Policy 3.200 Graduate Medical Education Committee
Section Resident/Fellow Support/Conditions for Appointment
Subject Clinical and Educational Work Hour Oversight
Policy Requirements ACGME Institutional: 3.2.e; 4.3.a.12; 4.11 ACGME Common: 6.12.; 6.20 -28
Version History Last Revision: 11/2022 Current Version: 9/2025 Legal Review: 10/2022

Purpose

To ensure effective oversight of institutional and program-level compliance with Accreditation Council for Graduate Medical Education (ACGME) clinical and educational work requirements.

Policy

Each Program Director (PD) must establish, distribute and implement formal written policies and procedures governing the clinical and educational work environment for residents/fellows, which comply with this institutional Graduate Medical Education Committee (GMEC) policy and the ACGME Common and Specialty-specific Program Requirements. Programs must be committed to and responsible for promoting patient safety and resident/fellow well-being in a supportive educational environment. The learning objectives of the program must not be compromised by excessive reliance on residents/fellows to fulfill non-physician service obligations.

The Sponsoring Institution (SI), through this policy, informs the Graduate Medical Education (GME) community that the offense of negligent homicide, Arkansas Code § 5-10-105, includes operating a vehicle while fatigued. **(1)** "Fatigued" means: **(A)** Having been without sleep for a period of twenty-four (24) consecutive hours; or **(B)** Having been without sleep for a period of twenty-four (24) consecutive hours and in the state of being asleep. Residents/fellows are encouraged to rest on campus before operating a vehicle if they are at increased risk of an accident due to fatigue.

Clinical and Educational Work Hour Oversight

Programs will comply with resident/fellow clinical and educational work hours and definitions as set forth in the applicable Program Requirements. Programs will adjust schedules as necessary to mitigate excessive service demands and/or fatigue. Moonlighting is addressed in GME policy 3.300. Supplemental Clinical Activity is addressed in GME policy 3.310.

Programs will monitor clinical and educational work hours with a frequency to ensure compliance with ACGME requirements.

The SI will monitor clinical and educational work hours annually and address areas of non-compliance in a timely manner.

The GMEC shall monitor compliance with this policy through:

a. Annual ACGME Survey of residents/fellows;
b. Special Review Process for underperforming programs;
c. Requests for work hour exceptions;
d. ACGME notification letters; and,
e. Annual mandatory work hour monitoring period.

Concerns regarding excessive service demands and/or fatigue can be raised using any of the steps found at the UAMS GME Website: https://medicine.uams.edu/gme/residents/resident-resources/raising-concerns-and-addressing-problems/

Clinical and Educational Work Hour Exceptions

ACGME Program Review Committees (RC) may grant exceptions for up to 10 % or a maximum of 88 hours to individual programs based on a sound educational rationale. The GMEC must review and formally endorse the exemption prior to submission to the RC according to the following procedures:

1. The PD must submit a written request for an exemption to the GMEC Chair. The request must clearly document the following:
    a. **Patient Safety:** Information must be submitted that describes how the program and institution will monitor, evaluate, and ensure patient safety with extended resident/fellow work hours.
    b. **Educational Rationale:** The request must be based on a sound educational rationale, which should be described in relation to the program's stated goals and objectives for the particular assignments, rotations, and level(s) of training for which the increase is requested. Blanket exceptions for the entire educational program should be considered the exception, not the rule.
    c. **Moonlighting Policy:** Specific information regarding the program's moonlighting policies for the periods in question must be included.
    d. **Supplemental Clinical Activity:** Specific information regarding the program's supplemental clinical activity policies for the periods in question must be included.
    e. **Call Schedules:** Specific information regarding the resident/fellow call schedules during the times specified for the exception must be provided.
    f. **Faculty Monitoring:** Evidence of faculty development activities regarding the effects of resident fatigue and sleep deprivation must be appended.
2. The PD will present the request in person to the GMEC for discussion.
3. If approved by the GMEC, the Designated Institutional Official (DIO) or the GMEC Chair will provide a documented written statement of institutional endorsement of the proposal.
4. The PD must submit the request to the RC according to ACGME Policy 26.00, the Policy for Granting Rotation-Specific Clinical and Educational Work Hour Exceptions found in the *ACGME Manual of Policies and Procedures.* The proposal to the RC must include a copy of this policy (which contains the institution's written procedures and criteria for endorsing requests for an exception to the work hours limits) and the current accreditation status of the program and of the SI.