

	<b>Graduate Medical Education</b>	
	GMEC Approval Date:	September 13, 2024
	Effective Date:	October 1, 2024
	Review/Revision Date:	September 4, 2024
Policy Title: <b>Special Review Policy and Protocol</b>		
ACGME Institutional Requirement: <b>I.B.6.</b>	Page 1 of 3	

I. **Purpose:**

In compliance with ACGME requirements, the Graduate Medical Education Committee (GMEC) must demonstrate effective oversight of underperforming programs through a Special Review process. The Special Review process must include a protocol that establishes a variety of criteria for identifying underperforming programs, and results in a timely report that describes quality improvement goals, corrective actions, and the process for GME monitoring of outcomes, including timelines.

II. **Policy:**

- A. The GMEC determines if the residency/fellowship program meets the criteria for an underperforming residency/fellowship program.
  
- B. GMEC identifies underperformance through established criteria, which may include, but is not limited to, the following:
  1. Program accreditation statuses of Initial Accreditation with Warning, Continued Accreditation with Warning, and adverse accreditation statuses as described by ACGME policies [IR:I.B.6.a).(1)]
  2. Program Attrition
    - a. Change in program director more frequently than 2 years
  3. Loss of Major Education Resources
    - a. Major program structure change to include changes in major participating sites
  4. Decrease in Scholarly Activity by residents/faculty
    - a. Graduating residents – minimum of 50% scholarly activity
    - b. Core faculty –lack of progress towards program-specific requirements for scholarly activity
  5. Case Logs/clinical experience unacceptable by ACGME specialty standards
  6. ACGME surveys and ~~other institutional & or program surveys~~ **internal self-surveys**
    - a. Resident survey-scores less than the national average or downward trends compared to previous years
    - b. Faculty Survey-minimum of 70% completion rate
  7. Board Pass rate unacceptable by ACGME specialty standards over a 3-year period
  8. Notification by ACGME Review Committee requests for progress reports and site visits, unresolved citations or new citations or other actions by the ACGME resulting from annual data review or other actions.
  9. Significant or repetitive noncompliance in duty hour trends relative to ACGME requirements.
  
- C. A special review will occur when:
  1. A program has met enough criteria established as outlined in Section B.
  2. A severe and unusual deficiency in any one or more of the established criteria.
  3. There has been a significant complaint regarding the program.
  4. The program fails to submit the ACGME Annual Update.

### III. Procedure

- A. The Special Review Committee (SRC) will be appointed by the GMEC Chairman or his/her designee. The SRC will include the Designated Institutional Official (DIO) or a designee, an administrative member of the GMEC, a residency director (not from the program being reviewed), at least one faculty member (not from the program being reviewed), and at least one resident (not from the program being reviewed). Additional faculty members and residents (not from the program evaluated being reviewed) may be appointed at the discretion of the SRC Chair. Unless otherwise appointed by the GMEC Chair, the DIO will serve as the chair of the Special Review committee.
- B. The appointed SRC Chair must schedule a Special Review so that the Special Review can be conducted within 90 days of the GMEC determination. The SRC Chair may schedule multiple SR meetings thereafter to complete the review. The GME office will assist the SRC Chair with scheduling of meetings and meeting rooms.
- C. The GMEC will provide guidance as to urgency, severity and required deadlines to the SRC Chair. The SRC must identify and address the concerns identified by the GMEC.
- D. The SRC may address the concerns by reviewing residency program data and materials such as, but not limited to previous annual program evaluations, survey results, accreditation letters of notification from the most recent ACGME reviews and progress reports sent to the ACGME review committee, the ACGME Common Program Requirements and Specialty/Subspecialty Specific Program and Institutional Requirements in effect at the time of the review, duty hour compliance information, program curriculum including conference schedules and block diagram, interviews with program director, faculty, and residents, and other appropriate means as deemed necessary.
- E. The SRC chairman will submit findings of the review to the GMEC via a written report within 90 days of the determination for a special review.
- F. The Special Review Committee shall provide a written report of its findings and recommendations to the GMEC. The report should contain, at minimum:
  1. List of members present
  2. List of individuals interviewed
  3. List of materials reviewed
  4. Rationale/Triggers for Special Review
  5. Current ACGME Accreditation Status
  6. List of ACGME Citations
  7. Summary of Special Review Findings
  8. Recommendations for program/institutional improvement goals
  9. Proposed Corrective Action Plan
  10. Proposed Process and Timeline for GMEC Monitoring of Corrective Action Plan
- G. The Special Review Chair shall submit the Special Review Report to the program director, DIO, and GMEC Chair prior to presenting before the full GMEC.
- H. The GMEC will discuss and accept the Special Review Committee's recommendations for corrective action, and /or suggest additional corrective actions.
- I. As directed by the GMEC, the Program Director will provide a ~~plan of action/plan of correction~~ corrective action plan, with quality improvement goals and a process for monitoring, including a timeline for the action plan. The Program Director of the program under Special Review will be expected to give a report on the action plan at each subsequent GMEC meeting. Progress on the action plan ~~and these actions~~ will be documented in the GMEC minutes. [IR: I.B.6.a).(2)]
- J. The Special Review Committee will meet periodically to provide its recommendation to the GMEC regarding the program's progress toward resolution of the Special Review.

K. The GMEC will determine resolution/closure of the Special Review based on recommendations of the Special Review Committee.

#### IV. Timeline for Special Review

- A. 2-4 weeks prior to first meeting:
  1. DIO will notify program of Special Review and will work with coordinators to schedule initial meeting of Special Review Committee
  2. GME Staff will prepare documents requested by Special Review Chair for committee review
  3. Special Review Committee Chair will develop an agenda and list of invitees to be interviewed at initial meeting
- B. 1-2 weeks prior to meeting:
  1. GME Staff will distribute documents and meeting agenda to Special Review Committee members
  2. Program Coordinator will confirm participants' attendance
- C. At the Initial Meeting:
  1. The special review committee will meet to discuss the agenda, the plan of action and the documentation provided by the GME Staff.
  2. The special review committee will develop interview questions.
- D. At Second Meeting:
  1. Interviews to be held with Residents (at least one peer selected representative per PGY level)
  2. Interviews to be held with Faculty
  3. Interviews to be held with Program Director
  4. Review of Pertinent Documents
  5. Wrap up
- E. During the 2 weeks preceding the next GMEC Meeting:
  1. Special Review Committee meets to discuss interviews, documents reviewed, overall program quality, level of ACGME compliance, and will develop recommendations for presentation to GMEC.
  2. Draft of Special Review Report to be shared with DIO, Program Director, and GME Chair
- F. At GMEC Meeting:
  1. Chair of Special Review Committee will present a summary of Special Review Committee's findings and recommendations for review and approval.
  2. Program Director must attend this meeting.
  3. Presentation should include:
    - a. Overall strengths of program
    - b. Areas that need improvement (including any areas of ACGME non-compliance)
    - c. Challenges impacting the educational program, including problems regarding financial or structural needs to be considered by the institution.
    - d. Concerns that may need special consideration by the GMEC
- G. At Subsequent GMEC Meetings:
  1. Final report with recommendations to be filed in GME Office
  2. Program Director to report on progress regarding Action Plan
  3. Special Review Chair to make recommendations to GMEC on progress on Action Plan and possible closure of special review