

**HOD ACTION: Council on Medical Education Report 8 adopted as amended and the remainder of the report filed.**

REPORT OF THE COUNCIL ON MEDICAL EDUCATION

CME Report 8-A-13

Subject: The Changing Training Environment: Access to Procedural Training for Residents and Fellows  
(Resolution 328-A-12)

Presented by: Mahendr S. Kochar, MD, Chair

Referred to: Reference Committee C  
(A. Patrice Burgess, MD, Chair)

---

1 Resolution 328-A-12, The Changing Training Environment: Access to Procedural Training for  
2 Residents and Fellows, introduced by the Minnesota Delegation, Minority Affairs Section, and  
3 Nebraska Delegation and referred by the House of Delegates, asked that our American Medical  
4 Association (AMA):

- 5  
6 1. Study the trends in numbers of residency training sites that also employ mid-level  
7 providers and/or concurrently train students of these mid-level programs;  
8
- 9 2. Define a physician-in-training's role in the hospital and specifically make it a high  
10 educational priority for trainees to receive the needed exposure to procedures required for  
11 them to master competency in their specialty and that these exposures are not delegated to  
12 mid-level providers and mid-level provider trainees; and  
13
- 14 3. Study the financial impact for institutional training sites of hiring more mid-level providers  
15 versus investing in a physician training program.  
16

17 There was mixed testimony heard during Reference Committee C. While it is possible that the  
18 hiring of mid-level providers may have had an adverse effect or deprived medical students and  
19 residents in some needed training opportunities, their presence has also enhanced the education of  
20 students and residents and contributed to a better understanding of team-based care and  
21 coordination.  
22

## 23 BACKGROUND

24  
25 In July 2011, the Accreditation Council for Graduate Medical Education (ACGME) implemented  
26 new resident duty hour standards.<sup>1</sup> The standards retain the 80-hour limit per week (averaged over  
27 4 weeks) implemented by the ACGME in 2003, but reduce shift lengths for first-year residents to  
28 no more than 16 hours and set stricter requirements for duty hour exceptions. In addition, the  
29 standards specify in greater detail the levels of supervision necessary for first-year residents; set  
30 higher requirements for teamwork, clinical responsibilities, communication, professionalism,  
31 personal responsibility, and transitions of care; establish graduated requirements for minimum time  
32 off between scheduled duty periods; expand requirements regarding patient care hand-offs; and call  
33 for alertness management and fatigue mitigation strategies to promote continuity of patient care  
34 and resident safety.<sup>2</sup> Although Public Citizen has repeatedly called for the Occupational Safety and  
35 Health Administration (OSHA) to regulate resident physician duty hours,<sup>3</sup> AMA policy

1 (D-310.964) supports oversight and enforcement of resident/fellow physician duty hours by the  
2 ACGME and believes that the ACGME is the most appropriate body to regulate and monitor  
3 resident duty hours in the context of multiple other factors including supervision, professionalism,  
4 and patient care quality. The AMA Council on Medical Education continues to monitor the  
5 enforcement and impact of the ACGME duty hour standard as it relates to patient safety and the  
6 optimal learning environment for residents.

7  
8 The AMA also recognizes that institutions that sponsor residency training programs have found it  
9 difficult to maintain their net income, which has depended in part on revenue generated by resident  
10 service and Medicare-funded graduate medical education (GME) programs.<sup>4, 5</sup> The 1997 Balanced  
11 Budget Act capped the number of Medicare-funded GME positions at 1996 levels for almost all  
12 teaching hospitals.<sup>6</sup> While new US allopathic and osteopathic medical schools are opening and  
13 many medical schools are expanding their enrollments to meet the need for more physicians, core  
14 residency training programs are experiencing minimal growth due to limited federal funding.

15  
16 There is mounting concern about the ability of the health care profession to handle the expected  
17 surge in demand for health care services due to the passage of the Patient Protection and  
18 Affordable Care Act (ACA) (P.L. 111-148) and the projected shortage of physicians (including  
19 primary care, general surgeons, and many other specialties) in the near future.<sup>7, 8</sup> In that regard, the  
20 AMA has continued to collaborate with the Association of American Medical Colleges and other  
21 key stakeholders to advocate for GME funding and alert Congress that cuts to GME funding will  
22 jeopardize the ability of medical schools and teaching hospitals to train physicians, as well as limit  
23 critical services to patients.<sup>9</sup>

#### 24 25 EMPLOYMENT OF MID-LEVEL PROVIDERS

26  
27 Many resident physicians train at teaching hospitals where they provide complex and acute care for  
28 the underserved, indigent, and elderly. Restrictions on resident work hours and minimal growth in  
29 residency training positions have decreased patients' access to medical services provided by  
30 residents.<sup>10</sup> This has impacted the ability for resident physicians to provide the same amount of  
31 patient care as in prior years, and this gap has been offset by expanding the number of non-  
32 physicians to care for patients. Advanced practice nurses (APNs) and physician assistants (PAs)  
33 have assumed increasing responsibility and independence in a variety of health care settings and  
34 are making significant and important contributions to patient care. There is substantial variation in  
35 the allocation of their clinical services by specialty, geography, employment setting, and other  
36 factors. There are also considerable gaps in the data describing their distribution and participation  
37 compared to physicians.<sup>11</sup>

38  
39 Individual state licensing boards are responsible for ensuring, through licensure and certification,  
40 that health care professionals provide services commensurate with their training. The Joint  
41 Commission establishes medical staff and other credentialing procedures for non-physician  
42 practitioners in its Hospital Accreditation Standards. Hospitals can extend medical staff  
43 membership to APNs and PAs, and any other category of practitioner deemed eligible by the  
44 hospital so long as it complies with federal and state laws and accreditation standards. Current rules  
45 and regulations governing APN and PA qualifications, practice and prescription authority, and  
46 reimbursement vary greatly across states as well as in hospitals that may choose to exercise all the  
47 skills the law permits them to exercise or limit the privileges of independent practitioners.<sup>12</sup>

1     DEFINING THE “PHYSICIAN-IN-TRAINING” ROLE IN THE HOSPITAL

2  
3     The AMA’s role in defining the role of physicians-in-training is accomplished through AMA  
4     representation on the ACGME Board of Directors. The AMA and the appropriate medical specialty  
5     boards and specialty organizations also appoint about 6 to 15 volunteer physicians to the  
6     ACGME’s 28 Residency Review Committees (RRCs). The function of the RRCs is to establish  
7     accreditation standards and to provide a peer evaluation of residency programs and subspecialties  
8     (or, in the case of the Institutional Review Committee, to provide a peer evaluation of sponsoring  
9     institutions). This includes preparing or revising the Common Program, specialty specific and  
10    Institutional Requirements to reflect current educational and clinical practice. The RRCs also  
11    initiate discussion in matters of policy, best practice, and innovation relating to GME.<sup>13</sup>

12  
13    To maintain its accreditation, a medical training institution must establish how physicians will be  
14    trained to perform certain procedures. For example, the ACGME’s Program Requirements for  
15    GME in General Surgery (Int.B.) provide the Definition and Scope of the Specialty and state:

16  
17        The goal of a surgical residency program is to prepare the resident to function as a qualified  
18        practitioner of surgery at the advanced level of performance expected of a board-certified  
19        specialist. The education of surgeons in the practice of general surgery encompasses both  
20        didactic instruction in the basic and clinical sciences of surgical diseases and conditions, as  
21        well as education in procedural skills and operative techniques. The educational process must  
22        lead to the acquisition of an appropriate fund of knowledge and technical skills, the ability to  
23        integrate the acquired knowledge into the clinical situation, and the development of surgical  
24        judgment.<sup>13</sup>

25  
26    The ACGME currently has requirements in place that require residents to maintain a log of  
27    procedures that they are required to perform for their particular specialty. The RRCs are  
28    responsible for establishing the minimum number of procedures required, and residency programs  
29    are responsible for documenting that residents have performed a sufficient breadth of complex  
30    procedures to graduate qualified physicians. The ACGME also has requirements that prevent  
31    residents’ progression through training if they are not receiving adequate clinical experiences.<sup>13</sup>

32  
33    In July 2013, the ACGME will implement its next accreditation system (NAS) for 7 of the 26  
34    ACGME-accredited residency core specialties (emergency medicine, internal medicine,  
35    neurological surgery, orthopedic surgery, pediatrics, diagnostic radiology, and urology), and the  
36    remaining specialties and the transitional year will be implemented in 2014.<sup>14</sup> The RRCs in these  
37    specialties will begin to collect milestones (developmentally based, specialty-specific achievements  
38    that residents are expected to demonstrate at established intervals as they progress through training)  
39    data. The milestones that are being developed within the NAS will include a procedural  
40    competency as part of the evaluation. Under this new system, theoretically, residents should  
41    perform the procedure until the required level of competency is achieved, at which point having a  
42    mid-level provider perform this procedure would be less detrimental to the resident’s education. If  
43    the program cannot demonstrate that their residents are achieving competency in procedures, this  
44    would be noted in their evaluations.

45  
46    In addition to milestones, other data elements that will be reviewed annually include ACGME  
47    resident and faculty surveys and operative and case-log data. This ongoing data collection and  
48    trend analysis will allow the ACGME to base its accreditation in part on the educational outcomes  
49    of programs and enhance its ongoing oversight to ensure that programs meet standards for high-  
50    quality education and a safe and effective learning environment.<sup>14</sup>

1 DISCUSSION

2  
3 Residents and fellows learn while providing direct patient care in hospitals and clinics under the  
4 direct supervision of a teaching physician. While on duty, residents are the first-line contact for  
5 patient care issues and emergencies pertaining to patients on their service. Many types of residents  
6 (e.g., surgery, radiology, obstetrics, family medicine) also learn and perform surgical procedures  
7 under supervision and are engaged in the pre- and postoperative medical and surgical care of their  
8 patients.

9  
10 It is becoming common practice in some institutions to shift procedural work to mid-level  
11 providers as residents comply with new duty hour restrictions. APNs and PAs are being trained to  
12 perform operating room and bedside procedures such as placement of central lines, catheters,  
13 intracranial pressure monitors, etc. However, in some cases, limited training has been available to  
14 residents and fellows who need to become proficient at performing these procedures.<sup>15</sup>

15  
16 In its position statement to the Institute of Medicine, the American College of Surgeons states,  
17 “Optimum training of resident physicians, especially surgical residents, requires a longitudinal,  
18 comprehensive curriculum that focuses on the cognitive elements, technical skills, and judgment  
19 that are critical to providing safe patient care.” The ACS also states, “Achievement of expertise  
20 requires sustained deliberate practice, and retention of skills requires periodic reinforcement.”<sup>16</sup>

21  
22 It has been argued that less time spent in the hospital will ultimately lead to less experienced and  
23 less competent physicians than in the era preceding work-hour restrictions.<sup>17</sup> A recent longitudinal  
24 study showed that half of all general surgery interns felt that the duty hour changes have decreased  
25 their coordination of patient care (53%), their ability to achieve continuity with hospitalized  
26 patients (70%), and their time spent in the operating room (57%).<sup>15</sup>

27  
28 In another study among neurological surgeons, board certification test scores and levels of  
29 participation in national conferences declined after implementation of duty hour limits in 2003. The  
30 study also found that 96 percent of chief residents and residency program directors believed that  
31 the 80-hour limit had compromised resident training, and 98 percent believed that it had led to a  
32 decrease in surgical experience.<sup>10</sup>

33  
34 Published studies on the impact of duty hour restrictions on surgery residents’ ability to perform a  
35 sufficient number of surgical procedures to make them proficient and well qualified for  
36 independent practice are limited. Additional study is needed to evaluate the impact of reductions in  
37 duty hours on a physician’s ability to train and perform the necessary procedures established by the  
38 RRCs.

39  
40 RECOMMENDATIONS

41  
42 The Council on Medical Education recommends that the following recommendations be adopted in  
43 lieu of Resolution 328-A-12, and the remainder of this report be filed.

- 44  
45 1. That our American Medical Association (AMA) support the concept that procedural training is  
46 a critical portion of resident education and the augmentation of patient care by non-physician  
47 practitioners should not interfere with a resident’s ability to achieve competence in the  
48 performance of required procedures. (New HOD Policy)

- 1 2. That our AMA ask the Accreditation Council for Graduate Medical Education to evaluate the  
2 trend in the number of cases, and roles in these cases, of graduating residents since the  
3 implementation and revision of duty hour restrictions to determine whether duty hour standards  
4 may have adversely impacted residents' ability to participate in a sufficient number of cases to  
5 make them proficient and well qualified for independent practice, and that this information be  
6 used to further refine change in resident education under the Next Accreditation System.  
7 (Directive to take Action)

Fiscal Note: Less than \$500 to update policy

## References

1. ACGME Duty Hours. Accreditation Council for Graduate Medical Education. Available at: [www.acgme.org/acgmeweb/tabid/271/GraduateMedicalEducation/DutyHours.aspx](http://www.acgme.org/acgmeweb/tabid/271/GraduateMedicalEducation/DutyHours.aspx) (accessed 1-23-13).
2. American Medical Association. Council on Medical Education Report 2-I-09: resident/fellow duty hours, quality of physician training, and patient safety. Available at: [www.ama-assn.org/ama1/pub/upload/mm/377/cme-report-2i-09.pdf](http://www.ama-assn.org/ama1/pub/upload/mm/377/cme-report-2i-09.pdf) (accessed 1-31-13).
3. Public Citizen Letter to OSHA on Resident Work Hours. Available at: [www.citizen.org/documents/response-to-oshas-denial-of-resident-work-hours-petition-110311.pdf](http://www.citizen.org/documents/response-to-oshas-denial-of-resident-work-hours-petition-110311.pdf) (accessed 1-23-13).
4. Robertson, RG, Phillips RL, Cora-Branble D, Hobbs J, Kelley MA, et al. Enhancing Flexibility in Graduate Medical Education. Council on Graduate Medical Education Nineteenth Report, US Department of Health and Human Services. September 2007. Available at: [www.hrsa.gov/advisorycommittees/bhpradvisory/cogme/Reports/index.html](http://www.hrsa.gov/advisorycommittees/bhpradvisory/cogme/Reports/index.html) (accessed 11-14-12).
5. Direct Graduate Medical Education [BBA Section 1886 (h) (4) (E) of the Act, as added by section 9202 of the Consolidated Omnibus Budget Reconciliation Act (COBRA) of 1985 (Pub. L. 99-272)]. Available at: [http://www.cms.hhs.gov/AcuteInpatientPPS/06\\_dgme.asp](http://www.cms.hhs.gov/AcuteInpatientPPS/06_dgme.asp) (accessed 11-14-12).
6. Salsberg E, Rockey PH, Rivers KL, Brotherton SE and Jackson GR. US Residency Training Before and After the 1997 Balanced Budget Act. *JAMA*. September 2008;300(10):1174-1180.
7. The Impact of Health Care Reform on the Future Supply and Demand for Physicians Updated Projections through 2025. Association of American Medical Colleges Center for Workforce Studies. June 2010. Available at: [www.aamc.org/download/158076/data/updated\\_projections\\_through\\_2025.pdf](http://www.aamc.org/download/158076/data/updated_projections_through_2025.pdf) (accessed 2-4-13).
8. Recent Studies and Reports on Physician Shortages in the US. Association of American Medical Colleges. October 2012. Available at: [www.aamc.org/download/100598/data/recentworkforcestudies.pdf](http://www.aamc.org/download/100598/data/recentworkforcestudies.pdf) (accessed 1-23-13).
9. Tell Congress to preserve graduate medical education funding. Legislative Action Center. American Medical Association. Available at: <http://capwiz.com/ama/issues/alert/?alertid=62199646> (accessed 1-23-13).
10. Jagannathan J, Vates GE, Pouratian N, Sheehan JP, et al. Impact of the Accreditation Council for Graduate Medical Education work-hour regulations on neurosurgical resident education and productivity. *Journal of Neurosurgery*. 2009;110(5):820-827.
11. Developing an Open-Source Model for Projecting Physician Shortages in the United States. The Cecil G. Sheps Center for Health Services Research, UNC Chapel Hill. Available at: <http://www.healthworkforce.unc.edu/physicianmodel.html> (accessed 1-18-13).
12. The Role of Nurse Practitioners in Meeting Increasing Demand for Primary Care. National Governors Association. Available at: [www.nga.org](http://www.nga.org) (accessed 1-24-13).
13. Accreditation Council for Graduate Medical Education Policy and Procedures. Available at: <http://www.acgme-nas.org/assets/pdf/FinalMasterNASPolicyProcedures.pdf> (accessed 1-23-13).
14. Nasca TJ, Philibert I, Brigham T, et al. The Next GME Accreditation System – Rationale and Benefits. *N Engl J Med*. March 15, 2012;366(11):1051-1056.
15. Antiel RM, Reed DA, Van Arendonk KJ, Wightman SC, et al. Effects of Duty Hour Restrictions on Core Competencies, Education, Quality of Life, and Burnout Among General Surgery Interns. *JAMA Surg*. 2013.

16. Position of the American College of Surgeons on Restrictions on Resident Work Hours presented to the Institute of Medicine Consensus Committee. March 4, 2008. Available at: <http://www.facs.org/education/statement.pdf> (accessed 1-23-13).
17. Bath J, Lawrence P. Why we need open simulation to train surgeons in an era of work-hour restrictions. *Vascular*. August 2011;19(4):175-7.