

## GRADUATE MEDICAL EDUCATION COMMITTEE

## □ POLICY ON CORRECTIVE ACTION PLANS FOR PROGRAM DEFICIENCIES □

The University of Iowa Hospitals and Clinics (UIHC) and its Graduate Medical Education Committee (GMEC) are committed to ensuring that its physician residency and fellowship training programs meet all applicable standards and provide an environment that is appropriately supportive to the ongoing training of its learners. In that regard, correcting deficiencies in GME residency and fellowship programs that are noted through either external or internal review is a priority consistent with UIHC's educational mission.

Program Directors (PDs), in conjunction with their Departmental Executive Officers (DEOs), are responsible for complying with the following process:

**EXTERNAL NOTIFICATIONS:**

- **Definition of External Notification:** An external notification is a notice (electronic or paper) of delinquency, concern, or citation from an entity external to the UIHC (e.g., ACGME, certifying board, regulatory agency) that is a result of an accreditation, certification, or regulatory mandate. Such notification may require follow-up, a progress report, clarification, or rebuttal.
- **Draft Corrective Action Plan:**
  - If **Response Required:** If the external body requires a response (e.g., progress report, clarification), the PD submits a draft corrective action plan to the GME Director or his designee. The response must be comprehensive, fully addressing each point noted in the communiqué and must include descriptions of program adjustment, clarification, evaluation and/or follow-up as necessary to respond satisfactorily.
    - **PD Submission of Response/Deadline:** The PD submits the draft corrective action plan to the GME Director or his designee no later than 8 weeks after the PD receives the external notification. If the notice requires a more urgent response, the PD must contact the GME Director immediately as a shorter response is required.
    - **GME Director Review:** The GME Director reviews the draft corrective action plan.
      - If the plan is approved, then the PD prepares a final action plan that includes a signature line for the PD, DEO, and GME Director. The GME Director moves the approved corrective action plan to the GMEC for review/modification and approval.
      - If the plan requires modification, the GME Director will work with the PD to address any concerns about the adequacy of the corrective action plan. Once approved by the GME Director, the corrective action plan is moved to the GMEC for review/modification and approval.
    - **Communication to the External Body:** The corrective action plan will feed creation of the required report. The GME Director must approve and sign the final response *prior* to any submission to the external body. The PD is responsible for transmitting the final response in the required manner and in a timely way to meet the deadline specified by the external entity.
  - If **No Formal Response Required:** If the external body does not require a response, then the PD, with approval of his/her DEO, drafts an action plan designed to address the noted concern(s).
    - **PD Submission of Response/Deadline:** The PD submits the draft corrective action plan to the GME Director or his designee no later than 8 weeks after the PD receives the external notification.
    - **GME Director Review:** The GME Director reviews and approves the draft corrective action plan, or works with the PD to refine the plan. Once approval exists, the GME Director moves the corrective action plan to the GMEC for endorsement, as necessary.

**INTERNAL NOTIFICATIONS:**

- **Definition of Internal Notification:** An internal notification is a notice (electronic or paper) of a delinquency, concern, or citation from the Graduate Medical Education Committee (GMEC), the GME Office or the GME Director or his designee, signifying that a program concern or deficiency exists. Most commonly these occur within Internal Review Reports to PDs.
- **Draft Corrective Action Plan:** *All internal notifications require a written response by the PD to the GME Director or his designee.* The PD, with the approval of his/her DEO, must prepare a draft response. Responses must be comprehensive, fully addressing each point noted as a concern and include descriptions of adjustment, clarifications, evaluation and/or follow-up as necessary to respond satisfactorily.
  - **PD Submission of Response/Deadline:** The Program Director must submit the draft corrective action plan to the GME Director or his designee as directed in the internal notice.
  - **GME Director Review:** The GME Director or his designee will approve or work with the PD to refine the plan. Once approved by the GME Director or his designee, a final response is prepared and submitted to the GME Director, who will move the approved response to the requesting internal body.

After the GME Director has approved and signed the final draft of a corrective action plan draft, the PD is responsible for filing a copy with the GME Office.