

# Policy on Monitoring and Reporting Duty Hours

Revised August 23, 2011

It is the policy of the Graduate Medical Education Committee to follow guidelines established by the ACGME regarding duty hours for residents in accredited training programs. Duty hours are defined as all clinical and academic activities related to the program; i.e., patient care (both inpatient and outpatient), administrative duties relative to patient care, the provision for transfer of patient care, time spent in-house during call activities, and scheduled activities, such as conferences. Duty hours do not include reading and preparation time spent away from the duty site.

Effective July 1, 2011, the following requirements apply to all residency training programs. Specific details can be found at the ACGME website, [acgme.org](http://acgme.org).

## General Guidelines

1. Residents are responsible for accurately reporting their duty hours, **including all time spent in Internal and External Moonlighting**, per program requirements.
2. Program Directors are responsible for monitoring and enforcing compliance with duty hour guidelines.
3. If specialty/subspecialty-specific program duty hour requirements as defined by an individual RRC for that specialty/subspecialty are more restrictive than the above requirements, then the duty hour requirements of that RRC will be included in the policy of that specialty/subspecialty program and will supersede the institutional requirements.
4. Concerns regarding duty hours may be reported to the Office of the Associate Dean for GME or through the following options:
  - Contacting the House Staff representatives on the Graduate Medical Education Committee (GMEC) via the E-mail address: [GMEConnect@wustl.edu](mailto:GMEConnect@wustl.edu)
  - Complaints can be submitted to the Office of the Associate Dean for GME at 314-747-4479, or by email at [draket@wusm.wustl.edu](mailto:draket@wusm.wustl.edu).
  - Concerns may be reported anonymously via the Institutional Anonymous Resident Survey conducted by the Office of the Associate Dean for GME annually.

## *Maximum Hours of Work per Week*

5. Duty hours must be limited to 80 hours, averaged over a four-week period per rotation or a four-week period within a rotation excluding vacation or approved leave. Any requests for exceptions to the maximum weekly limit on duty hours must be presented by the Program Director to the GMEC for review and approval.
6. Time spent in Internal and External Moonlighting will be counted toward the eighty-hour maximum weekly hour limit on duty hours as outlined in #5 above.

### ***Mandatory Time Free of Duty***

7. Residents must be scheduled for a minimum of one day free out of seven days every week (when averaged over four weeks). "Duty" includes all clinical and academic activities related to the program as described above. At-home call cannot be assigned on these free days.

### ***Maximum Duty Period Length***

8. Duty hour periods of PGY-1 residents must not exceed 16 hours in duration.
9. PGY-2 residents and above may be scheduled to a maximum of 24 hours of continuous duty in the hospital. Residents may be allowed to remain on site for an additional 4 hours to ensure effective transitions in care; however, they may not be assigned additional clinical responsibilities after 24 hours of continuous in-house duty.
10. The GME Consortium (WUSOM/BJH/SLCH) encourages residents to use alertness management strategies, including strategic napping, in the context of patient care responsibilities, especially after 16 hours of continuous duty and between the hours of 10pm and 8am.
11. In unusual circumstances and on their own initiative, PGY-2 residents and above may remain beyond their scheduled period of duty to continue to provide care to a single patient. Under such circumstances - which only include continuity of care for a severely ill or unstable patient, a transpiring event of unusual academic importance, or humanistic attention to the needs of a patient or family – the resident must appropriately hand over the care of all other patients responsible for their continuing care and document the reasons for remaining to care for the patient in question. Such documentation must be submitted to the Program Director in every circumstance. The Program Director is responsible for tracking both individual resident and program-wide episodes of additional duty and this information will be submitted to the Office of the Associate Dean for GME upon their request.
12. PGY-1 residents should have 10 hours and must have 8 hours free of duty between scheduled duty periods.
13. Intermediate level residents as defined by the respective Residency Review Committees should have 10 hours free of duty, must have 8 hours between scheduled duty periods, and must have at least 14 hours free of duty after 24 hours of in-house duty. Individual residency programs must construct their own duty hour policies in compliance with their individual program's requirements.
14. Residents in the final years of education must be prepared to enter the unsupervised practice of medicine and care for patients over irregular or extended periods. While it is desirable that residents in their final years of education have eight hours free of duty between scheduled duty periods, there may be circumstances when these house officers must stay on duty to care for their patients or return to the hospital with fewer than eight hours free of duty. Individual programs must construct their own written duty hour policies in compliance with their individual program's requirements as to the definition of "final years of education" and the circumstances where house officers may have less than 8 hours free between duty periods. In all instances, such circumstances must be monitored by the Program Director.

### *Maximum Frequency of In-House Night Float*

15. Residents must not be scheduled for more than 6 consecutive nights of night float. Individual residency programs must construct their own written duty hour policies in compliance with their individual program's requirements defining maximum consecutive weeks of night float and maximum number of months of night float per year.

### *Maximum In-House On-Call Frequency*

16. In-house call will occur no more frequently than every third night, averaged over a four-week period.

### *At-Home Call*

17. At-home call, or "pager call," is defined as call taken from outside the assigned site.
18. When residents are called into the hospital from home, they may care for new or established patients and the hours spent in-house, exclusive of travel time, are counted toward the eighty-hour limit. Such episodes will not initiate a new "off-duty period."
19. At-home call must not be so frequent or taxing as to preclude rest or reasonable personal time for each resident.
20. At-home call may not be scheduled on the resident's one free day per seven days (averaged over four weeks).

All programs must have policies for duty hours that at a minimum meet the ACGME's institutional and program requirements. Programs must monitor in-house and from-home duty hours with enough frequency to assure compliance with the Common and Specialty-specific requirements. The Office of the Associate Dean for GME will monitor the programs compliance in the following ways:

- The Office of the Associate Dean for GME will review responses in the ACGME's Annual Update related to work hours for an individual program. Program directors must sign the WebADS submission to attest to the accuracy of the information submitted in WebADS.
- The Office of the Associate Dean for GME will annually monitor all sponsored programs compliance with work hours via the Institutional Anonymous Resident Survey. Programs reporting significant noncompliance will submit time studies and an executive summary to the Office of the Associate Dean for GME documenting compliance or a plan to correct noncompliance. Additional monitoring by the Internal Review Subcommittee (IRS) may be warranted to assure future compliance.
- The results of the ACGME Anonymous Resident Survey will be compared to the Institutional Anonymous Survey to determine trends of noncompliance. Follow up on identified issues will be conducted through the IRS.
- Programs will quarterly report violations of the work hour requirements to the Office of the Associate Dean for Gme throughout the academic year. This information may be reviewed by the Internal Review Subcommittee of the GMEC for further follow up.
- Raw data will be provided to the Internal Review Panel at the time of the programs internal review.

### GMEC Requests for Increases Beyond the 80-Hour Limit:

Programs may request approval from the full GMEC for a 10% increase in the 80-hour limit if they believe this increase is necessary to fulfill their educational requirements. This would be on a rotation by rotation basis rather than a general increase in duty hours. Program directors with rotations needing a 10% increase will present the educational rationale to the full GMEC for institutional approval. Requests must be in writing and available for distribution to the GMEC voting members at least two weeks (14 days) prior to the next regularly scheduled GMEC meeting. All requests must include the educational rationale, most recent RRC Letter of Report, the most recent internal review report, a current schedule of house staff work hours for that rotation, and the results of the anonymous survey of house staff utilizing the ACGME survey format to be administered by the Office of the Associate Dean for GME and the results shared with the program director prior to the GMEC meeting. Directors requesting the increase will be provided time during the next GMEC meeting to present their information to the members present.

During that GMEC meeting, the director of the program under review, will excuse him/herself and their designee from the voting process. The members present will have an opportunity to discuss the information and vote to approve or disapprove the request based on the educational needs of the program. Service requirements will not be sufficient to justify the increase. All other duty hour limitations will still apply and are not subject to requests for modifications.

If the GMEC approves the request, the outline reviewed by the GMEC members, and a letter of support from the Chair of the GMEC will be submitted for review to the respective RRC for final approval. The full GMEC will be advised of all final decisions by the RRC once a decision is known.

If the GMEC disapproves the request, the members present must outline the reason(s) for rejecting the request. If the program is currently out of compliance with the duty hour requirements, suggestions from the members to assist the director in bringing the rotation into compliance with the standards are highly encouraged. The director will be required to return to the GMEC in 90 days to update the GMEC members of its progress in meeting the standards. If the program remains out of compliance, the GMEC members may request follow up action at this time.

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