


GME Policy #: I-D	Graduate Medical Education Policy & Procedures Pennsylvania Hospital	Page 1 of 7 Effective: 06-18-08
	Subject: Educational Affiliations: Rotations, Program Letters of Agreement and Master Affiliation Agreements	

POLICY

Pennsylvania Hospital of the University of Pennsylvania Health System (PAH) establishes affiliations with health care organizations within its region and beyond to enhance graduate medical education (GME) opportunities for its trainees. In entering into and maintaining such affiliations, the primary underlying principle is that these affiliations will be based on educational considerations, namely, that training experiences arranged under such affiliations will provide high quality experiences for PAH house staff. Educational affiliations will not be based on market competitive concerns among the various health care organizations.

All GME training programs sponsored by PAH must have the appropriate rotation agreements (master affiliation agreements, program letters of agreement (PLA)) (collectively referred to here as “rotation agreements”) in place for PAH residents rotating outside of PAH to participating institutions and for trainees in other institutions’ programs rotating into PAH.

“Rotation agreements” must be negotiated through the PAH Office of Graduate Medical Education and approved by the PAH Designated Institutional Officer (“DIO”). Such agreements with participating institutions must comply with ACGME common program requirements, the program specialty’s program requirements and must also meet PAH contractual expectations. The expectation includes that PAH-based residents rotating to a non-PAH site will have their salary, benefits and professional liability insurance provided by the non-PAH institution accepting the resident. Exceptions to this expectation may be made if the outside rotation is deemed critical to the PAH training program. PAH will determine on a case-by-case basis whether trainees rotating into PAH from another United States based training program will have their salary, benefits and professional liability insurance provided by the sending institution or by PAH. Consideration will be given to whether the trainees rotating from outside programs are deemed critical to patient care at PAH or to the PAH training program.

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PURPOSE

The purpose of this policy is to assure that the appropriate rotation agreements are in place to meet all ACGME standards, regulatory and PAH policy requirements.

SCOPE

This policy applies to all trainees of PAH sponsored accredited GME training programs seeking a non PAH training experience as well as any trainee from another United States based residency program seeking training at PAH.


IMPLEMENTATION

The implementation of this policy is the responsibility of the DIO, the Director of GME, Department Chairs and Program Directors.

PROCEDURE


I. Agreements

1. Consistent with the Policy statement above, a “rotation agreement” must be in place for any trainee from PAH rotating to another institution or for any non-PAH trainee from a United States based training program to rotate into PAH. All rotation agreements must be negotiated through the Office of GME and approved by the Executive Director.
2. The desirability of affiliations for educational purposes will be judged by the following factors:

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- The curricular needs of the relevant clinical/academic department, i.e., whether the experience provides required education not available at Penn and/or complementary or enriching experiences that enhance the overall educational experience.
 - A patient mix suitable for the educational experience, including types of patients and location, such as ICU, inpatient experience, or ambulatory experience. An overall patient volume adequate to the educational experience.
 - The quality of physician teaching, including the number of teaching physicians available and their level of commitment to educational activities. The institutional commitment to the educational program, including a work environment that appropriately incorporates house staff into the health care team; salary and administrative support; the development and implementation of a curriculum that meets educational needs; and an institutional dedication to curricular and faculty development.
3. In making decisions about educational affiliations, PAH recognizes that successful education requires adequate numbers and variety of patients, clinicians that are effective as teachers, and physical and financial resources.
 4. PAH is an ACGME-accredited sponsor of GME programs. Under the accreditation standards, as well as the requirements of the Joint Commission and other national boards, state and federal regulatory bodies, certain rules apply which govern the institution's process for accepting housestaff from training programs outside PAH who wish to visit this institution for the purpose of medical education.
 5. Any PAH house staff assignments to rotations at other institutions must meet the educational needs of the trainee, and must conform to institutional accreditation requirements regarding affiliation agreements. It is the responsibility of the Program Director to confirm sufficiently in advance that a current affiliation agreement exists with the other institution, and that ACGME standards including supervision, working hours, and safety are followed. Rotation agreements must be renewed at least every five years; if nothing in the agreement has changed at the end of the term, it is acceptable to add an amendment signifying review and extension of the agreement with duly authorized signatures.

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6. The ACGME has identified various levels of affiliation agreement, depending primarily upon the length of the experience and related factors. Generally, these agreements fall into the following categories:

- Master affiliation agreements (also referred to as institutional agreements) : written agreements between the sponsoring institution (PAH) and all major participating institutions/sites.
- Program letters of agreement (PLA): written agreements between each program and participating institutions/sites (as required by RRC program standards) that address GME responsibilities between the individual accredited program and the participating site where the housestaff receives a required part of their training. (Note: In the case of programs under master affiliation agreement, the elements of the PLA may be included as exhibits to the Master Affiliation Agreement).

7. The Office of GME works closely with program coordinators and/or program directors to determine which type of agreement is needed; to furnish the necessary paperwork (e.g., agreement templates); to review proposed agreements; to negotiate the agreements as necessary, and to ensure that agreements are approved and signed by the appropriate PAH officials. The process should be started no later than 90 days prior to the clinical educational experience except for special circumstances.

8. PAH trainees leaving PAH:

- a. PAH based residents rotating to a non-PAH site will have their salary, benefits and professional liability insurance provided by the non-PAH institution accepting the trainee. If the accepting institution does not agree to these terms, the DIO, Director of GME and a representative of the University of Pennsylvania Office of General Counsel will review the request to determine the level of professional liability risk involved in the rotation as well as the educational need for the experience by the PAH training program. Exceptions to this expectation may be made by the DIO if the outside rotation is determined to be critical to the PAH training program.

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- b. Program Directors and Chairs may appeal the decision of the DIO to the Executive Director of PAH.

9. Trainees rotating into PAH:


- a. PAH, acting through the Office of GME, will determine on a case-by-case basis whether trainees rotating into PAH from another United States-based training program will have their salary, benefits and professional liability insurance provided by the sending institution or by PAH. The DIO and a representative of the Office of General Counsel will review a request for PAH to bear the expenses in order to assess the level of professional liability risk involved in the rotation as well as the educational need for the experience by the PAH training program. Consideration will be given by the DIO as to whether the trainees from outside programs are deemed critical to patient care at PAH or to the PAH training program.

10. Major Participating Institution Master Affiliation Agreements:

Current master affiliation agreements for GME with major participating institutions must be negotiated by the Office of GME on behalf of PAH and must exist with all institutions/sites that have major participating rotations with PAH, consistent with ACGME standards.


A major participating site is defined by ACGME as an approved site to which all residents in at least one program rotate for a required educational experience, and for which a master affiliation agreement must be in place. To be designated as a major participating site in a two-year program, all residents must spend at least four months in a single required rotation or a combination of required rotations across both years of the program. In programs of three years or longer, all residents must spend at least six months in a single required rotation or a combination of required rotations across all years of the program. The term “major participating site” does not apply to sites providing required rotations in one year programs.

II. Process for Rotation

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1. Program Directors will report all rotation assignments to the Office of GME on a timely basis. The Office of GME will prescribe the form of the schedule and the amount of detail to ensure that proper reporting, e.g. for Medicare reimbursement, is accomplished.
2. While it is within the Program Director's discretion to allow electives, the primary justification should be to provide training experience not available in PAH. Clinical rotations may be arranged by individual training programs as a means of meeting ACGME program requirements and/or to supplement the training received here. Any member of the house staff may be asked to complete external rotations as a formal part of their training.
3. **Program Directors may not certify professional liability (malpractice) coverage for the resident's participation in an outside rotation.** Professional liability coverage is complex and must be addressed on a case-by-case basis through the PAH Office of General Counsel. The Office of GME will work with the Office of General Counsel to facilitate all decisions made concerning requests for professional liability coverage.
4. **For PAH House staff performing non PAH rotations:** House staff who request out-of-state rotations must determine whether or not they must obtain a medical license in the state where the rotation is to be performed. If a license is required, the trainee is responsible for obtaining the license before performing the rotation. Proof of appropriate licensure must be submitted to the Office of GME.
 - Verification of adequate malpractice insurance coverage is required for all off-site facilities. Arrangements should be verified through the Office of GME.
 - The Office of GME will notify ECFMG regarding the location of house officers with J-1 Visas.
5. **For non PAH visiting or rotating residents and fellows:**


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- Any United States physician in a GME program who wishes to come to PAH to do an elective rotation must comply with the following requirements at least 90 days in advance of starting the rotation.
- Requests must be made in writing to the department program director. Once approved the rotation form should be completed and forwarded to the Office of GME. Incomplete information will be returned to the training program for completion.
- A letter of agreement is required.
- Copy of Pennsylvania Medical Training or unrestricted license.
- No trainee is allowed to work or be present in any patient areas (patient floors, clinics or offices) without current licensure.
- Copy of current Curriculum Vitae.
- Copy of Malpractice Face Sheet or other proof of professional liability coverage showing coverage provided by their sponsoring institution.
- If the individual is from outside of the United States they must obtain and have the appropriate visa prior to beginning the rotation.
- Letter from Director of the Program in which they are currently enrolled or proof of good standing from the Office of GME at the hospital where they have their appointment.
- Employee Health Screening.
- Results of recent testing e.g. tuberculin skin testing, Measles, Mumps, Rubella, Varicella, Hepatitis B from their sponsoring institution.
- Satisfactory Criminal Background Check completed within 3 years of rotation, to PAH provided the individual has been continuously employed by the sponsoring institution and has remained matriculated in good standing in the sponsoring institution's training program.


III. Notifications

- The Office of GME will maintain copies of all affiliation agreements, addenda, and correspondence in PennTract (<http://PAHxnet.PAH.upenn.edu/pentract/>)

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- Education affiliations will be reviewed at the time of each program's internal review.
- As requested, the SOM Dean's Office and/or other PAH corporate offices will also be informed of all new affiliations and cancellations of affiliations.
- All matters pertaining to the financial aspects of rotations will be processed via the Office of GME and the corporate office of GME finance.
- **Questions about any aspect of affiliation agreements and/or clinical rotations into or out of PAH should be directed to the Office of GME well in advance of the anticipated beginning of those rotations.**

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