COMMON AREAS OF NONCOMPLIANCE FOR FELLOWSHIPS

The most common RRC citations for fellowships are listed below.

Summary of specialty specific noncompliance can be found as follows:

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PROGRAM DIRECTOR/POLICIES/DOCUMENTATION

- No policy to address supervisory lines of responsibility for care of patients
- No policy to address appointment eligibility and selection of fellows
- Resident recruitment policy
- Formal description differentiating roles and responsibilities of the fellow and core radiology residents
- No letters of agreements, agreements unsigned, not dated
- Qualifications of program director not adequate; no CAQ or other
- Time PD devotes to program, not adequate
- Inadequate preparation of the PIF; inaccuracies, incomplete data
- Fellows do not participate in quarterly/monthly education/faculty committee meetings
- No Education committee minutes
- No internal review of the program conducted since previous site visit; process did not comply with requirements
- No policy/monitoring of duty hours not adequate

CURRICULUM

- Lack of a formal written curriculum directed to the level of the fellow
- Goals and Objectives inadequate, do not address the competencies
- Competencies not incorporated in educational experiences, evaluation tools

CONFERENCES/DIDACTICS

- No Journal Club (or frequency of JC is not monthly)
- No M & M (or does not meet frequency requirement)
- Goals and objectives inadequate, too brief, do not address competencies, are not reviewed with fellows prior to beginning of educational component
• Description of educational experiences inadequate
• Conferences not organized, formalized, no conference schedule
• Conferences not directed to the level of the fellow
• Fellow participation in multidisciplinary conferences minimal, not sufficient
• No curriculum component to address signs of fatigue and sleep deprivation

EVALUATION
• No formal evaluation of faculty
• No summative evaluation of residents with verification statement
• Lack of formal program annual evaluation process
• Faculty do not evaluate program

CLINICAL EXPERIENCE
• No assurance that ACLS certification of fellows is monitored/completed
• Experiences may be observational only
• Pediatric case experience inadequate
• Specific procedures not sufficient in number or lacking
• Procedure log – log is informal, accurate data is not maintained
• Clinical experience not adequately structured

SCHOLARLY ACTIVITY
• Fellows not required to complete project
Citation Summary Report – SUBSPECIALTIES of Radiology
Abdominal Radiology

CITED AREAS of NONCOMPLIANCE (2003 to present)

POLICIES (lacking, no documentation)
- Resident recruitment policy
- Monitoring of duty hours
- Formal description differentiating roles and responsibilities of the fellow and core radiology residents

PROGRAM DIRECTOR RESPONSIBILITIES
- Program director does not assure that fellows are provided direct experience in progressive responsibility for patient management
- Fellows are not assured funding to attend at least one national meeting or postgraduate course during the fellowship year
- Inadequate preparation of PIF; inaccurate, discrepant data

CURRICULUM
- Lack of a formal comprehensive written curriculum
- A teaching file has not been developed
- Curriculum not directed to the level of an abdominal radiology fellow, rather to core radiology residents
- Goals and objectives are not reviewed with fellows prior to the start of a rotation or area of concentration

CONFERENCES/Didactics
- Conferences not directed to the level of the fellow
- No educational component to address the sins of fatigue and sleep deprivation

CLINICAL EXPERIENCE
- No rotation schedule; vague description of clinical activities
- Two-month ultrasound rotation is not adequate; fellows function as technologists only and are not exposed to complex cases
- Insufficient experience in interventional procedures
- Insufficient experience in operative and postoperative cholangiography and GI fluoroscopy
- Lack of experience in genitourinary imaging procedures

LACK of DOCUMENTATION
- Procedure log is not maintained by the fellows
- No documentation of formal evaluation of faculty
- No documentation of quarterly evaluations of the fellow

EVALUATION
- Program director does not conduct formal evaluation sessions with the fellows
- Lack of formal program annual evaluation process
- No formal summary evaluation provided to include a verification that the fellow has the ability to practice without supervision
• No process for faculty to evaluate the program

SCHOLARLY ACTIVITY
• Fellows not required to complete project

RESOURCES
• Administrative staff support not adequate
• Computer resources inadequate
• Lack of sufficient space in the MR reading room
Citation Summary Report – SUBSPECIALTIES of Radiology
Endovascular Surgical Radiology

CITED AREAS of NONCOMPLIANCE (2003 to present)

PROGRAM DIRECTOR RESPONSIBILITIES
• No fellows included in departmental education committee meetings
• Unclear as to how many fellows are enrolled in the program

CURRICULUM
• Goals and objectives no developed for each educational component

CLINICAL EXPERIENCE
• Long-term outpatient care provided by fellows inadequate
• No pre-requisite 3-month rotation in neurosurgery

EVALUATION
• Lack of formal program annual evaluation process
Citation Summary Report – SUBSPECIALTIES of Radiology
Musculoskeletal Radiology

CITED AREAS of NONCOMPLIANCE (2003 to present)

POLICIES (lacking, no documentation)
- Monitoring of duty hours

PROGRAM DIRECTOR RESPONSIBILITIES
- PIF contained inaccurate, discrepant information
- Program letter of agreement did not address specified components
- Reported lack of supervision at rotations to participating site
- No breakdown of adult and pediatric cases data as requested in PIF
- Rotation schedule is ‘significantly’ vague

FACULTY
- Insufficient qualified faculty members

CURRICULUM
- Goals and Objectives inadequate, do not address the competencies, directed to core radiology residents, lack specificity
- Formal curriculum that addresses the scope of musculoskeletal radiology is lacking; not directed to the level of the fellow; lacks specificity
- Specific components of the requisite curriculum lacking

CONFERENCES/Didactics
- Conferences not directed to the level of the fellow

CLINICAL EXPERIENCE
- Clinical experience provided is incomplete; does not address the full range of musculoskeletal diseases of both adult and pediatric patients
- Experience in spine examinations is insufficient, currently performed by neuroradiology
- Limited experience with arthrograms and joint injections
- No experience, insufficient experience in bone and soft tissue biopsy of the extremities, CT-guided spinal bone biopsies or nerve blocks
- No experience provided in nuclear medicine

LOGS
- Fellows are not required to maintain a procedure log

LACK of DOCUMENTATION
- Documentation of quarterly written evaluations of the fellows not available for verification by the site visitor

EVALUATION
- Lack of formal, documented annual program evaluation
- No verification statement in summary evaluation of the fellow
- No evaluations of faculty completed by residents
SCHOLARLY ACTIVITY
  • Inadequate participation of the faculty in scholarly activities

RESOURCES
  • Equipment is outdated
FREQUENTLY CITED AREAS of NONCOMPLIANCE (2003 to present)

PROGRAM DIRECTOR and FACULTY
- Qualifications of program director not adequate
- Time PD devotes to program, not adequate
- Qualifications of faculty not adequate
- Lack of adequate supervision by faculty
- Teaching by faculty members not adequate

POLICIES (lacking, no documentation)
- No policy to address supervisory lines of responsibility for care of patients
- No policy to address appointment eligibility and selection of fellows

CURRICULUM
- Lack of a formal written curriculum
- Goals and Objectives inadequate, do not address the competencies
- Competencies not incorporated in educational experiences, evaluation tools

CONFERENCES/Didactics
- Goals and objectives inadequate, too brief, do not address competencies, are not reviewed with fellows prior to beginning of educational component
- Description of educational experiences inadequate
- Conferences not organized, formalized, no conference schedule
- Curriculum is not structured to cover the breadth of neuroradiology
- Conferences not directed to the level of the fellow
- Fellows do not regularly attend conferences
- No M & M conferences
- Fellow participation in multidisciplinary conferences minimal, not sufficient
- No curriculum component to address signs of fatigue and sleep deprivation

CLINICAL EXPERIENCE
- Insufficient numbers of image-guided invasive procedures
- Insufficient numbers of neuroangiography procedures
- Insufficient nuclear medicine studies of the central nervous system
- Insufficient pediatric experience
- Insufficient experience in head and neck radiology
- No assurance that ACLS certification of fellows is monitored/completed
- Experiences may be observational only
- Lack of experience in conscious sedation

LACK of DOCUMENTATION
- Program Evaluation (annual) – no written record, minutes
- Procedure log – log is informal, accurate data is not maintained
- No documentation of formal evaluation of faculty
- Prior training of fellows not documented in files
- No letters of agreements, agreements unsigned, not dated
EVALUATION
- PD does not conduct formal evaluations of fellows quarterly
- No formal evaluation of faculty
- Fellows do not formally evaluate faculty
- No summative evaluation of residents with verification statement
- Lack of formal program annual evaluation process
- Evaluation of log not adequate, no documentation of formal evaluation of log with fellow, frequency of evaluation does not meet requirement specifications
- Process to evaluate faculty does not protect confidentiality of fellow
- Faculty do not receive timely feedback from fellow evaluations
- No documentation to support monitoring fellows sitting for Boards

SCHOLARLY ACTIVITY
- Fellows not required to complete project or participation in research optional
- Faculty productivity is not adequate, no publications listed for most recent 5-year period
- Fellows not provided opportunity to attend at least one national meeting

EQUIPMENT/Resources
- Lack of equipment
- Equipment not state-of-the-art
- Office space for fellows not sufficient
- Lack of ancillary support services

INFREQUENT CITATION AREAS
- Outdated library, no teaching file
- Call activities required of fellows for other than neuroradiology cases
- PD did not request prior approval for international rotation
- Internal review – not conducted – lack of fellow representation – not timely
- No clinical experience in lymphography
- Fellows not assured experience in interpreting plain films
- Educational goals are secondary to service obligations
- Presence of neurosurgery residents dilutes experience of fellows
- Cerebral angiography component not adequate
- Required moonlighting assignment not acceptable
- Relationship between imaging center and the program not well defined
- Limited exposure in ENT radiology
- No evaluation from faculty during 1-month offsite rotation
Citation Summary Report – SUBSPECIALTIES of Radiology
Nuclear Radiology

CITED AREAS of NONCOMPLIANCE (2003 to present)

POLICIES (lacking, no documentation)
• No policy description to address lines of supervision for the care of patients
• No policy to address monitoring of duty hours

PROGRAM DIRECTOR RESPONSIBILITIES
• Faculty committee meetings do not include participation of fellow
• Inaccuracies, discrepant information reported in the PIF
• Letter of agreement did not include all requisite information specified in the PR/IR
• Unclear what educational components are provided at participating site – no educational rationale for the fellow assignments

FACULTY
• Commitment of faculty to teaching questioned, as fellows are responsible for more than fifty percent of scheduled conferences

SERVICE vs EDUCATION
• Fellows required to cover 3 imaging shifts (weekends, 10 am to 8 pm) to ‘keep up with diagnostic skills’; unclear if supervision is adequate

CURRICULUM
• Lack of a formal comprehensive written curriculum directed to the level of the fellow
• No curriculum component to address pathology
• Goals and objectives not well defined

CONFERENCES/Didactics
• Conferences not directed to the level of the fellow
• Weekly lectures canceled because of staffing issues; no other didactics provided

CLINICAL EXPERIENCE
• Number of myocardial perfusion studies performed is low
• Volume of pediatric nuclear medicine studies is low

LACK of DOCUMENTATION
• No documentation of quarterly evaluations of the fellow
• No teaching file maintained

EVALUATION
• Lack of formal program annual evaluation process
• No formal summary evaluation provided to include a verification that the fellow has the ability to practice without supervision
• Fellows do not formally evaluate faculty members, in writing
• No formal performance review sessions to include PD and fellows
• Faculty do not formally evaluate the program at least annually
• Internal review did not include interviews with faculty members / fellows; did not occur at midpoint between site visits

SCHOLARLY ACTIVITY
• No meaningful participation by fellows in research efforts
• Fellows are not required to participate actively in research or other scholarly activities
• No presentations at regional or national meetings or publications reported by fellows

RESOURCES
• Patient interview space unacceptable
• Office space allocated for fellows is inadequate – shared space, shared computers
• No PET scanner
Citation Summary Report – SUBSPECIALTIES of Radiology
Pediatric Radiology

FREQUENTLY CITED AREAS of NONCOMPLIANCE (2003 to present)

POLICIES (lacking, no documentation)
- Resident recruitment policy
- Monitoring of duty hours
- Formal description differentiating roles and responsibilities of the fellow and core radiology residents

CURRICULUM
- Lack of a formal written curriculum
- Goals and Objectives inadequate, do not address the competencies
- Competencies not incorporated in educational experiences, evaluation tools

CONFERENCES/Didactics
- No Journal Club (or frequency of JC is not monthly)
- No formal conference schedule
- No M & M (or does not meet frequency requirement)

CLINICAL EXPERIENCE
- Specific procedures not sufficient in number or lacking
- Clinical experience not adequately structured

LACK of DOCUMENTATION
- Program Evaluation (annual) – no written record
- Procedure log – log is informal, accurate data is not maintained
- No documentation of formal evaluation of faculty

EVALUATION
- No formal evaluation of faculty
- No summative evaluation of residents with verification statement
- Lack of formal program annual evaluation process

SCHOLARLY ACTIVITY
- Fellows not required to complete project

INFREQUENT CITATION AREAS
- Lack of qualified faculty, program director qualifications inadequate
- Inadequate equipment
- Inadequate space for fellows
- Internal review – not conducted – lack of fellow representation – not timely
FREQUENTLY CITED AREAS of NONCOMPLIANCE (2003 to present)

PROGRAM DIRECTOR
- Qualifications of program director not adequate; no CAQ or other
- Time PD devotes to program, not adequate
- Inadequate preparation of the PIF; inaccuracies, incomplete data
- PD has not assured that all fellows have completed training/certification in ACLS
- Fellows do not participate in quarterly/monthly education/faculty committee meetings
- No internal review of the program conducted since previous site visit; process did not comply with requirements
- No record maintained of fellow procedures
- No policy/monitoring of duty hours not adequate

FACULTY
- Qualifications of faculty not adequate
- Insufficient number of qualified faculty
- Lack of adequate supervision by faculty
- Teaching by faculty members not adequate
- No meetings or no regular documented meetings of the teaching staff
- Faculty supervision inadequate; direct supervision of invasive cases not assured

POLICIES (lacking, no documentation)
- No policy to address supervisory lines of responsibility for care of patients
- Lack of policy re eligibility requirements
- Resident contracts unsatisfactory

CURRICULUM
- Lack of a formal written comprehensive curriculum directed to the level of the fellow
- Goals and Objectives have not been developed, are inadequate
- No formal goals and objectives
- Goals and objectives do not address each rotation and/or program assignment
- Curriculum does not address specific components
- No curriculum component to address sleep deprivation and recognition of signs of fatigue

CONFERENCES/Didactics
- No Journal Club directed to the interests and/or level of the fellow
- M & M Conferences directed to radiology residents, not to the level of the fellow; are not scheduled monthly
- Conferences listed are not presented
- Conferences not directed to the level of the fellow, rather more appropriately designed for diagnostic radiology trainees
- Fellows not provided protected time to attend conferences
- Fellows do not attend interdisciplinary conferences
CLINICAL EXPERIENCE
- Insufficient experience in MR/vascular studies
- Insufficient experience with CT (image guided biopsies, angiograms)
- Insufficient experience in non-invasive vascular sonography
- Pediatric case experience is insufficient
- Insufficient experience in vascular ultrasound
- Fellows do not provide long term or short term follow-up of patients
- Experience with peripheral arterial cases inadequate
- Fellows do not perform percutaneous drainage of fluid collections or ablation of cysts and neoplasms

LACK of DOCUMENTATION
- No documentation of conference attendance
- Program letters of agreement incomplete, do not address all requisite components; no PLA developed
- No minutes, other documentation of faculty meetings
- No documentation that PD reviews procedures logs with fellows

EVALUATION
- PD does not conduct formal evaluations of fellows quarterly
- No formal evaluation of faculty
- Fellows do not formally evaluate faculty members
- No summative evaluation of residents with verification statement
- Lack of formal program annual evaluation process
- Faculty do not formally evaluate program
- Number of fellows completing certification process (CAQ) is insufficient

SCHOLARLY ACTIVITY
- Fellows not required to complete project or participate in research; participation optional, only encouraged
- Fellows not required to submit at least one paper or exhibit to a regional or national meeting
- Faculty productivity is not adequate, few or no publications listed for most recent 5-year period

EQUIPMENT/Resources
- Ultrasound equipment is seriously outdated, angiographic units not state-of-the-art
- Office space for fellows is inadequate; shared space, no space for charting/dictation
- Imaging/procedure rooms and equipment available for V/I radiologic procedures inadequate
- Inadequate staffing of ancillary support
INFREQUENT CITATION AREAS

- One fellow was exempted from attending/participating in formal conferences
- Institutional support lacking: PD information that no funds would be available for fellows to attend a national meeting
- Insufficient clinical experience in lymphography
- Fellows not provided full breadth of educational experiences; transplant service lacking
- Faculty members do have academic appointments
- No program policies available for verification by the site visitor

SERVICE vs EDUCATION

- Service obligations must remain secondary to educational considerations
- Fellows assigned to participating site only to take call
- Current fellow spends 60% time on neurointerventional cases
- Fellows are not assured protected time to interpret studies