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## COVID-19 Update: Pandemic implications for GME programs

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The COVID-19 pandemic is causing massive disruption and adjustment to patient care, including to hospitals' graduate medical education (GME) programs. Decisions about the operation of these programs need to consider the ACGME accreditation requirements and Medicare reimbursement rules.

Particular issues arising include:

- Furloughing of residents/fellows and GME staff. Though many hospitals have furloughed non-GME employees, the ACGME asserts that residents/fellows cannot be furloughed.
  - Sponsoring institutions must fulfill all institution GME policies and obligations under contracts for resident/fellow appointments, including salary, benefits, vacation, leave of absence, grievance procedures and due process.
  - Furloughs of other employees must not interfere with the sponsoring institutions' ability to ensure sufficient staffing and resources for GME administration and oversight of responsibilities for its programs.
- Continued adherence to ACGME institutional and program requirements. Despite widespread waivers by CMS, ACGME has continued to

require that sponsoring institutions and programs adhere to ACGME Institutional and Program Requirements, as well as policies concerning disasters, institutional and/or program closures, and withdrawal of accreditation. Sponsoring institutions are required to ensure educational continuity and fulfill obligations to residents/fellows under all circumstances, including when implementing new CMS temporary waivers and flexibilities during the public health emergency for:

- Residents working remotely and performing services within the scope of their approved residency program virtually from their home or a patient's home with appropriate physician supervision.
  - Presence of supervising physician requirements lessened to allow supervising physicians to be virtually available for supervision when appropriate.
  - Moonlighting now allowed for services furnished both related and unrelated to the scope of approved GME programs.
- Continued clinical competency disclosures for board certification eligibility
  - Appointment of early medical student graduates to matched and unmatched GME residency programs