerely,

(Director of Medical Education)

CC: Deborah Lee-Sanko, Executive Director, LECOMT, 1858 West Grandview Boulevard, Erie, Pennsylvania 16509

Purpose: To establish defined procedure officers and board members of LECOMT to report conflicts of interest or potential conflict of interests.

## CONFLICT OF INTEREST STATEMENT

It is the policy of the governing board of LECOMT to require its governing board members, officers and managers to discharge their duties in good faith and with undivided loyalty to the interests of the Consortium. Therefore, it is incumbent on each to:

- 1. Conduct him/herself in the interests of the Consortium without consideration of the interests of any other person, company agency, organization or association.
- 2. Disclose any material, financial, or other beneficial interest in any educational organization or any entity providing goods/services to the Consortium.
- 3. Disclose any transaction with the Consortium resulting in any material, financial or beneficial interest and refrain from participation in that transaction unless authorized by the board after full and frank disclosure.
- 4. Refrain from using any information obtained within the scope of his/her responsibilities to the Consortium to his/her material, financial or other beneficial interest or the interest of any other person, company, agency, organization, or association with which he/she is associated.

Governing board members, officers and managers of the organization will be required on an annual basis to disclose in writing all interests which could result in a conflict.

Further, governing board members are subject to the provisions of the Directors' Liability Act, Section 8363 [42 Pa. C.S.A., 8363 (a)] which provided in part:

A director of a nonprofit corporation shall stand in a fiduciary relation to the corporation and shall perform his duties as a director, including his duties as a member of any committee of the board upon which he may serve, in good faith, in a manner he reasonably believes to be in the best interests of the corporation and with such care, including reasonable inquiry, skill and diligence, as a person of ordinary prudence would use under similar circumstances.

LECOMT BOD and officers shall complete the required Conflict of Interest Statement Form and these are maintained in the ED LECOMT office, and review annually. The LECOMT Board of Directors and the LECOMT Osteopathic Graduate Medical Education Committee will assure institutional compliance to the standards set forth by the AOA to achieve the objectives of the OPTI and the quality of the educational programs.

Purpose: To establish and demonstrate LECOMT's involvement and commitment to provide oversight and academic support to all LECOMT postdoctoral programs as it relates to the inspection and oversight process.

- 1. Upon receipt of notice of inspection contact the LECOMT office.
- 2. LECOMT upon notification from AOA Fileworks will forward any information from Fileworks to the DME and PD.
- 3. LECOMT staff is available to assist you in the preparation of your inspection, as well as being present on the day of the inspection.
- 4. Submit a copy of your completed crosswalk and supporting documents to LECOMT prior to submitting to the AOA. Please be mindful of the deadlines in submitting the required information to the AOA Professional reviewers.
- 5. After the inspection has occurred, the specialty college will submit a resolution to the PTRC regarding program approval and deficiencies.
- 6. LECOMT will receive a "preview" of the inspection report from the AOA PTRC agenda. Programs will be notified by the ED or AO of the any deficiencies. Programs will have a right to submit "ERRORS IN FACT" and evidence to the AOA staff prior to the PTRC. LECOMT and PDs will have 10 days to submit any "Errors in Fact."
- 7. LECOMT will accompany and /or represent programs at the PTRC meetings to address Extracted Program approval items or Errors in Fact.
- 8. Any program receiving less than a 3 year approval will be monitored by the LECOMT AO, ED, and Oversight Review Committee until all deficiencies have been proven to be resolved.

Policy: LECOMT postdoctoral programs shall provide adequate exposure to medical research/review skills and methods of presentation, including information relating to changes in the health care delivery system. Options for meeting the above requirements are determined by each program director/director of medical education in association with the respective specialty college.

Purpose: To establish guidelines and options for meeting the above requirement in association with the respective specialty college and may include, but not limited to the following:

1. Original research studies (basic science, clinical studies, health services research) and writing.

2. Retrospective studies (medial records analysis)

3. Entry in Specialty College Annual Resident Medical Writing/Research Competition

4. Presentation of a scientific poster/abstract at the Specialty College Convention or AOA National Convention

5. Resident education program on research types and methodology (CITI)

6. Resident education programs on biostatistics

7. Formal written critique by the program director or designee of resident presentations of journal club articles/literature review (e.g. credibility of material, data statistics and study design)

8. Educational program for resident in health services research, policies, administration, (e.g. access of population groups to health care, compliance issues, public policies, managed care, etc.)

9. Educational programs on "How to Read and Understand the Medical Literature"

LECOMT recognizes and respects the diversity and uniqueness of each of our member institutions and therefore relies on the expertise of each institution's DMEs and postdoctoral training committee to select and evaluate their own teaching faculty.

The DME &/or Residency Program Directors in concert with their GMEC appoint and manage faculty of all postdoctoral programs either through their office or appropriate postdoctoral training committee. This includes the use of policies both written and verbal. Faculty members certified as core faculty in good standing by the DME and GMEC shall receive appointments through LECOM in accordance with LECOM's faculty appointment process.

The DME and Residency Program Directors at each institution are held responsible for reviewing the performance of each faculty member on an annual basis. Evaluations of the teaching staff provided by the interns and residents should be taken into account in these reviews. The DME and Residency Program Directors shall certify that these reviews have been conducted as part of the annual confirmation of continuing faculty appointments. LECOMT member institutions must conform to all federal and state policies regarding equal opportunity without regard to sex, age, ethnic background, creed, and sexual orientation, veteran's status and non-limiting disabilities.

All non-osteopathic members of the faculty should have a basic understanding of osteopathic principles and practice and OMT. Institutional policies should be established to ensure that the faculty:

Nurture interns' and resident' education;

Demonstrate sound clinical practices and teaching abilities;

Support of LECOMT's mission and objectives;

Attain the goals and objectives of the programs with which they are associated; Expand their own medical abilities and knowledge, skill and education; and Participate in scholarly activities

LECOMT shall maintain a database of core faculty and faculty appointment status/expiration by faculty name/institution/program/specialty.

LECOMT is committed to the advancement of knowledge, including osteopathic contributions to medicine through scientific research.

LECOMT will provide support for facilitating resident participation in research requirements and/or projects by an osteopathic specialty college.

LECOMT will identify and list research resources and opportunities available to interns and residents within the OPTI.

LECOMT has identified research-related educational objectives for interns and residents in association with the specialty college.

LECOMT will provide ready access to basic science and/or clinical research mentorship. LECOMT will identify statistical support services available to interns and residents.

## Trainees may contact LECOMT's Research Contact Person: Bertalan Dudas, M.D., Ph.D., Director of Research 814-866-8142

814-800-8142

E-Mail: bdudas@lecom.edu

Lake Erie College of Osteopathic Medicine 1858 West Grandview Boulevard Erie, PA 16509

Dr. Dudas is identified as the resource person for any research-related activity for the consortium. Dr. Dudas will assist in statistical support and research design services. Dr. Dudas is a member of the LECOMT OGME Committee which is the forum used for residents, interns, and program directors to review/generate ideas and request academic support from the OPTI and college.

LECOMT utilizes the OGME Committee Meeting and Resident Representative Meetings as the mechanism for informing Interns/residents/program directors of research resources and opportunities. LECOMT grant applications can be found on the LECOMT website for the grant application period only. Grants are awarded by June 1<sup>st</sup> every year to grant award recipients.

The LECOMT web site incorporates research opportunities and resources for Internet access by interns/residents/program directors.

Basic Science and Clinical research faculty mentorship is available and coordinated through Bertalan Dudas, M.D., Ph.D., Research Contact, and Richard R. Terry, D.O., FACOFP, Academic Officer.

Purpose: To assure LECOMT is notified of significant events, activity that may impact the postdoctoral programs sponsored by the OPTI.

As per the LECOMT Bylaws, member institutions will notify the LECOMT Executive Director of any substantive change related to their institution.

Further defined, the Director of Medical Education &/or the individual who represents the institution on the LECOMT Board of Directors is responsible for the advance and timely reporting of any substantive change.

Examples of Substantive Changes are defined but not limited to:

- Significant Financial change that may affect the delivery and quality of the training program(s).
- Closing of AOA-accredited postdoctoral programs due to the lack of intern/residents in the program for three consecutive years.
- Closing of an AOA-accredited postdoctoral program due to the determination that the program fails to meet minimal educational standards for continued accreditation.
- Voluntary closing of an AOA-accredited program.
- Downsizing or increasing the number of AOA-accredited postdoctoral program positions.
- Change in leadership e.g. CEO, Director of Medical Education/Residency Program Directors
- Addition of Postdoctoral Programs/Application for New Residency Programs.
- Training program interruptions or closures due to a catastrophic event.

LECOMT reports any substantive changes at the BOD, Executive Committee and OGME Committee meetings.

Purpose: To expedite the transfer of trainees when a hospital/program closes

As stated in the LECOMT catalog: "Should an emergency situation arise during an academic year rendering a member institution unable to fulfill its obligation to continue the training of its interns/residents, LECOMT will make every possible attempt to find alternative training for the interns/residents at other LECOMT institutions, to the extent allowable by law and AOA policies.

Member hospitals must give adequate and timely advanced notice of anticipated program terminations, closures or downsizing.

Member hospitals per AOA resolution No. 31 must notify:

- 1. The American Osteopathic Association
- 2. The OPTI
- 3. Its internship and residency program directors
- 4. Its interns and residents

2. Member hospitals shall notify LECOMT Executive Director and Academic Officer prior to notification to the AOA.

 3. LECOMT will provide assistance to any intern or resident adversely affected by an AOA or individual hospital decision to end or downsize an OPTI-sponsored program.
4. LECOMT will provide information to the intern/resident of programs within the OPTI having vacancies.

5. In instances when no vacancies are available, LECOMT will assist the intern/resident in contacting other OPTIs with the assistance of the AOA Office of Education.

LECOMT is dedicated to exceeding basic established levels of quality for postdoctoral education.

Purpose: To establish guidelines and to encourage continuous quality improvement.

LECOMT will review interns and resident manuals.

LECOMT will review each postdoctoral programs goals and objectives.

LECOMT will review each postdoctoral programs curriculum and rotation schedules, suggested reading lists, and research requirements.

LECOMT will conduct on-site visits to each institution at a minimum of one time per year.

Interviews with interns, residents, and faculty will be completed on these visits. LECOMT will review with the DMEs &/or Residency Program Directors the AOA Basic Documents and Basic Standards for Residency. Any revisions by the AOA to these documents are reviewed at the next scheduled OGME Committee Meeting.

LECOMT encourages DME/RPD (Residency Program Director) mentoring and in addition to faculty development will partner new DMEs/RPDs with experienced DMEs/RPDs. LECOMT will conduct pre-inspections of training programs

LECOMT will utilize Medical Professional Performance System (MPPS) to assess resident performance according to the AOA core competencies. Tracking of OPTI-wide resident performance outcome data will be utilized for the strategic planning of educational programming, curriculum changes and faculty development. LECOMT requires members to establish policies and guidelines for scientific research in order for trainees to safely conduct their required/desired research projects as required in their training. Guidelines and policies should follow the Code of Federal Regulations Office for Protection from research Risks. Part 46: Protection of Human Subjects. Department of Health and Human Services National Institutes of Health. LECOMT members may contact the Dean of Research for assistance with review of policies and guidelines.

Consortium wide projects are to be coordinated through:

Richard R. Terry, D.O., FACOFP <u>rterry@lecom.edu</u> LECOMT Academic Officer

Bertalan Dudas, M.D., Ph.D. <u>bdudas@lecom.edu</u> LECOMT Research Contact

LECOMT recognizes and accepts the individual processes for research approval through each hospital IRB.

LECOMT will assist interns/residents with the IRB process and when multi-site projects are involved will assist with coordinating efforts between hospitals in the consortium. LECOM will provide access to online research teaching modules via CITI.

LECOM IRB Chairman (Irving Freeman, PhD, JD) is available to review policy and questions for trainees as it relates to the project and IRB. Dr Freeman may be reached at <u>Ifreeman@lecom.edu</u>

LECOMT institutions are equal opportunity employers; applicants are considered for all positions without regard to race, religion, gender, national origin, age, marital status, sexual orientation, veteran's status, or physical disability.

LECOMT does not discriminate in the selection of faculty, administrative personnel, interns or residents on the basis of race, sex, color, religion, creed, national origin, age, sexual orientation or physical disability. All LECOMT members shall adhere to this policy of non-discrimination.

The above statements of non-discrimination are published on the LECOMT web site and in the LECOMT bylaws.

The AOA has charged each OPTI the task of overseeing their partner institution's on-call and work hour policies for interns and residents. To ensure compliance we have established the following protocol for the intern or resident to report any inconsistencies or infractions in their hospital's published work hour policy:

1. The intern or resident must initially report in the manner outlined in "Policies Governing Evaluation & Appeal Mechanism" of their institution's Intern/Resident Manual.

2. In the event the intern or resident feels his/her concerns were not addressed properly, they may then contact their designated Intern or Resident Representative of LECOMT's Osteopathic Graduate Medical Education (OGME) Committee or the LECOMT Academic Officer at rterry@lecom.edu.

3. LECOMT and each member institution agree that there can be no reprisals for the intern/resident reporting the inconsistencies or infractions in the hospital's published on-call and work hour policy.

4. Each LECOMT member institution must include in their intern/resident manual this LECOMT policy to assure the intern/resident has received proper notification of the appropriate protocol and OPTI contacts.

5. LECOMT will also post this policy on the intern/resident bulletin board of the LECOMT web site.

6. LECOMT will review work hour policies and duty hour records during onsite reviews and preinspections.

LECOMT Executive Director: Deborah Lee-Sanko dsanko@lecom.edu

LECOMT Academic Officer: Richard R. Terry, D.O., FACOFP 1858 West Grandview Boulevard Erie, Pennsylvania 16509 E-Mail: rterry@lecom.edu Policy: It is the responsibility of the DME of each member institution to submit Corrective Action Plans to the OPTI for approval and signature.

Purpose: Required in OPTI Standards as defined by the AOA.

To allow the Academic Officer and OGME Committee the ability to review and approve the plan of correction prior to the plan being submitted to the specialty college and AOA.

Procedure:

1. Forward copy of deficiencies and plan of correction in a timely manner to allow adequate intervention and input.

2. Executive Director will review and distribute to the OGME Oversight Review Committee

3. OGME ORC will provide feedback and approve/disapprove plan

3. If satisfactory, the plan will be signed and submitted by LECOMT to the AOA with copies of packet to the DME.

4. If unsatisfactory, the AO and ED will contact the DME &/or internship/program director via teleconference to discuss the deficiencies and plan. A new plan will be developed and signature sheets as above will be attached incorporating all of the recommendations of the OGME ORC.

5. All corrective action plans are reviewed at the OGME Committee meeting. Due to the requirement to return the corrective action plan to the

AOA in a timely, specified time, the plan will be reviewed at the next scheduled OGME but may not be reviewed by the entire OGME prior to being submitted to the AOA, but always reviewed by the ORC of the OGME, AO, and ED.

6. A plan will not be delinquent to the AOA because of the OGME committee schedule, and therefore the ORC and AO will have the authority to review and sign without the full committee approval. The committee will always have the opportunity to review and make recommendations to amend.

7. All Corrective Action Plans and signature sheets are maintained in the LECOMT office.

8. Corrective Action Plans will be monitored for compliance and continued action by the AO and OGME Committee.

9. ALL Corrective Action Plans, per the AOA standards are submitted to the AOA by the OPTI and not direct from the program.

10. Implementation of CAP will be tracked and monitored by LECOMT. Reminder emails will be sent in advance. Evidence of implementation of CAP is vetted through the same procedure outlined above for the CAP.

The OGME committee shall ensure that clinical graduate training programs in the LECOMT OPTI meets AOA institutional and residency performance standards.

The LECOMT member hospital/program review will be scheduled by the GME Committee of the institution for each AOA-accredited program mid-cycle between its AOA site visits, or as otherwise needed. In programs with a longer 4-5 year review cycle, there may be leeway in that the review may be completed either three months prior to or three months post the actual mid-cycle date. In programs with shorter review cycles, there will less flexibility. If problems exist in scheduling internal reviews, the DME of each institution shall forward its concern to the Academic Officer or Executive Director for resolution. LECOMT will maintain a tracking system with last inspection date, copies of inspection reports and anticipated date of mid-cycle internal review. Reminder emails and calls will be made to program directors and DMEs. DMEs shall coordinate the IR with the AO or ED to participate in the review either in person or via teleconference.

The DME/program director must forward copies of the completed Internal Review reports to the LECOMT office for the AO and ED review. The IR is reviewed by the OGME ORC. Following the review and notification of the outcome of the review, the AO&/or ED may require follow up teleconferences &/or on-site visits for any programs with ongoing difficulties in meeting the AOA standards. LECOMT will continue to assist programs and act upon the concerns until the issue is appropriately addressed and resolved.

Internal Reviews will be summarized at the next scheduled LECOMT OGME Committee. Standardized Format recommended by the AOA was shared with the LECOMT members. The AOA sets forth the requirement for the regular review of all graduate medical education programs, pursuant to a written protocol, for the purpose of assessing compliance with both the Institutional Requirements and Program Requirements of the relevant AOA Residency Standards. The review is to be conducted between the

AOA/specialty college program surveys and should appraise the following:

The educational objectives of the program;

The effectiveness of the program in meeting its objectives;

The adequacy of available educational and financial resources support to support the program;

The effectiveness in addressing areas of non-compliance and concerns in previous

AOA inspection letters of accreditation and previous internal reviews;

The effectiveness in defining, in accordance with the Program and Institutional

Requirements, the specific knowledge, skills, attitudes, and educational experience required for the residents to achieve competence in the following:

Osteopathic principles and practice, patient care, medical knowledge, practice-based-learning and improvement, interpersonal and communication skills, professionalism and system-based practice. The program's curriculum should include goals and objectives based on the competencies and the construction of effective evaluation tools.

Purpose: To assure the members of the LECOMT OPTI establish an institutional core competency plan in accordance with the American Osteopathic Association Basic Documents for Postdoctoral Training and the specialty college residency standards.

- 1. Each member institution shall develop an Institutional Core Competency Plan that reflects the program standards established by the AOA and the associated specialty colleges.
- 2. Each member institution must submit its ICCP to OGME Committee Oversight Review Committee for review and feedback.
- 3. Revisions to the ICCP shall be completed as needed and in accordance with any changes in program standards. Changes should be submitted at the next scheduled OGME meeting.
- 4. At a minimum, each institution must update the ICCP annually.
- 5. ICCPs shall be specific and incorporate measurable objectives and specific activities related to the core competencies. The ICCP shall reflect a graduated program of intern, resident, and fellow assessment that reflect the advancement and matriculation to the next year of training.
- 6. ICCP shall be submitted to LECOMT with a signature of the DME and date the ICCP was approved by the GMEC of the institution.
- 7. All plans will incorporate the 7 core competencies as defined in the AOA Basic Documents.

Purpose: To assure the LECOMT trainees have a forum for free and open communication with the OPTI leadership to discuss concerns without reprisal.

Policy:

- 1. LECOMT ED/AO &/or designee will host a quarterly meeting for LECOMT trainees. LECOMT staff will send out meeting notices and information and instructions for the meeting (whether in person or via teleconference)
- LECOMT member DMEs will provide prior to the start of each Academic Year (July 1) one (1) representative and one (1) alternate to serve on the LECOMT Intern/Resident Representative Committee.
- 3. When possible, the forum will be a resident run meeting, with LECOMT ED and administrative assistant as attendees. The representative to the LECOMT OGME committee will act as the resident forum leader. When this is not possible, LECOMT ED or AO or designee will facilitate the meeting (s).
- 4. Meeting attendance and notes are maintained by the LECOMT Admin Assistant.
- 5. LECOMT ED or AO follow up on concerns, issues, and suggestions from this meeting.
- 6. LECOMT trainees (who are not the designated representatives from member institutions) are welcome to call into the teleconference in addition to the assigned representatives. Meeting call in information is posted to LECOMT bulletin board.
- 7. Standard agenda items for the Intern Resident Forum
  - a. Duty Hour Violations/Call schedule issues
  - b. Research Support/Status of research projects
  - c. Educational /Curriculum needs (e.g. procedural workshops)
  - d. OMM Integration
  - e. Questions/Concerns/Suggestions

Purpose: To provide members with clear guidelines for the selection, retention and advanced standing of trainees to their training programs that meets all requirements of the AOA Basic Documents.

Policy: LECOMT members will abide by the AOA Basic Document standards that relate to selection, retention, and advanced standing of trainees.

- 1. LECOMT members will compose individual institutional policies in their residency handbook that outlines the selection policy of trainees.
- 2. LECOMT administration will review said policies on inspection and internal reviews.
- 3. LECOMT will notify members of any changes to the AOA Basic Documents relating to Selection, Retention and Advanced Standing of trainees.
- 4. LECOMT members will adhere to the Non-Discrimination, Grievance, Appeal and Remediation policies of their institutions to assure the fair and equitable treatment of all trainees.
- 5. LECOMT members will adhere to the specialty college requirements for request for advanced standing. All paperwork requesting advanced standing will be forwarded to the LECOMT office. LECOMT will upload all Requests for Advanced Standing to the AOA Fileworks.
- 6. LECOMT will investigate any complaints relating to selection, retention and advanced standing of trainees to assure policies have not been violated.
- 7. LECOMT members violating AOA match rules will be brought before the Board of Directors for review and are in jeopardy of termination from the OPTI.