

## ACGME Requirements Review and Comment Form

Title of Requirements	Institutional Requirements
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Organizations submitting comments should indicate whether the comments represent a consensus opinion of its membership or whether they are a compilation of individual comments.

<b>Select [X] only one</b>	
Organization (consensus opinion of membership)	
Organization (compilation of individual comments)	X
Review Committee	
Designated Institutional Official	
Program Director in the Specialty	
Resident/Fellow	
Other (specify):	

Name	Maryl Kreider, MD, MS
Title	President
Organization	Association of Pulmonary and Critical Care Medicine Program Directors

As part of the ongoing effort to encourage the participation of the graduate medical education community in the process of revising requirements, the ACGME may publish some or all of the comments it receives on the ACGME website. By submitting your comments, the ACGME will consider your consent granted. If you or your organization does not consent to the publication of any comments, please indicate such below.

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The ACGME welcomes comments, including support, concerns, or other feedback, regarding the proposed requirements. For focused revisions, only submit comments on those requirements being revised. Comments must be submitted electronically and must reference the requirement(s) by both line number and requirement number. Add rows as necessary.

	Line Number(s)	Requirement Number	Comment(s)/Rationale
<b>1</b>	181-184	<b>Requirement: I.B.4.a).(5)</b>	The APCCMPD supports the revised requirement to now ensure that institutional Graduate Medical Education Committees oversee the implementation of institutional policy(ies) for vacation and leaves of absence, including medical, parental, and caregiver leaves of absence. Further, the APCCMPD supports that these policies are reviewed annually.
<b>2</b>	385-389	<b>Requirement: III.A.</b>	The APCCMPD believes that faculty members must have the opportunity to raise concerns and provide feedback without intimidation or retaliation, and in a confidential manner. As such, that APCCMPD

	<b>Line Number(s)</b>	<b>Requirement Number</b>	<b>Comment(s)/Rationale</b>
			supports the revised requirement to include faculty members.
<b>3</b>	473 - 479	<b>Requirement #: III.B.6.d)</b>	The APCCMPD supports the revised requirement to include discrimination, sexual, and other forms of harassment.
<b>4</b>	602 - 604	<b>Requirement #: IV.B.3.a).(2)</b>	The APCCMPD supports the sharing of all institutional policies during the interview process so that applicants can make informed decisions. As such the APCCMPD supports the revised requirement to include the provision of polices related to vacation and leaves of absence, including medical, parental, and caregiver leaves of absence.
<b>5</b>	717 - 749	<b>Requirement: IV.H.1- IV.H.1.h</b>	The APCCMPD Supports the minimum requirements outlined in Requirement: IV.H.1- IV.H.1.h
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General Comments:

The APCCMPD appreciates the opportunity to comment on the proposed focused revisions to the ACGME Institutional Requirements.

**ACGME Institutional Requirements  
Summary and Impact of Focused Requirement Revisions**

**Requirement #: I.B.4.a).(5)**

Requirement Revision: [GMEC responsibilities must include oversight of:] ACGME-accredited programs' implementation of institutional policy(ies) for vacation and leaves of absence, including medical, parental, and caregiver leaves of absence, at least annually. <sup>(Core)</sup>

1. *Describe the Review Committee's rationale for this revision:*  
In June 2021, the ACGME Board of Directors approved actions to address recommendations from a task force report regarding medical, parental, and caregiver leaves of absence for residents and fellows in ACGME-accredited programs ("leaves" or "leaves of absence"). As part of this Board decision, the Institutional Review Committee (IRC) was asked to prepare a focused revision of Institutional Requirements that addresses guiding principles concerning leaves of absence. This revision addresses the Board's recommendation that Sponsoring Institutions have processes for overseeing compliance with policies and procedures for vacations and leaves of absence. Under this requirement, no information identifying individual residents or fellows who take leaves of absence would be provided to the Graduate Medical Education Committee (GMEC).
2. *How will the proposed requirement or revision improve resident/fellow education, patient safety, and/or patient care quality?*  
The requirement will improve resident/fellow education by enhancing oversight of ACGME-accredited programs' adherence to institutional policy(ies) concerning vacations and leaves of absence.
3. *How will the proposed requirement or revision impact continuity of patient care?*  
The proposed requirements are not expected to substantially affect the continuity of patient care. If there is any change, continuity of patient care will improve due to enhanced GMEC oversight of institutional policy(ies).
4. *Will the proposed requirement or revision necessitate additional institutional resources (e.g., facilities, organization of other services, addition of faculty members, financial support; volume and variety of patients), if so, how?*  
Sponsoring Institutions may identify opportunities to integrate this new responsibility into existing GMEC workflows, mitigating the need for additional administrative resources.
5. *How will the proposed revision impact accredited programs?*  
The GMEC will annually oversee programs' implementation of leave of absence policy(ies).

**Requirement #: III.A.**

Requirement Revision: The Sponsoring Institution and each of its ACGME-accredited programs must provide a learning and working environment in which residents/fellows and faculty members have the opportunity to raise concerns and provide feedback without intimidation or retaliation, and in a confidential manner, as appropriate. <sup>(Core)</sup>

1. *Describe the Review Committee's rationale for this revision:*  
Sponsoring Institutions must ensure that faculty members in ACGME-accredited programs have opportunities to raise concerns and provide feedback confidentially and without intimidation or retaliation.

2. *How will the proposed requirement or revision improve resident/fellow education, patient safety, and/or patient care quality?*  
The revision will improve resident/fellow education, patient safety, and patient care quality by ensuring appropriate opportunities for faculty members to communicate feedback or concerns.
3. *How will the proposed requirement or revision impact continuity of patient care?*  
The proposed revision is not expected to substantially impact the continuity of patient care. If there is any change, continuity of patient care will improve due to enhanced feedback from faculty members.
4. *Will the proposed requirement or revision necessitate additional institutional resources (e.g., facilities, organization of other services, addition of faculty members, financial support; volume and variety of patients), if so, how?*  
Sponsoring Institutions should assess existing resources for confidential communications to determine whether additional resources are needed.
5. *How will the proposed revision impact accredited programs?*  
ACGME-accredited programs share responsibility with Sponsoring Institutions to ensure that faculty members can raise concerns and provide feedback confidentially and without fear of intimidation or retaliation.

Requirement #: **III.B.6.d)**

Requirement Revision: The Sponsoring Institution must ensure that its ACGME-accredited program(s) provide(s) a professional, equitable, respectful and civil environment that is free from unprofessional behavior, including discrimination, sexual, and other forms of harassment, mistreatment, abuse and/or coercion of residents/fellows, other learners, faculty members, and staff members. <sup>(Core)</sup>

1. *Describe the Review Committee's rationale for this revision:*  
The requirement is revised for consistency with Common Program Requirement VI.B.6.
2. *How will the proposed requirement or revision improve resident/fellow education, patient safety, and/or patient care quality?*  
The revision improves resident/fellow education, patient safety, and patient care quality by specifying that discrimination and harassment are unprofessional and detrimental to clinical learning environments.
3. *How will the proposed requirement or revision impact continuity of patient care?*  
The proposed revision is not expected to substantially impact the continuity of patient care. If there is any change, continuity of patient care will improve due to enhanced institutional oversight of the clinical learning environment.
4. *Will the proposed requirement or revision necessitate additional institutional resources (e.g., facilities, organization of other services, addition of faculty members, financial support; volume and variety of patients), if so, how?*  
Sponsoring Institutions should ensure the commitment of resources needed to provide clinical learning environments that are free from discrimination and harassment.
5. *How will the proposed revision impact accredited programs?*  
The revision will enhance institutional oversight of ACGME-accredited programs.

**Requirement #: IV.B.3.a).(2)**

Requirement Revision: [An applicant invited to interview for a resident/fellow position must be informed, in writing or by electronic means, of the terms, conditions, and benefits of appointment to the ACGME-accredited program, either in effect at the time of the interview or that will be in effect at the time of the applicant's eventual appointments. Information that is provided must include:] institutional policy(ies) for vacation and leaves of absence, including medical, parental, and caregiver leaves of absence. <sup>(Core)</sup>

1. *Describe the Review Committee's rationale for this revision:*  
This revision addresses the ACGME Board's recommendation that institutional policy(ies) for vacations and leaves of absence should be available at all times.
2. *How will the proposed requirement or revision improve resident/fellow education, patient safety, and/or patient care quality?*  
The revision will improve resident/fellow education by enhancing the transparency of institutional policies concerning vacations and leaves of absence.
3. *How will the proposed requirement or revision impact continuity of patient care?*  
The proposed revision is not expected to substantially impact the continuity of patient care.
4. *Will the proposed requirement or revision necessitate additional institutional resources (e.g., facilities, organization of other services, addition of faculty members, financial support; volume and variety of patients), if so, how?*  
This new requirement may be addressed with existing institutional resources.
5. *How will the proposed revision impact accredited programs?*  
Programs should work with Sponsoring Institutions to ensure that institutional policy(ies) concerning leaves of absence are provided to prospective residents/fellows.

**Requirement #: IV.H.1 - IV.H.1.h)**

Requirement Revision: The Sponsoring Institution must have a policy for vacation and leaves of absence, consistent with applicable laws. This policy must: <sup>(Core)</sup>

provide residents/fellows with a minimum of six weeks of approved medical, parental, and caregiver leave(s) of absence for qualifying reasons that are consistent with applicable laws at least once and at any time during an ACGME-accredited program, starting the day the resident/fellow is required to report; <sup>(Core)</sup>

provide residents/fellows with at least the equivalent of 100 percent of their salary for the first six weeks of the first approved medical, parental, or caregiver leave(s) of absence taken; <sup>(Core)</sup>

provide residents/fellows with a minimum of one week of paid time off reserved for use outside of the first six weeks of the first approved medical, parental, or caregiver leave(s) of absence taken; <sup>(Core)</sup>

ensure the continuation of health and disability insurance benefits for residents/fellows and their eligible dependents during any approved medical, parental, or caregiver leave(s) of absence; <sup>(Core)</sup>

describe the process for submitting and approving requests for leaves of absence; (Core)

be available for review by residents/fellows at all times; and, (Core)

This policy must ensure that each of its ACGME-accredited programs provides its residents/fellows with accurate information regarding the impact of an extended leave of absence upon the criteria for satisfactory completion of the program and upon a resident's/fellow's eligibility to participate in examinations by the relevant certifying board(s). (Core)

1. *Describe the Review Committee's rationale for this revision:*  
This revision addresses specific ACGME Board recommendations regarding resident/fellow leaves of absence under the guiding principles.
2. *How will the proposed requirement or revision improve resident/fellow education, patient safety, and/or patient care quality?*  
The proposed requirements improve resident/fellow education by introducing new standards for institutional policy(ies) concerning medical, parental, and caregiver leaves of absence.
3. *How will the proposed requirement or revision impact continuity of patient care?*  
Continuity of patient care will be improved through enhanced institutional oversight of policy(ies) concerning resident/fellow leaves of absence.
4. *Will the proposed requirement or revision necessitate additional institutional resources (e.g., facilities, organization of other services, addition of faculty members, financial support; volume and variety of patients), if so, how?*  
Additional financial, clinical, and administrative resources may be needed to implement the proposed requirements for vacation and leave of absence policies.
5. *How will the proposed revision impact accredited programs?*  
ACGME-accredited programs are expected to adhere to institutional policy(ies) concerning resident/fellow leaves of absence.