

St. David's South Austin Medical Center

Oversight of Individuals in a Graduate Education Program Policy

Approved:

Medical Executive Committee Meeting Date: 9/13/13 Rev: 4/12/19

Board of Trustees Meeting Date: 9/19/13 Rev: 4/18/19

Oversight of Individuals in a Graduate Education Program Policy

1. PURPOSE: To establish a Medical Staff process for the oversight and management of students who provide health care services as part of a written affiliation agreement between the Hospital and a graduate medical education program.

2. SCOPE: Individuals in a graduate professional educational program include “medical students,” “interns,” “externs,” “residents,” and “fellows” who are currently enrolled in a program approved by the Medical Executive Committee and the Board of Trustees.

3. POLICY:

- A. Before any participant in a graduate professional education program may have access to the Hospital for any purposes related to education or training, including but not limited to providing patient care with or without supervision, or observing, the individual must be approved by the Hospital as outlined in the Hospital’s Medical Student Policy.
- B. Individuals who wish to enter the facility as an “observer” but who is not part of an approved graduate professional educational program shall be subject to the Hospital’s “observer policy” or the Hospital’s “visitor policy” and may not function as a participant in a graduate professional educational program.
- C. The Hospital shall not approve any participant in a graduate professional education program unless the participant is in a US-accredited program for which the Hospital has entered into a formal affiliation agreement, and which has been approved by the Medical Executive Committee and the Board of Trustees.
- D. Individuals in a graduate educational program shall be credentialed by the sponsoring medical school, residency, or fellowship training program in accordance with the provisions in the written affiliation agreement and per the Hospital’s Medical Student Policy.
- E. In accordance with the written affiliation agreement, credentialing information shall be made available to the Hospital upon request and as needed by the Medical Staff in making any training assignments and in the performance of their supervisory function.
- F. The school or program shall provide a written description of the role, responsibilities, and patient care activities of participants in the training program.¹
- G. Individuals in a graduate professional educational program shall not be eligible for clinical privileges or medical staff membership, and shall not be entitled to any of the rights, privileges, or to the hearing or appeal rights as detailed in the Medical Staff Bylaws.
- H. In compliance with Federal laws, it will not be necessary to submit a query to the National Practitioner Data Bank prior to permitting individuals in a graduate professional educational program to provide services at this Hospital.

4. PROCEDURES:

¹ MS.04.01.01

A. Individuals in a graduate professional educational program may render patient care services at the Hospital only pursuant to, and limited by the following:

- 1) Individuals in a graduate professional educational program who have completed the basic level of training for licensure shall be licensed in this State and shall be limited by the applicable scope of practice and other professional licensure requirements of this State. Individuals in training for one licensure category shall not be permitted to work in a different licensure category unless licensed for the different category (e.g., a medical student or unlicensed foreign medical graduate may not be allowed to function as a physician assistant/PA unless licensed as a PA).
- 2) Licensed individuals in a graduate professional educational program who wish to have permission to prescribe or order controlled substances, with or without supervision, shall be required to have and maintain a current in-state DEA registration as an individual, and state controlled substance registration as an individual, as applicable. The Hospital's institutional DEA registration shall not be used by participants in a graduate professional educational program in lieu of individual DEA registration.
- 3) The written affiliation agreement between the Hospital and the sponsoring medical school or training program shall identify the individual or entity responsible for providing professional liability insurance coverage for individuals in a graduate educational program, in the amount of at least \$25,000 each claim and \$75,000 in aggregate or other demonstration of insurance as approved by the Hospital which shall include the Hospital as an additional insured.
- 4) The protocols or policies established by the Medical Executive Committee, in conjunction with the sponsoring medical school or training program regarding the scope of individuals in a graduate educational program authority (e.g., authority and circumstances under which they may write patient care orders and make entries in the patient record, subject to supervision and countersignature by a supervising LIP), mechanisms for the direction and supervision of individuals in a graduate educational program (e.g., mechanisms for the supervising LIP and the school's program director to make decisions about each individual in a graduate educational program progressive involvement and independence in specific patient care activities), and other conditions imposed upon individuals in a graduate educational program by the Hospital or the Medical Staff.²
- 5) While functioning in the Hospital, individuals in a graduate professional educational program must abide by all provisions of the Medical Staff Bylaws, Rules and Regulations, and Hospital and Medical Staff policies and procedures, and will be subject to limitation or termination of their ability to function at the Hospital at any time in the discretion of the Chief Executive Officer or the President of the Medical Staff. Individuals in a graduate educational program may perform only those services set forth in the training protocols developed by the applicable training

² MS.04.01.01

program to the extent that such services do not exceed or conflict with the Rules and Regulations of the Medical Staff or Hospital policies, and to the extent approved by the Board. Individuals in a graduate professional educational program shall be responsible and accountable at all times to a Member of the Medical Staff, and shall be under the supervision and direction of a Member of the Medical Staff who has been credentialed by the Medical School or Training Program to provide direct supervision. Individuals in a graduate professional educational program may be invited or required to attend meetings of the Medical Staff, Medical Staff Departments, Divisions, or committees, but shall have no voting rights.

- B. The Chief Medical Officer will be responsible for overseeing individuals in a graduate professional educational program and shall communicate to the Medical Executive Committee and the Board about the patient care provided by, and the related educational and supervisory needs of, the participants in the graduate professional educational programs, including demonstrated compliance with any residency review committee citations as applicable to the program.³
- C. Individuals in a graduate professional educational program are distinguished from Practitioners who, although currently enrolled in a graduate medical education program, provide patient care services independently at the Hospital (e.g., “moonlighting” or locum tenens coverage) and not as part of their educational program. Such Practitioners still attending a training program who provide independent services must meet the qualifications for Medical Staff membership and clinical privileges as provided in the Medical Staff Bylaws and shall be subject to the credentialing procedures specified in the Bylaws or Medical Staff policy in the same manner as a Practitioner seeking appointment to the Medical Staff.
- D. The Hospital’s affiliation with a graduate professional educational program shall be reviewed by the Medical Executive Committee and Board of Trustees periodically, and the continuation of the affiliation shall be subject to evidence of adequate performance by members of the faculty and students/participants, the needs of the Hospital’s patient population, and the Hospital’s continued capacity, capabilities and interest in serving as a clinical rotation site for the program.

Reference: St. David’s South Austin Medical Center Medical Student Policy

³ MS.04.01.01