EUFAC
EMERGENCY ULTRASOUND
FELLOWSHIP ACCREDITATION COUNCIL

Policy Title: Audits, Site Visits and Egregious Events Policy
Policy Number: EUFAC – AC 1.0.4
Effective Date: 08/02/2022
Purpose: Outlining processes for annual audits, site visits, and handling of egregious events.

Policy

Once a fellowship program achieves EUFAC accreditation status, it is the EUFAC's responsibility to ensure that compliance with AEMUS Program Requirements as approved are maintained by the program. To confirm compliance, the EUFAC has the ability to conduct annual audits. Where compliance is in question and cannot be confirmed in a remote setting, the EUFAC has the ability to initiate a site visit. Further, if an egregious event is noted, they EUFAC may conduct a review outside of the ordinary review cycle.

The EUFAC Executive Director will prepare a Letter of Notification for each program following an audit, site visit, or egregious event. The Program/Institutional Letter of Notification shall state the action(s) taken by the EUFAC and the current accreditation status.

Procedures

1.0 Annual Audit

The EUFAC may conduct an annual audit of selected accredited programs that consists of a solicitation and review of information. The purpose of this audit is to solicit information relative to questions on the initial application to verify the validity of the initial answers. The audit will consist of questions and documents that address initial questions, but with increased granularity. (example – Initial accreditation question "Does your fellow perform 1000 ultrasounds each year?" - Audit question "How many ultrasounds did your fellow perform last year? and "Submit dates and types of ultrasounds performed in the Month of May of this past year.")

1.1 Annual Audit Process

- **a)** There is a single, electronic process for program audit for all programs being audited. Programs selected for audit are required to submit responses to all EUFAC questions and submit all requested documents.
- **b)** The scope and detail of the request will be determined by the EUFAC Chair and/or the Executive Director.
- **c)** Programs who do not submit responses may lose their accreditation status.
- **d)** The program director will be notified that their program is being audited.
- **e)** Programs will have 8 weeks to submit responses once they are notified of the audit.
- **f)** Failure of compliance could result in the following:
    1. Formal Notice to Department Chair
    2. Formal Notice to Institution DIO

3. Loss of fellowship accreditation

1.2 Review of Audit Submissions

EUFAC will review all program audits for any inconsistencies between the audit submission and the most current program application. Data will be compared to identify instances when the audit data is inconsistent with information submitted by the program at the time of the most current accreditation application.

- **a)** The submitted information will undergo an initial review by the EUFAC Executive Director or administrative staff to identify all instances where responses by the audit are not consistent with those submitted by the program during the current accreditation application.
- **b)** In instances where inconsistencies are noted, audit data and most current accreditation responses from the program will be submitted to EUFAC for review.
- **c)** EUFAC will determine if the inconsistency is significant. If the inconsistency is insignificant then no action will be taken.
- **d)** If the inconsistency is significant then the following options could be taken:
    1. Record the information for consideration during next accreditation cycle
    2. Solicit additional information from program or fellow and refer for further review
- **e)** If additional data is gathered, EUFAC may institute a process of review of the data received to determine what if any action should be taken to change the status of the accredited program.
- **f)** This process may include the following:
    1. Referral of matter to EUFAC Chair for review
    2. Referral of matter to the full EUFAC for review (quorum rules apply)
        i. Decision to record information for consideration during next accreditation cycle
        ii. Decision to send EUFAC notification letter to program and department chair outlining AEMUS Program Requirements in question.
- **g)** Initiate process to review program to change accreditation status of program or change to fellow complement
    1. A determination of a change in accreditation status or change in fellow complement can only occur after a review by EUFAC. EUFAC review will occur without cost to the program being reviewed.
    2. Programs who are referred to the full EUFAC for review will be notified prior to initiating the EUFAC review.
    3. Programs who are determined by EUFAC that a change in accreditation status or fellow complement is required will be notified within 15 business days of the final determination.

2.0 Site Visits

It is understood that sites visits will be rare events that occur only under extraordinary circumstances and following the existing mechanisms for due process. The option of a virtual site visit may be entertained given the goals of the site visit.

The EUFAC may use site visits in assessing compliance with the accreditation programs requirements or to resolve issues that arise during audits, information solicitation or unsolicited complaints. A status of an accredited program may be changed as a result of the site visit findings.

- **a)** Accreditation site visits are conducted by individuals designated by EUFAC as representatives of EUFAC.
- **b)** Site visits will be “announced”.
- **c)** For all types of accreditation site visits, representative(s) assesses the compliance status of the

program and reconciles potentially different perspectives.

d) EUFAC representatives involved in the site visit will use, as indicated, information collected by the EUFAC (including examination pass rates, program review (faculty/fellow) results, the program's accreditation history, on-site interviews and review of documents, tours of clinical and educational facilities, and other fact-finding processes.

e) EUFAC representatives involved in the site visit may also use documents specifically prepared for the site visit, such as summaries of complaints, discrepancies between data submitted to EUFAC or focused documents prepared to describe and clarify selected aspects of the program being visited.

f) EUFAC representatives involved in the site visit may vary the model for interviews, and may choose to interview fellows and other participants in large or small groups, or individually.

g) Through the interviews, review of documents, tours, participation in program activities, and other data collection activities, the EUFAC representatives involved in the site visit aims for a thorough assessment of strengths and opportunities for improvement of the program.

h) EUFAC representatives involved in the site visit prepare a report to the EUFAC on the relevant aspects of the program.

i) EUFAC representatives involved in the site visit do not make recommendations regarding a program's accreditation status.

j) During the debriefing exit interview, EUFAC representatives involved in the site visit may clarify potentially discrepant information with institutional and program leadership discovered during the site visit.

k) During program site visits, the EUFAC representatives involved in the site visit interviews the program director, faculty members, and fellow(s), and may interview other administrators and institutional or program representatives.

l) The EUFAC representatives involved in the site visit may be a single person.

2.1 Types of Site Visits

The following site visits may be conducted at the discretion of the EUFAC:

a) Focused Site Visit – Resolution or Adjudication of Unsolicited Complaint

b) Focused Site Visit – Resolution of Appeal

c) Site Visit for Alleged Egregious Violations

2.1.1 Focused Site Visit – Resolution or Adjudication of Unsolicited Complaint

A focused site visit to adjudicate an unsolicited complaint assesses selected aspects of a program identified by the EUFAC, following an Unsolicited Complaint, that remain unresolved and may be used:

a) To address selected aspects of the program in question that were identified during the review of the Unsolicited Complaint.

b) To evaluate the merits of a complaint against a program AND/OR

c) As a diagnostic visit to explore the factors underlying deterioration in selected aspects of a program's performance identified during the review of the Unsolicited Complaint.

The EUFAC representative(s) involved in the site visit prepare a report that encompasses the selected aspect(s) of the program and other information identified during the site visit that are relevant to resolving the Unsolicited Complaint. All information in the site visit report may be considered by the EUFAC.

2.1.2 Focused Site Visit – Resolution of Appeal

a) A focused site visit to resolve an appeal assesses selected aspects of a program identified by the

EUFAC, following an Appeals Process, that remain unresolved and may be used to address selected aspects of the program in question that were identified during the appeal.

b) The EUFAC representative(s) involved in the site visit prepare a report that encompasses the selected aspect(s) of the program and other information identified during the site visit that are relevant to resolving the appeal. All information in the site visit report may be considered by the EUFAC.

2.1.3 Site Visit for Alleged Egregious Violations

a) The EUFAC may conduct a site visit at any time while a program holds a EUFAC accreditation status, if an alleged egregious violation is identified.

b) The size and membership of the site visit team and the format and scope of the visit are determined by the Chair and Executive Director of the EUFAC.

c) The EUFAC representative(s) involved in the site visit prepare a report for the EUFAC that addresses all aspects of the alleged egregious violation.

3.0 Reduction in Fellow Complement

The complement of fellows in a program must be commensurate with the total capacity of the program to provide each fellow with sufficient educational experience. The EUFAC may indicate that a program is approved to educate a specific number of fellows as a maximum and/or a specific number. The EUFAC may reduce the approved fellow complement if a program cannot demonstrate the capacity to provide each fellow with a sufficient educational experience. This is an adverse accreditation decision and a program may appeal this decision.

4.0 Procedures for Alleged Egregious Events

The occurrence of an alleged egregious accreditation violation affecting programs must be reported to the EUFAC Chair and Executive Director of EUFAC. When the EUFAC Chair and Executive Director determine that the matter disclosed is of sufficient importance and urgency to require a rapid response, the following procedures shall be initiated:

a) The EUFAC Chair and Executive Director may request a formal and prompt response from the appropriate responsible individual(s). The EUFAC Chair and Executive Director may decide that a review of the affected institution or program under this policy should occur or recommend that the matter be referred for action.

b) The EUFAC may hold an emergency meeting to review and discuss the matter for determination of action.

c) Recommendations from EUFAC may include the following:

1. No change in program accreditation status
2. Change in program accreditation status
3. Change in fellow complement

d) If an adverse accreditation decision is rendered, the institution or program may request reconsideration by the EUFAC. This request must be made in writing to the EUFAC Chair and Executive Director within 30 days of receipt of written notification of alleged egregious accreditation violation.