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	GRADUATE MEDICAL EDUCATION COMMITTEE POLICY		<i>Effective Date</i>	2/24/04
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I. PURPOSE


The purpose of this Policy is to support the physical and emotional well-being of the residents in programs sponsored by The Johns Hopkins University School of Medicine (“Programs”), promote an educational environment, and facilitate patient care. These procedures have been developed to regularly monitor resident duty hours for compliance with this Policy and the ACGME Institutional and Program Requirements.

II. POLICY

Effective July 1, 2003, resident work schedules will be in compliance with the ACGME requirements. Note, some more restrictive work hour requirements have been set by various RRCs for an entire specialty or rotation. These more restrictive requirements must then be followed, *e.g.* Internal Medicine, Emergency Medicine, Anesthesiology, etc.

A. The common ACGME requirements (“Common Requirements”) are as follows:

1. The scheduled work week shall not exceed 80 hours per week, averaged over a four-week period, inclusive of in-house call activities.
2. Residents must be provided with 1 day in 7 free from all educational and clinical responsibilities, averaged over a four-week period, inclusive of call. One day is defined as one continuous 24-hour period free from all clinical, educational, and administrative activities.
3. Adequate time for rest and personal activities must be provided. This should consist of a 10-hour time period provided between all daily duty periods, and after in-house call.
4. In-house call must occur no more frequently than every third night, averaged over a 4-week period. In-house call is defined as those duty hours beyond the normal work day when residents are required to be immediately available in the assigned institution.
5. Continuous on-site duty, including in-house call, must not exceed 24 consecutive hours. Residents may remain on duty for up to 6 additional hours to participate in didactic activities, transfer care of patients, conduct outpatient continuity clinics and maintain

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continuity of medical and surgical care. No new patient may be accepted after 24 continuous hours on duty. A new patient is defined as any patient for whom the resident has not previously provided care.

- B. Each Program sponsored by The Johns Hopkins University School of Medicine shall develop and implement appropriate duty hour policies, compliant with the Common Requirements as well as each Program's specific Program Requirements. The more restrictive work hour requirements (whether it is the Program Requirements or the Common Requirements) shall be followed.

III. SCOPE


This policy applies to all residents (and fellows) participating in a graduate medical education training program sponsored by The Johns Hopkins University School of Medicine.

IV. RESPONSIBILITIES


The Chairpersons of all Clinical Departments, the Chiefs of all Clinical Divisions and the Program Directors must ensure that the scheduling of all residents, including fellows, complies with the above criteria.

V. PROCEDURE

- A. The Program Directors are responsible for monitoring resident (and fellow) working hours with oversight from the GMEC. Each Program must conduct monthly surveys (for the rest of this academic year (2003-2004) and thereafter quarterly) and document to the GMEC that the Program is in compliance. The Program shall conduct surveys accounting for work hours residents (and fellows) spend at all training sites, including internal moonlighting activities, if permitted by the resident's Program. In addition, each Chairman/Program Director shall report at the GMEC meetings regarding any issues relating to resident work hours in each Program. The following procedure shall be followed:
1. Monthly (for the rest of this academic year (2003-2004) and thereafter quarterly) all residents in every Program are surveyed for a 2-week period.

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2. Program Directors complete a Summary Form (see **Addendum 1**) and submit to the GMEC which indicates areas of compliance, or noncompliance with a plan of correction.
- B. In order to provide appropriate responses to non-compliance with duty hours requirements, complaints from residents (or fellows) shall be brought to the Program Director, Chairperson/Chief, faculty, or GME Compliance Office. Upon receipt of a complaint, a thorough investigation will be conducted and corrective measures implemented, as appropriate.
- C. If a Program requests an exception in the weekly limit on duty hours up to 10 percent or up to a maximum of 88 hours, the Program Director must submit such request to the GMEC which must review and endorse such request prior to submission of such request to the RRC.
1. All requests for duty hours exception shall be made in writing by the Departmental Chairperson and residency training Program Director and submitted to the GMEC.
 2. The requesting Program must be in good standing (*i.e.*, without a warning or a proposed or confirmed adverse action) with the ACGME and respective RRC.
 3. The following are issues that shall be addressed when requesting an exception to the ACGME 80-hour work hour rule from the Johns Hopkins University Graduate Medical Education Committee.
 - a. Describe the unique educational activities in the residency program that require additional hours. Permitted examples might be monthly Saturday conferences, attendance at an occasional weekend seminar, etc. Exemptions will not be granted for routine educational conferences, e.g., attendance at mandatory Thursday morning conference, because these activities should be part of the 80- hour house officer experience. Explain how these unique activities will improve the didactic experience for residents.
 - b. Describe the unique or unpredictable clinical activities that arise in which resident participation is desirable from a training perspective. Permitted examples might be rare surgical cases or rare emergent conditions in which resident participation in management would be critical for education. Exemptions will not be granted to allow resident participation in operative cases scheduled in the evening because of OR inefficiency. Explain how these unique


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clinical activities will improve the clinical education of the resident.


- c. Describe the mechanism to monitor the experiences of each of the residents during these additional hours. This mechanism should include documentation and tracking of the number of exceptions, the number of hours for each exception, and the reasons for each exception.
 - d. Describe faculty development activities regarding the effects of resident fatigue and sleep deprivation.
 - e. Describe how the Program will monitor, evaluate, and ensure patient safety with extended resident work hours
 - f. Project whether the additional hours will be experienced infrequently, often or almost always. Explain the rationale for this prediction.
 - g. Describe any other circumstances that support a finding that the additional hours are necessary for a more meaningful educational experience for residents.
4. The GMEC will review each request and provide a documented written statement of approval or denial of the request.
 5. Approval will only be given for exceptional situations.

VI. CONTROLS

The GME Compliance Office will periodically review resident work schedules to ensure compliance with this policy. GMEC will gather information on each program on a monthly basis for the rest of the academic year and thereafter on a quarterly basis and report to the Johns Hopkins Medicine Board of Trustees annually or more frequently as necessary.

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GMEC Approval Date	Chair, GMEC

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ADDENDUM 1: SUMMARY FORM

**Resident Work Hours
Program Compliance Survey**

Department Name:	[Month/Quarter]
Reviewed by Program Director:	
Print Name:	Signature:

GENERAL INFORMATION

1. Provide the dates of the two-week period that you used to track resident work hours.

2. What documentation do you have as back-up for the survey (e.g., eValue reports, sign-in sheets, time-sheets, schedules, PagerBox reports, etc.)

3. Did you track all house staff and rotators on your service during this two-week period? (circle appropriate response)

YES NO *if no, explain*


_____ (e.g., no rotators on service)

4. Did you track all house staff rotating at other training sites (e.g. participating institutions) during this two-week period? (circle appropriate response)

YES NO *if no, explain*

_____ (e.g., no rotators at other training sites)

FINDINGS (circle appropriate response including accounting for internal moonlighting activities)

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1. Did house staff work 80 hours or less per week? YES NO
2. Were assigned work periods 24 (+6) hours or less? YES NO
3. Did house staff have at least 10 non-working hours between shifts? YES NO
4. Did house staff have at least one 24-hour period of non-working time per week?
YES NO
5. Did in-house call occur no more frequently than every third night? YES NO

If the answer to any of the above questions was **NO**, please submit the plan of correction to be implemented (please use the back of this form or attach additional sheets as necessary).

RETURN COMPLETED COMPLIANCE SUMMARY FORMS TO GME Compliance Office.