Standard Title:	Policy on Non-Accredited Fellowships, Including Non-Standard Training (NST)
Owner:	
Department:	GME
Origination Date:	August 4, 2006
Last approved date:	June 16, 2023
Approved By:	Graduate Medical Education Committee

I. Scope

This standard was developed for SIU Medicine. SIU Medicine collectively applies to the SIU School of Medicine (SIU SOM), including the Federally Qualified Health Center (FQHC), and SIU HealthCare (SIU HC). These entities are collectively referred to as SIU in this document.

This document applies to SIU staff, faculty, trainees, agents, officers, directors, interns, volunteers, contractors, and any other individual or entity engaged in providing teaching, research and health care items and services at SIU. These individuals are collectively referred to as SIU personnel in this document.

II. Definitions

Non-Accredited Program: Formal Training Program that is not offered accreditation by the ACGME.

Non-Standard Training (NST) Program: Clinical training for foreign national physicians in advanced subspecialty programs for which there is no Accreditation Council for Graduate Medical Education (ACGME) accreditation or American Board of Medical Specialties (ABMS) Member Board certification.

NST Trainee: A physician in an NST program who holds a J-1 visa sponsored by the Educational Commission for Foreign Medical Graduates (ECFMG). Trainee may also be referred to as "fellow".

Institutional Recognition: An ACGME process for approval of ACGME-accredited Sponsoring Institutions to conduct NST programs. Institutional Recognition is distinct and separate from ACGME accreditation processes.

Linked Program: The accredited residency/fellowship program most closely related to the specialty/subspecialty of the proposed non-accredited program. All non-accredited fellowships must be linked to an ACGME accredited program.

III. Purpose

Non-Accredited formal programs, whether or not they have NST trainees enrolled, are subject to GMEC oversight. Trainees in these programs are acknowledged by the GMEC and afforded the same rights and responsibilities as fellows in accredited programs. NST programs shall, in addition, be in compliance with Recognition Requirements for Sponsoring Institutions with Non-Standard Training Programs.

IV. Procedure

The GMEC must review and approve any changes in training complement, major changes in program length or structure, or appointment of a new Program Director. Each non-accredited program will undergo a periodic internal review. Whenever possible, this will occur at the same cycle as the Linked Program.

For GMEC approval of a new non-accredited program, the following information is required:

1. Description of Training -
    a. Scope of sub-specialty, length of training, and number of fellows.
    b. Is the fellowship accredited by any Specialty Society or other body?
    c. List the Linked Program.
    d. List all clinical training sites. NST programs may only utilize recognized Participating Sites of the Linked Program.

2. Educational rationale for the proposal:
    a. Please describe the specific Values, Goals and Strategic Objectives of the SIU SOM Strategic Plan that would be served by this fellowship. Explain how they would be served.
    b. What impact would this fellowship have on other programs within the institution? Please be specific:
        i. Must provide Letter of Support from PD of the Linked Program. The letter must address any case or procedural requirements that are shared by other SIU programs and the plan for how this would be managed.
        ii. Does this fellowship require clinical rotations outside of your specialty? If yes, you must verify with those services that they have capacity to provide for additional trainees.

3. Eligibility Criteria
    a. Medical school requirements (LCME accredited, AOA accredited, WHO recognized, etc.)
    b. Pre-requisite training requirements (residency or residencies completed, Board eligible or Board certified, etc.)
    c. Visa requirements if applicable (employing hospitals support J-1 visas only)
    d. Licensure Requirements (permanent or temporary IL license)

4. Leadership Team and faculty
    a. Name of Program Director (At a minimum, must be board certified or possess equivalent qualifications in specialty/subspecialty if board certification is not available and be an active faculty member in the Linked Program. Program may specify additional qualifications.)
    b. Name of Program Coordinator
    c. List all supervising faculty

5. Educational Curriculum
    a. Goals and Objectives of the Program
    b. Responsibilities for patient care and patient management Procedural Experience Requirements
    c. Research Requirements
    d. Rotation Schedule
    e. Didactics/Conference Schedule
    f. Mechanism for making the curriculum and graduation requirements available to fellows and faculty

6. Assessment
   a. Describe process and schedule for fellow assessment and mechanism for granting progressive autonomy. NST Programs must include process and instruments for initial competence assessment, including an ACGME Milestones assessment of the Linked Program milestones.
   b. Provide all Evaluation/Competency Assessment tools and instruments, including instrument for semi-annual review of performance.
   c. Provide copy of the Final Summative evaluation instrument.

7. Provide the following program specific policies:
   a. Clinical and Educational Work Hours Policy (must be consistent with ACGME work hour requirements)
   b. Supervision Policy (must be consistent with SIU Supervision Policy and NST supervision requirements) NST Programs must include statement that a supervising faculty member must be physically present to supervise the fellow until the PD has documented their ACGME Milestones achievement as a sufficient basis for delegating progressive authority and responsibility and conditional independence.
   c. Promotion policy, if program is more than 1 year in length
   d. Parental Caregiver and Medical Leave (PCML) policy
   e. Mechanism for fellow to confidentially evaluate the faculty and the program.
   f. Mechanism for fellow to raise concerns and provide feedback as confidentially as appropriate and without fear of intimidation or retaliation.

8. Funding source
   a. Must include, at a minimum, Stipend, Benefits and Malpractice and any applicable annual ACGME NST fees.
   b. Fellowships funded via SIU Medicine must also involve SIU HR for SIU appointment. If any or all of the funding comes from industry, the funds must be granted to SIU and must be disbursed in accordance with the SIU Industry Relations Policies.
   c. If fellow is not on a hospital contract, the contract must be approved by the DIO to ensure ACGME requirements are met] and the program must describe the mechanism by which the fellow is made aware of this.
   d. Both the program and fellow must agree to abide by all GMEC policies and procedures regarding graduate medical education.
   e. If this is a hybrid fellowship (functioning part of the time as fellow and part of the time as a faculty member):
      i. Outline how nursing staff, patients, residents and others will be able to identify when the fellow is functioning in either role.
      ii. Outline your mechanism to make SIU Medicine Billing and Compliance aware of which CPT codes the Fellow may (or may not) bill independently.

For ongoing approval of NST programs, the following is required:

The GMEC must complete and document an annual assessment of:
a. The supervision and assessment of NST trainees.
b. The impact of NST programs on accredited programs.

Initial and Formative Assessment Requirements:
a. No later than three months from the fellow's matriculation the PD must complete an initial competence assessment, including an ACGME Milestones assessment of the Linked Program milestones.
b. A supervising faculty member must be physically present to supervise the fellow until the PD has documented their ACGME Milestones achievement as a sufficient basis for delegating progressive authority and responsibility and conditional independence.
c. PD must meet with the fellow to review semi-annual performance.
d. PD must provide a summative evaluation for each fellow upon completion of or separation from the program.

V.   References

VI.   Attachments
NST Recognition Requirements

VII.   Periodic Review

VIII.   Reviewed by

IX.   Office of Responsibility
GME