

<b>Graduate Medical Education Policy</b>	Non-Standard Training Programs
<b>Facility/Sponsor</b>	CMC/GMEC
<b>Policy Origin Date</b>	January 2026
<b>Revision Date</b>	

## **PURPOSE**

The purpose of this policy is to establish institutional standards and procedures for ensuring safe, high-quality education in non-ACGME clinical fellowships and Non-Standard Training (NST) programs at Carilion Medical Center. This policy is intended to align with ACGME Recognition Requirement for Sponsoring Institutions with NST programs that are required to host J-1 Visa physicians in non-ACGME clinical training, and to align with the ECFMG Exchange Visitor Sponsorship Program rules for NST pathways, all while maintaining compliance with ACGME Common Program Requirements regarding the presence of other learners and avoidance of adverse impact on accredited programs.

## **SCOPE**

This policy applies to all proposed or existing non-ACGME clinical fellowships and NST programs that enroll or plan to enroll J-1 physicians and therefore require ACGME NST Recognition.

## **DEFINITIONS**

**Accreditation Council for Graduate Medical Education (ACGME):** a private, non-profit organization that sets standards, evaluates, and accredits physician residency and fellowship training programs in the United States.

**Educational Commission for Foreign Medical Graduates (ECFMG):** is a non-profit organization that evaluates International Medical Graduates (IMGs) to ensure they are ready for graduate medical education and practice in the United States by verifying their credentials, medical knowledge, and clinical and communication skills.

**Sponsoring Institution:** the organization or entity that assumes the ultimate financial and academic responsibility for a graduate medical education program consistent with ACGME Institutional Requirements.

**Non-Standard Training (NST) Program Recognition:** clinical training for foreign national physicians in advanced subspecialty programs for which there is no ACGME accreditation or American Board of Medical Specialties Member Board certification, enabling these physicians to get crucial, specialized training not available in their home countries. Non-Standard Training programs must follow strict ACGME standards for supervision, hours, and evaluation.

**Non-Standard Trainee:** a physician in a non-standard training program who holds a J-1 visa sponsored by the Educational Commission for Foreign Medical Graduates.

**Parent Program:** the most closely related ACGME-accredited residency or fellowship that maintains Continued Accreditation and provides faculty, sites, and oversight linkage to the NST.

**Designated Institutional Official (DIO):** the individual in a Sponsoring Institution who has the authority and responsibility for all of that institution's ACGME and Non-Standard Training Programs.

**Graduate Medical Education Committee (GMEC):** a critical oversight body at hospitals and medical schools that ensures the quality and accreditation of residency and fellowship training programs, acting as the primary authority for ACGME compliance, resident wellbeing, educational standards, and policy development for physicians in training.

**Program Director:** the individual designated with authority and accountability for the operation of a residency/fellowship program, including compliance with all applicable program requirements.

## **PROCEDURE**

### **1. Governance and Oversight**

- a. The Sponsoring Institution and DIO have ultimate authority for NST oversight. Decisions regarding NST Recognition are made by the ACGME Institutional Review Committee.
- b. The GMEC will review all proposals, changes in structure/complement, program director appointments, and conduct periodic internal review of non-ACGME NST programs.
- c. The GMEC will ensure NST programs do not adversely impact the education of residents and fellows in ACGME programs.
- d. Each NST program must be linked to the most closely related ACGME-accredited program, sharing approved participating sites, faculty, and supervision frameworks.
- e. Programs must utilize ACGME ADS (NST module) for program profiles and trainee information, and must follow the site visit and annual update requirements.

### **2. New Program Approval and Application Process**

- a. A department may propose an NST program if:
  - i. The subspecialty focus lacks ACGME accreditation and ABMS board certification; and the SI maintains ACGME Institutional Accreditation in good standing.
  - ii. A parent program exists at the SI with Continued Accreditation.
  - iii. The program seeks to enroll or may in the future enroll J-1 physicians which would require NST Recognition.
- b. Department leaders may submit a concept memo and pro forma to the GME Office that includes at a minimum an outline of expected faculty effort, teaching resources, clinic/OR access, projected complement, impact on parent program, etc.
- c. Upon review by the GME Office, a full formal proposal including the following elements will be submitted to the GMEC for review:
  - i. Subspecialty focus and ACGME NST focus area alignment (or a request for a new focus area)
  - ii. Proposed Program Director (from parent program faculty) and key teaching faculty
  - iii. Curriculum with educational goals, trainee patient care responsibilities, supervision plan, didactics, procedural requirements if applicable, and rotation block schedule at parent program sites.
  - iv. Assessment plan including milestone aligned assessment using the closest ACGME specialty milestones, semi-annual and summative evaluations, and trainee feedback mechanisms.
  - v. Work hour compliance review including how the program will design the schedule such that trainees meet work hour limits

- vi. Resource impact statement documenting no adverse impact on ACGME programs
- vii. Letters of support from the Department Chair and Parent Program Director
- d. The GMEC will review the proposal and may approve, approve with conditions, or decline the proposal. If approved:
  - i. The Sponsoring Institution will submit the NST Recognition Application via ACGME ADS.
  - ii. The Sponsoring Institution will pay the NST Application and Annual Fees per ACGME schedule.
  - iii. The Sponsoring Institution will enter the NST Program Description (program profile, linked parent program, participating sites, curriculum, assessment, supervision, program length in months, and rationale).
  - iv. The Sponsoring Institution will keep NST data current and ensure the program complies with site visits and annual update processes.

### **3. Trainee Eligibility and Selection**

- a. The minimum qualifications for trainees seeing to enter an NST program at Carilion Medical Center include the following:
  - i. Completion of appropriate residency training (ACGME-accredited or Canadian RCPSC/CFPC for fellowships)
  - ii. ECFMG certification (for IMGs)
  - iii. Legal authorization to train and work in the United States.
- b. The program will collaborate with the ECFMG Training Program Liaison (TPL) to create appointment profiles and documentation checklists as outlined by the ECFMG.
- c. Selection of candidates follows equal opportunity principles and institutional eligibility policies; if participating in the NRMP or other specialty matches for fellowships, programs must adhere to applicable match policies and institutional attestations.

### **4. Program Director and Faculty Requirements**

- a. The Program Director must be a faculty member from the parent program, approved by the GMEC, and responsible for supervision, education, and assessment at all participating sites.
- b. The Program Director must identify supervising faculty and ensure appropriate supervision levels are consistent with ACGME expectations at all participating sites.

### **5. Curriculum, Supervision, and Evaluation**

- a. The program must:
  - i. Develop and document educational goals, trainee responsibilities for patient care and care management, didactics, and required procedures/experiences as applicable.
  - ii. Define graded supervision; the physical presence of supervising faculty is required until an early assessment in the first three months of training confirms readiness for indirect supervision/oversight based on closest ACGME specialty milestones.
  - iii. Develop an early (0-3 months) milestone-based assessment, semi-annual formative evaluations, summative evaluation at completion of training, and a documented method for regular trainee feedback.
  - iv. Develop a program curriculum and schedule that complies with ACGME work hour standards and learning environment expectations for fatigue mitigation, safety, and supervision.

### **6. Participating Sites and Resources**

- a. Trainees in an NST program may rotate only at participating sites of the parent program listed in ADS.
- b. New participating sites require the parent program to update their list of participating sites with GMEC approval
- c. The Sponsoring Institution must ensure adequate personnel, clinical volume, and resource allocation to avoid adverse impact on ACGME programs.

**7. Appointment Types, Compensation, and Billing**

- a. Institutional policy will define whether or not NST fellows are appointed as GME Fellows with trainee stipend, benefits, and liability, or Instructor Fellows with faculty appointment that is consistent with payer rules. J-1 trainees must be in appointments compatible with ECFMG sponsorship.
- b. Programs must follow institutional rules on independent billing for non-ACGME fellows; J-1 NST trainees generally may not bill independently when appointed as a GME Fellow.

**8. Documentation and Administration**

- a. The program will maintain ADS NST program entries including the program profile, participating sites, trainee information, block schedules, etc.).
- b. The program will maintain personnel files for non-standard trainees. See GME Record Retention Policy.
- c. Upon successful completion of the program, the GME Office will issue an institutional certificate to graduates stating the NST program name and focus area.
- d. Programs must report trainee incidents and allegations per EVSP reporting forms and institutional policies.
- e. Programs will follow institutional discipline and due process policies and will notify the ECFMG for J-1 trainees when applicable.

Designated Institutional Official	Reviewing Committee	Date Approved
Arthur Ollendorff, MD	GMEC	January 20, 2026
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