

Medical Education Policy: Discipline – Administrative Sanction

Facility: CMC

Origin Date: July 2009

Revision Date: March 2019

Sponsor: GMEC

1. PURPOSE:

Administrative Sanction is a process that allows the Program Director to temporarily relieve a resident of clinical and educational duties to enforce the completion of overdue administrative and other required tasks.

2. SCOPE:

This Policy applies to all Accreditation Council of Graduate Medical Education (ACGME), Council on Podiatric Medical Education (CPME), and Commission on Dental Accreditation (CODA) accredited post-graduate training programs sponsored by Carilion Medical Center (CMC) as well as to visiting residents participating in approved educational programs who are rotating at Carilion Clinic through institutional agreements.

3. DEFINITIONS:

3.1 Non-adverse Action: an action described in this policy that does not require the resident to report the event being subjected to disciplinary action in future disclosures.

3.2 Administrative Sanction: a non-adverse action taken at the departmental level to temporarily relieve a resident of clinical duties for failure to comply with institutional or medical education policies pertaining to administrative matters. Examples of such administrative matters might include, but are not limited to: failure to complete clinical and educational work hour input, not following appropriate departmental policy for time off requests, failure to complete other forms of required paperwork, failure to complete medical documentation in a timely fashion, or failure to complete required in-services.

Right to Appeal: None

3.3 Other Definitions:

- 3.3.1 Business Days refers to Monday through Friday and excludes holidays recognized by Carilion Clinic.
- 3.3.2 Designated Institutional Official (DIO) is the individual appointed by the Institution to provide oversight, administration, and accountability to Carilion Clinic's accredited Graduate Medical Education programs.
- 3.3.3 Director of Osteopathic Medical Education (DOME) is a certified osteopathic physician appointed by the institution to provide oversight, administration, and accountability to the Institution's AOA accredited programs.
- 3.3.4 Institution is Carilion Clinic collectively and includes its subsidiaries.
- 3.3.5 Program or Residency Program refers to an accredited post-graduate medical education program based at Carilion Clinic.
- 3.3.6 Program Director is the lead physician appointed by the Institution and registered with the appropriate ACGME Residency Review Committee, CODA, or CPME to provide academic and administrative oversight of the respective Residency Program.
- 3.3.7 Resident refers to all interns, residents, and fellows participating in CMC accredited post-graduate medical education programs.

4. PROCEDURE:

4.1 General Guidelines:

- 4.1.1 The timeframes described in this Policy are to be followed in the normal course, but they may be altered or adjusted based on the discretion of the Program Director. Additionally, the parties may agree in writing to waive a particular timeframe.
- 4.1.2 If hand delivery of a document is utilized under this Policy, the person delivering the document will ask the recipient of the document to sign and date the document to acknowledge receipt. If the recipient refuses to do so, the person delivering the document will note "recipient refused to sign and date at ____ (time) on _____ (date)."
- 4.1.3 If written notice is to be provided or delivered under this Policy, it may be accomplished by hand delivery, via delivery of the USPS or via overnight delivery by a reputable overnight delivery organization. Notice will be deemed to be received on the date of hand delivery, on

the day delivered by the overnight delivery organization or on the third day following deposit of the written notice with the USPS. The most recent address on record should be used for the USPS and overnight delivery organizations.

- 4.1.4 Where this Policy refers to the involvement of the DIO and/or the DOME, it is understood that the DIO will be involved with osteopathic and allopathic residents enrolled in a program accredited by the ACGME or in a program accredited by both the ACGME and AOA. Similarly, the DOME will be involved with osteopathic residents enrolled in a Program accredited by the AOA, with or without dual accreditation by the ACGME.
- 4.1.5 Administrative Sanction under this Policy will be administered in full day or full week increments depending upon the circumstances.

4.2 Administrative Sanction:

- 4.2.1 The Program Director must provide verbal and written notice to the resident of the decision to place the resident on Administrative Sanction.
- 4.2.2 The resident will be required to report to the office of the Program Director or Program Manager immediately or as soon as reasonably possible after verbal notification to receive and sign a written notice of Administrative Sanction.
- 4.2.3 The written notice will identify the areas of deficiency and will establish a time period for correction of the deficiencies. The resident will be provided with a copy of the written notice of Administrative Sanction, and a copy will be retained in the resident's file.
- 4.2.4 If the resident is unable to report to the office of the respective Program Director or Program Manager in a reasonable period of time (three (3) business days), the written notice of Administrative Sanction will be delivered to the resident.
- 4.2.5 Administrative Sanction will be with pay. In some cases, a resident may be required to utilize vacation if the resident is relieved of work for a period. A Program Director may require a resident to use allotted CME days during a period of Administrative Sanction. Additionally, a Program Director may require a resident to forfeit eligibility for educational funds as part of an Administrative Sanction.

- 4.2.6 Residents may be required to extend the period of residency training to make up for time lost due to Administrative Sanction.
- 4.2.7 Failure to correct the deficiencies in the specified time frame may result in further disciplinary action, including possible Probation, Suspension or Dismissal.

Name	Title	Dept./Committee	Date
Daniel Harrington, MD	DIO	GMEC	March 15, 2011
Donald W. Kees, MD	DIO	GMEC	November 18, 2014
Donald W. Kees, MD	DIO	GMEC	January 16, 2018
Donald W. Kees, MD	DIO	GMEC	March 19, 2019