

SUNY DOWNSTATE MEDICAL CENTER
GME POLICIES AND PROCEDURES



**SUNY
DOWNSTATE**
Health Sciences University

Office of Graduate Medical Education

University Hospital of Brooklyn
College of Medicine
School of Graduate Studies
College of Nursing
School of Health Related Professions
School of Public Health

SUBJECT: GME Policy on Program Closures and Reductions

Originating Department: Graduate Medical Education
Date Approved by GMEC: 12/18/2019
Original Date: 1/12/2011
Revisions: 9/16/2015, 12/18/2019.

In accordance with section IV.N., IV.N.1-2 of the ACGME institutional Requirements, the Sponsoring institution must have a policy that addresses GMEC oversight of reductions in size or closure of each of its ACGME-accredited programs, or closure of the Sponsoring Institution that includes the following: the Sponsoring institution must inform the GMEC, DIO, and affected residents/fellows as soon as possible when it intends to reduce the size or close one or more ACGME-accredited programs, or when the Sponsoring Institution intends to close; and, the Sponsoring Institution must allow residents/fellows already in an affected ACGME-accredited program(s) to complete their education at the Sponsoring institution, or assist them in enrolling in (an)other ACGME-accredited program(s) in which they can continue their education.

Purpose:

To establish a policy that addresses a reduction in size or closure of a residency or fellowship program or closure of SUNY Downstate Medical Center ("**SUNY Downstate**"), the Sponsoring Institution.

Definitions:

DIO: (Designated Institutional Official): The individual in a sponsoring institution who has the authority and responsibility for all of the ACGME-accredited GME programs.

GME Program or Program: a structured educational experience in graduate medical education designed to conform to the ACGME Program Requirements of a particular specialty/subspecialty.

GME Reimbursement Caps: Medicare reimbursement for teaching hospitals.

Participating Organization/Site: An organization providing educational experiences or educational assignments/rotations for residents/fellows. Examples of sites include: a university, a medical school, a teaching hospital which includes its ambulatory clinics and related facilities, a private medical practice or group practice, a nursing home, a school of public health, a health department, a federally qualified health center, a public health agency, an organized health care delivery system, a health maintenance organization (HMO), a medical examiner's office, a consortium or an educational foundation.

Sponsoring Institution: Consistent with the definition provided by the ACGME, the organization (or entity) that assumes the ultimate financial and academic responsibility for a program of GME. The sponsoring institution has the primary purpose of providing educational programs and/or health care services (e.g., a university, a medical school, a hospital, a school of public health, a health department, a

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public health agency, an organized health care delivery system, a medical examiner's office, a consortium, an educational foundation).

Policy:

- I. SUNY Downstate and Participating Organizations must inform the GMEC, the DIO, and the residents of affected Program(s) as soon as possible when the Institution and a Participating Organization, as applicable, intends to reduce the size of or close one or more Programs, or if SUNY Downstate or a Participating Organization, as applicable, intends to close.
- ii. SUNY Downstate and the Participation Organization(s) must either allow residents already in the Program(s) to complete their education or make every effort in good faith and working with the GME Program(s) to assist the residents affected by a proposed closure or reduction, to identify and enroll in an ACGME-accredited program(s) in which they can continue their education. All necessary documentation including assessment of competence, schedules of rotations completed, procedures privileged and any other assessments or records requested by an accepting program and/or required by ACGME, as well as Milestones evaluations and a final summative evaluation of the transferred resident(s) will be provided. Program Directors shall obtain review and approval of the DIO before submitting information or requests to the ACGME, in accordance with Common Program Requirements.
- III. Under the Medicare GME reimbursement rules, teaching institutions receive reimbursement for the costs incurred in the training of residents – direct graduate medical education (DGME) reimbursement and indirect graduate medical education (IME) reimbursement, which are limited by an institution's FTE caps (maximum numbers of residents eligible to be counted for GME reimbursement purposes. For trainees over an institution's cap, there is no GME reimbursement. The Medicare program has in its regulations certain provisions designed to provide relief from the FTE caps when a GME program closes, in order to incentivize potential receiving facilities to take in residents from the program (the "displaced resident" rules). When a program closes, an institution that accepts a displaced resident is entitled to receive a temporary increase in its FTE caps for the time necessary for the displaced resident to complete his or her training, provided that the originating institution agrees to a reduction in its own FTE cap that would correspond to the timeframe of the increase in FTE cap at the receiving facility (i.e., a zero-sum reimbursement situation.

To the greatest extent possible, the Institution and Participating Organizations supporting residents from Programs undergoing closure will agree to follow the displaced resident rules so that residents can be eligible for "displaced" status, and that potential receiving institutions can receive the temporary increases in their own GME reimbursement caps.
- IV. In the event of reduction of Program size, to the greatest extent possible, residents already in the Program will be allowed to complete the Program, and when feasible only future positions offered in the Program(s) will be reduced.
- V. If as the result of an Extraordinary Circumstance in which a Program or the Institution cannot provide at least an adequate educational experience for a Program's residents/fellows, the GME Administrative Support Disaster Response Policy will be followed.

Approved by the GMEC and DIO, effective 12/18/2019

Chairman of the GMEC

DIO