

# University of Colorado School of Medicine

## Graduate Medical Education

Policy: <b>Non-ACGME Accredited Fellowships Policy</b>		
Original Approval: 4/16/2014	Effective date: 4/16/2014	Revision Date: Oct. 30, 2014 (Editorial) Feb. 10, 2017 May 22, 2017 (Editorial) Nov. 6, 2019 (Editorial) November 15, 2023 September 18, 2024 March 19, 2025 (Editorial)

### Purpose

- A. The intent of this policy is to promote the educational quality of the University of Colorado School of Medicine training programs, comply with regulatory requirements, ensure that new programs do not compete or take cases from existing accredited programs, and ensure institutional support for trainees in these programs that are appointed as:

**Primary appointment as a GME Fellow:** Will receive stipends, benefits, and professional liability coverage by GME. All trainees requiring J1 Visa sponsorship must have this appointment type. A grant or medical board may also require this appointment type.

**Primary appointment as a GME Fellow with a secondary appointment as an Instructor/Fellow in the fellow's sub/specialty department:** Will receive stipends, benefits, and professional liability coverage by GME. Must have this appointment type if moonlighting at University of Colorado Hospital or Children's Hospital Colorado to be covered under the Faculty Trust Malpractice Policy. Secondary Instructor/Fellow appointments are facilitated by the fellow's sub/specialty Department Administrator and Faculty Affairs.

**Primary appointment as an Instructor/Fellow in the fellow's sub/specialty department (otherwise considered faculty):** Stipends and benefits are not facilitated by the GME Office. Instructor/Fellow appointments are facilitated by the fellow's sub/specialty Department Administrator and Faculty Affairs.

- B. Oversight for non-ACGME accredited programs by GMEC is necessitated by the policies of the following national organizations and required by the University of Colorado School of Medicine Dean's Office including the Senior Associate Dean for Education:
1. [Accreditation Council for Graduate Medical Education \(ACGME\): Common Program Requirements III.D](#) - *Appointment of fellows and other learners (including, but not limited to, residents from other specialties, subspecialty fellows, PhD students, and nurse practitioners) in the program must not interfere with the appointed residents' education. The program director must report the presence of other learners to the DIO and GMEC in accordance with sponsoring institution guidelines.*
  2. [Educational Commission for Foreign Medical Graduates \(ECFMG\) Requirement for Non-Standard Training](#) - The ECFMG defines non-standard training as "an advanced

# University of Colorado School of Medicine

## Graduate Medical Education

*clinical subspecialty discipline or pathway for which there is no ACGME accreditation and/or ABMS member board certification available.” Programs seeking to enroll foreign nationals requiring J-1 visa sponsoring in non-standard training must meet the criteria as defined by ECFMG.*

3. [National Residency Match Program \(NRMP\)](#): Institution User Guide Pg. 16 - *The NRMP Institutional Official must attest to oversight responsibility for non-ACGME-accredited fellowships to indicate that unaccredited programs are under the institution’s governance or that an affiliation agreement exists.*

### **Policy**

- C. All proposed non-ACGME accredited programs must be approved by GMEC. GMEC will not approve requests for new non-accredited programs for which ACGME accreditation is available unless completion of the program will not lead toward ABMS board certification.
  1. If ACGME accreditation becomes available for an established non-ACGME accredited program, the program must promptly apply for ACGME accreditation if [ABMS board certification](#) is available in the subspecialty.
  2. In addition to GMEC approval, programs are encouraged to apply for external recognition and/or oversight if there is a specialty organization offering this oversight. For example, the United Council for Neurologic Subspecialties, American Association for Bronchology and Interventional Pulmonology (AABIP), or the Association of University Professors of Ophthalmology (AUPO).
- D. Non-ACGME Fellowship Programs offered at the University of Colorado must meet the minimum program requirements as indicated on the Application for GMEC Sponsorship of New Fellowship Program (Non-ACGME).
- E. Similar to accredited programs, non-ACGME accredited programs must obtain GMEC approval in order to:
  - Apply for initial program approval and GME-sponsorship
  - Increase the resident complement
  - Appoint a new Program Director or Associate Program Director
  - Add or remove a site
  - Make changes in program length or structure
  - Bring J-1 visa holders into their program (requires GMEC approval of program as an ACGME-sponsored Non-Standard Training Program)
- F. Education Agreement: All non-ACGME accredited programs with fellows who have a primary appointment through the GME Office must maintain Program Letters of Agreement with participating training sites to ensure educational and risk management oversight. See PLA Policy for more information.
- G. Billing Requirements: Non-ACGME Fellows with a primary appointment through the GME Office may bill for professional fees provided the fellow receives GME

# University of Colorado School of Medicine

## Graduate Medical Education

approval for moonlighting. Moonlighting approval is not required if the fellow's primary appointment is an Instructor/Fellow. See Moonlighting Policy for more information.

- H. All non-ACGME accredited programs must maintain compliance with relevant [GME Policies](#) (as indicated below), as well as those of the CU SOM and other statutory policies, rules, or regulations.

Additional Pay for Additional Work Policy*	Prescriptions: Residents Writing for Staff, Family & Friends Policy
Concern/Complaint Policy	Professionalism Policy*
Disaster Policy	Professional Review Process for Residents*
Drug Screen Policy*	Program Expenses Paid by GME*
Educational Funds*	Program Coordinator FTE Support
Eligibility and Selection Policy*	Program Director Qualifications, Appointment & Approval
Evaluation & Promotion Policy*	Program Letter of Agreement (PLA) Policy*
Funding Source Requirements Policy*	Program Size and Closure Policy*
GME Residents Performing Telemedicine Policy*	Quality Improvement/Patient Safety*
International Residency Rotations Policy*	Remediation, Disciplinary Action, & Grievance Policy
Leave Policy*	Stipend Policy*
Medical Records Policy*	Supervision Policy
Moonlighting Policy*	Transitions of Care (Structured Patient Handoffs) Policy
Non-Compete Policy	GME USMLE, COMLEX, LMCC Examinations Policy*
Physician Well-being and Impairment Policy	Work & Learning Environment Policy

\* indicates policies that do not apply to the appointment type Instructor/Fellows (otherwise considered Faculty). Instructor/Fellows are also subject to the policies and procedures established by [Faculty Affairs](#) pertaining to Faculty.

\*\*Clinical and Educational Work Hours Policy: Trainees in Non-Standard Training (NST) programs are subject only to the 80 hours per week and One Day in Seven Days Free requirements.

### **Process**

- I. Programs wanting to apply for GMEC recognition must reach out to the Accreditation and Compliance team for guidance and required forms.