

<p align="center"><b>The University of Alabama Hospital</b> Graduate Medical Education Policy and Procedure</p>	<p align="center">GMEC Approved Date: May 7, 2024</p>
<p align="center"><b>GME Recruitment, Selection and Promotion Policy</b></p>	<p align="center">Next Review Date: Spring 2025</p>

**A. RESIDENT/FELLOW ELIGIBILITY AND REQUIREMENTS FOR RESIDENCY TRAINING**

It is the responsibility of the program director to ensure all applicants under consideration for residency and fellowship training in the program meet the eligibility requirements of the Hospital and the Accreditation Council for Graduate Medical Education (ACGME) detailed below. The enrollment of non-eligible residents/fellows may be cause for withdrawal of accreditation of the program by the ACGME. Only applicants who meet the following qualifications are eligible for appointment to accredited residency/fellowship programs sponsored by the Hospital:

1. **Medical Education:** Only applicants who meet one of the following criteria may be accepted for residency training in accredited programs sponsored by the Hospital:
  - a) Graduates of medical schools in the United States and Canada accredited by the Liaison Committee on Medical Education (LCME).
  - b) Graduates of colleges of osteopathic medicine in the United States accredited by the American Osteopathic Association Commission on Osteopathic College Accreditation (AOACOCA).
  - c) Graduates of medical schools outside the United States and Canada (international medical graduates) must possess a currently valid certificate from the Educational Commission for Foreign Medical Graduates (ECFMG) prior to appointment, or, have a full-unrestricted license to practice medicine in a U.S. licensing jurisdiction in his or her current ACGME specialty-/subspecialty program.
  
2. **Entry of Foreign Medical Graduates to the United States:** The entry of foreign-born graduates of non-U.S. medical schools to the United States is governed by the Department of State, and U.S. Citizenship and Immigration Services (USCIS) and approves their work authorization. It is a violation of federal law to provide employment to a non-U.S. citizen who has not received work authorization from USCIS.
  - a) International Scholar and Student Services (ISSS) must be notified of all non-US citizens accepted for residency training. Contact ISSS at (205) 934-1528 or email [iss@uab.edu](mailto:iss@uab.edu) as soon as you are considering a non-US citizen for residency or fellowship training. ISS will strategize with you about processing the candidate's current or future immigration status and will advise on the timing and process of the paperwork required for foreign nationals to participate in residency or fellowship training at UAB. Due to sensitive timing issues around obtaining a Social Security number and applying for an Alabama medical license, an H-1B visa may not always be the best (or even viable) option.
  - b) Program Directors considering applicants born outside of the US should be aware that the current immigration landscape is very different from in the past, and that ISSS is the best resource for determining whether J-1 or H-1B is the best option for your candidate. Please do NOT offer or promise a particular immigration status to a candidate without consulting ISSS.

- c) International medical graduates must hold a currently valid certificate from the Educational Commission for Foreign Medical Graduates (ECFMG), which sponsors all residents and fellows in the US for J-1 visas. If a candidate has not received the Step 3 USMLE certificate, an H-1B visa is not an option. After consulting ISSS, program directors may communicate the visa type or immigration status agreed upon with ISSS to the international applicant. Residency program directors may ultimately choose which visa types to accept, after consultation with ISSS and must communicate it to applicants.
- 3. Prerequisite Residency Training:** All applicants must satisfy any requirements for prerequisite residency training, as established by the relevant Residency Review Committee and/or certifying board for the specialty.
- a) **Residency Programs:** All prerequisite post-graduate clinical education required for initial entry or transfer into ACGME-accredited residency programs, must be completed in:
    - i. ACGME-accredited residency programs,
    - ii. AOA-approved residency programs,
    - iii. Royal College of Physicians and Surgeons of Canada (RCPSC)-accredited or
    - iv. College of Family Physicians of Canada (CFPC)-accredited residency programs located in Canada
    - v. Residency programs with ACGME International (ACGME-I) Advanced Specialty Accreditation
  - b) **Fellowship Programs:** The ACGME CPRs (Fellowship), include two choices for fellowship eligibility. Program Directors must be familiar with the Resident Review Committee’s requirements.

All prerequisite post-graduate clinical education required for initial entry or transfer into ACGME-accredited residency programs, must be completed in:	
Option 1	Option 2
ACGME-accredited residency programs,	ACGME-accredited residency programs,
AOA-approved residency programs,	AOA-approved residency programs,
Residency programs with ACGME International (ACGME-I) Advanced Specialty Accreditation,	
Royal College of Physicians and Surgeons of Canada (RCPSC)-accredited or	
College of Family Physicians of Canada (CFPC)-accredited residency programs located in Canada	

Residency programs and Fellowship programs (Option 1) must receive verification of each resident’s level of competency in the required clinical field using ACGME, CanMEDS, or ACGME-I Milestones evaluations from the prior training program upon matriculation. Program Directors must review Residency Review Committee and/or certifying board requirements to ensure compliance. Fellowship programs (Option 2) must receive verification of training through ACGME milestones.

4. **Eligibility Exception:** Some Residency Review Committees allow exceptions to the eligibility requirements for exceptionally qualified international graduate applicants who does not satisfy the eligibility requirements listed in III.A.1-III.A.2. Program Directors must review their program specific requirements. The GMEC must approve exceptional candidates prior to placing the applicants on your rank list. If approved and applicants matriculate, the program's CCC must review the resident/fellow within 12 weeks.
  - a) Residency Programs: A Review Committee may permit the eligibility exception if the specialty requires completion of a prerequisite residency program prior to admission.
  - b) Fellowship Programs: A Review Committee may permit the eligibility exception if the specialty chooses Option 1 in the CPRs (Fellowship) Section III.A.1.
5. **Resident/Fellow Transfer:** If a resident/fellow transfers from a residency program at another institution, the following is needed: a) written permission from the Program Director that the resident/fellow has authorization to contact our institution, b) review of competency-based evaluations from the transferring institution, c) verification of the previous educational experiences and a statement regarding the resident/fellow's performance evaluation must be received prior to acceptance into a UAB residency program.
6. **Health Appointment in Employee Health:** All newly appointed residents/fellows must complete and pass a pre-employment health exam, within 30 days of the date of employment (see Section V.D. for details).
7. **United States Medical Licensing Examinations (USMLE) or Comprehensive Osteopathic Medical Licensing Examination (COMLEX):** All residents/fellows must comply with the requirements for passing USMLE Steps 2 and 3 or COMLEX Levels 2 and 3 as outlined in Section V.K. and V.L. of this manual.
8. **Alabama Medical License:** All residents/fellows must obtain an unrestricted Alabama license to practice medicine as soon as they meet the minimum postgraduate training requirements stipulated by the Alabama Board of Medical Examiners (see Section V.M. for details).

## B. SELECTION OF RESIDENTS/FELLOWS

1. Programs should select from among eligible applicants based on residency program-related criteria such as preparedness, ability, aptitude, academic credentials, communication skills, and personal qualities such as motivation and integrity. Programs must not discriminate with regard to sex, race, age, religion, color, national origin, disability, veteran status, or any other applicable legally protected status.
2. The program director, in conjunction with the program's Education Committee and/or teaching faculty, reviews all applications, and personal interviews are granted to those applicants thought to possess the most appropriate qualifications, as determined by guidelines established by the program.
3. Each applicant who is invited for an interview must be informed, in writing or by electronic means, of the terms, conditions, and benefits of appointment, including financial support; vacation, leaves of absence, including medical, parental, and caregiver leaves of absence; professional liability, hospitalization, health, disability and

other insurance provided for the residents/fellows and their families; the conditions under which call rooms, meals, laundry services, or their equivalents are to be provided; information related to the applicant's eligibility for the relevant specialty board examination.

4. In selecting from among qualified applicants, it is strongly recommended that all programs participate in an organized matching program when such is available for the specialty.
  - a) Programs who recruit U.S. medical school seniors must participate in the National Resident Matching Program.
  - b) The program director is responsible for verifying the eligibility of all candidates under serious consideration prior to the submission of rank order lists or other offer of a residency position.
5. An offer for residency training is extended directly to the applicant by the program director or his/her designee, through a letter of offer.
6. Immediately following receipt of the results of the Match, the program director is responsible for notifying the Graduate Medical Education Department of all candidates accepted and providing a copy of each applicant's file for the Hospital's permanent record. Each resident/fellow's file must include the following:
  - a) Documentation of completion of medical school (copy of medical school diploma, dean's letter),
  - b) Copies of two letters of recommendation,
  - c) Current email address,
  - d) Inclusive dates of appointment,
  - e) Postgraduate year of appointment

### **C. INITIAL RESIDENT/FELLOW APPOINTMENT (Contract)**

The following guidelines and procedures shall govern the appointment of physicians to graduate medical education programs sponsored by the Hospital:

1. The appointment of a physician to a residency position shall be for the sole purpose of pursuing postgraduate medical education.
2. The initial appointment shall be for one year and is made upon recommendation of the program director with approval of the Designated Institutional Official.
3. The resident/fellow must be appointed to the postgraduate year for which he/she is qualified as specified by the certifying board of the specialty. Previous postgraduate training in another specialty will not be taken into consideration unless such training is credited by the certifying board of the specialty of enrollment. The Graduate Medical Education Department must be provided with a letter from the certifying board which indicates the number of months or years credit that will be given before a resident/fellow's postgraduate year can be adjusted.
4. A physician appointed to a residency position without compensation must demonstrate health insurance coverage substantially equivalent to that offered by the institution, obtain professional liability insurance through the UAB Office of Risk Management and Insurance, and comply with all requirements and conditions for employment outlined

- in this manual. Such appointment must be approved in advance by the Designated Institutional Official of the Hospital.
5. The program director, or his/her designee, is responsible for initiating the personnel form required for the appointment of a resident/fellow. The completed personnel form ("Oracle document"), and resident/Fellow contract ("Resident Agreement") must be forwarded to the Graduate Medical Education Department for Hospital review and approval. A resident/fellow's appointment is contingent upon receipt of a completed Resident/fellow Agreement and resident/fellow compliance with requirements outlined in Section III.A. and Section V. of this manual.
  6. An international medical graduate (IMG) appointed to a residency position must meet all applicable educational requirements, possess a visa which permits participation in a graduate medical education program, possess a valid ECFMG certificate, and meet the licensure requirements of the State of Alabama. These documents must be reviewed and found to be in order by the Graduate Medical Education Department prior to the commencement of any medical activity within the Hospital.
  7. A UAB Health System Medical and Dental Staff Code of Conduct for Professional Behavior Acknowledgment Form must be signed by the resident/fellow and submitted along with the "Resident/Fellow Agreement."

## SECTION V - RESIDENT/FELLOW RESPONSIBILITIES AND CONDITIONS OF APPOINTMENT

- A. Compliance with Institutional Policies and Procedures:** All residents/fellows are subject to the personnel and administrative policies and procedures of the Hospital and the University of Alabama at Birmingham, except as specifically modified by the GMEC. A resident/fellow's appointment is contingent upon compliance with said policies. All Hospital standards and policies are available through the SPP-SCR Website at <https://scr.hs.uab.edu/>. In addition, the University of Alabama at Birmingham's Sexual Harassment Policy and The University of Alabama School of Medicine Harassment Policy are also provided in Appendix 6 of this manual. All residents/fellows are provided with a copy of the Graduate Medical Education Policies and Procedures manual and are expected to read and become familiar with said policies.

As a condition of promotion/advancement, the resident/fellow is responsible for completing all mandatory education required by the Sponsoring Institution (i.e., compliance training, Joint Commission education, etc.).

- B. Hospital Orientation for New Residents/Fellows:** The orientation session for new residents/fellows is designed to facilitate each resident/fellow's entry into the UAB system, provide education on policies and procedures, and expedite the completion of all required paperwork. Newly-appointed residents/fellows are expected to attend orientation if at all possible. Residents/Fellows unable to attend orientation are required to report to the Graduate Medical Education Department for processing and instructions for completion of the required paperwork.
- C. Contract with the University of Alabama Hospital (Resident/Fellow Agreement):** A "Resident Agreement" must be completed for all residents/fellows upon entry into a residency program and a "Resident Agreement" for each year of training thereafter. The agreement must be signed by the resident/fellow, program director, and the DIO and the original agreements maintained as a part of the Hospital's permanent records.



- D. Employee Health Appointment:** All newly-appointed residents/fellows must have an Employee Health Visit; Residents/Fellows who fail to complete their physical examination within 30 days of the date of employment are subject to suspension. Residents/Fellows should contact Employee Health at (205) 934-3675 to schedule an appointment to have a TB skin test and screening for childhood diseases. Reports from examinations conducted by private physicians or at other facilities are not acceptable.
- 1. Immunization for Hepatitis-B and Childhood Diseases:** Newly-appointed residents/fellows are screened for the need for immunization for hepatitis-B and childhood diseases as a part of the pre-employment physical. Immunizations are provided at no cost to the resident/fellow by Employee Health. COVID-19 vaccinations will be offered to newly appointed residents/fellows through Employee health. Additional information may be obtained from Employee Health at (205) 934-3675.
  - 2. COVID-19 Vaccination:** UAB Health System requires that all employees to be vaccinated against COVID-19 as a condition of employment. All new hires will be required to have COVID-19 vaccines, barring an approved medical or religious exemption.
  - 3. Flu Vaccine:** All residents/fellows are required to have a flu vaccine annually thereafter by Employee Health, located in Room SW123, Spain Wallace. Additional information on testing may be obtained from Employee Health at (205) 934-3675.
  - 4. Physical Examination/Pre-Employment Drug Screen.** Resident understands that failure to complete and successfully pass a health screening examination and pre-employment drug screen performed by the Hospital at the time of Resident's initial appointment will result in suspension or termination of his/her appointment as a resident.
- E. Background Checks** are performed during the onboarding process for new residents/fellows.
- F. Advanced Life Support and Basic Life Support Certification:** Residents/fellows are required to maintain certification in life support procedures appropriate for their specialty (Advanced Cardiac Life Support (ACLS), Advanced Trauma Life Support (ATLS), Pediatric Advanced Life Support (PALS) and/or Neonatal Resuscitation Program (NRP) and Basic Life Support (BLS) throughout residency training. Courses for residents/fellows new to UAB are offered in June of each year, and courses are offered throughout the year for residents/fellows requiring recertification. There are two parts of recertification; a didactic portion and skills assessment. Current GME residents/fellows requiring recertification will be assigned prior to expiration a learning module in the UAB Learning System and will be asked to complete the skills assessment through the UAB Office of Interprofessional Simulation For Innovative Clinical Practice located in Jefferson Tower Procedural Skills Lab, 2<sup>nd</sup> Floor. The Sim Lab is open 24/7 and residents/fellows will need their UAB ID badge to access the simulation. Further information may be obtained by contacting the Graduate Medical Education Department at (205) 934-4793.
- G. Identification Badge:** Newly-appointed residents/fellows will be issued an identification badge bearing their picture. This identification badge should be worn at all times while in the Hospital. A \$15.00 replacement fee is charged for replacement badges. Identification badges must be returned upon completion of residency training or termination of employment at the Hospital. HRM/Hospital Support Services is located in the Jefferson Towers Building, Room 323A 165. Office hours are 8:30 a.m. - 5:00 p.m., Monday through Friday.
- H. Patient Information and Clinical Tasks System (IMPACT) Training:** Residents/Fellows are required to complete a training course prior to being issued access numbers for the IMPACT system. Courses are offered during orientation and throughout the year. Additional

information can be obtained by contacting the IMPACT Scheduling Coordinator at (205) 934-1332, Room 270, General Services Building.

- I. **Professional Liability Insurance:** Newly appointed Residents/Fellows are provided with professional liability (malpractice) coverage throughout residency training, and the premiums are paid by the source of salary support. Coverage is provided through the University of Alabama Professional Liability Trust Fund (PLTF), administered by the UAB Office of Risk Management and Insurance. See Section IV.F for more details.
- J. **United States Medical Licensing Examinations (USMLE)**
  1. **USMLE Step 2:** All residents/fellows with M.D. degrees, regardless of postgraduate year, must possess a passing score for the Clinical Knowledge part of Step 2 by completion of the third month after entering residency training at UAB. For example, if a residents/fellow begins the PG year on July 1st, the deadline for successful completion of the exam is September 30th of the same year. The Clinical Skills part of Step 2 was eliminated in 2021.
  2. **USMLE Step 3:** All residents/fellows with M.D. degrees must possess a passing score for the USMLE Step 3 by completion of the fourth month of postgraduate year two. The first attempt at the exam must occur before the end of the PGY1 year. Notwithstanding the foregoing, if a resident/fellow transfers to UAB from a non-UAB program after PG year two, the resident/fellow must possess a passing score for USMLE Step 3 by completion of the fourth month after their transfer to UAB. (For example, if a resident/fellow begins the postgraduate year two on July 1st, the deadline for successful completion of the exam is October 31st of the same year.)

For further clarification, in the case of the Oral Maxillofacial Surgery, the resident must possess a passing score for USMLE Step 3 by the end of the PGY2 due to the program format.
- K. **Comprehensive Osteopathic Medical Licensing Examination (COMLEX)**
  1. **COMLEX Level 2:** All residents/fellows with D.O. degrees, regardless of postgraduate year, must possess a passing score for the Computerized Cognitive Evaluation parts of the COMLEX Level 2 by completion of the third month after entering residency training at UAB. **As of 2021, the Level 2 Performance Evaluation part has been suspended indefinitely.**
  2. **COMLEX Level 3:** All residents/fellows with D.O. degrees must possess a passing score for the COMLEX Level 3 by completion of the fourth month of postgraduate year two. Notwithstanding the foregoing, if a resident/fellow transfers to UAB from a non-UAB program after postgraduate year two, the resident/fellow must possess a passing score for COMLEX Level 3 by completion of the fourth month after their transfer to UAB. (For example, if a resident/fellow begins the postgraduate year two on July 1st, the deadline for successful completion of the exam is October 31st of the same year.)
- L. **Licensure:** All residents/fellows (graduates of American and international medical schools) must apply for and obtain an unrestricted Alabama license to practice medicine as soon as they meet the minimum postgraduate training requirements stipulated by the Alabama Board of Medical Examiners. In addition, residents/fellows who are graduates of international medical schools must apply for and obtain a limited Alabama license no later than 18 months from the start of postgraduate training (PGY 1) and this limited license must be maintained until an unrestricted Alabama license is obtained, or they complete the program, whichever occurs first.

All residents/fellows will be required to demonstrate to the Graduate Medical Education Department that they have obtained and maintained a medical license (unrestricted and/or limited) with the Alabama Board of Medical Examiners, after meeting eligibility requirements, but, in no event later than 18 months from the start of their postgraduate training. For further clarification, the license must be active no later than 18 months from the start of postgraduate training (and not delayed to become active on January 1<sup>st</sup> of the next calendar year). A copy of the resident/fellow's current unrestricted and /or limited medical license must be submitted to the Graduate Medical Education Department on an annual basis at the time the resident/fellow's contract is renewed for each academic year.

Failure to meet any of these licensing requirements will result in the resident/fellow being placed on administrative probation. Should the resident/fellow fail to meet the terms of the probation period, the resident/fellow's appointment will be revoked. Application forms for licensure may be obtained by contacting:

Alabama Board of Medical Examiners  
Medical Licensure Commission  
P. O. Box 946  
Montgomery, AL 36101  
(848 Washington Avenue, Montgomery, AL 36104)  
Telephone: (800) 227-2606

**M. Alabama Controlled Substances Certificate/DEA Number:**

An Alabama Controlled Substances Certificate (ACSC) and Drug Enforcement Administration (DEA) number is required in order for physicians to write inpatient or outpatient prescriptions for controlled substances. Residents/fellows may rely on the Hospital's institutional DEA number (with a unique suffix assigned to each resident/fellow) for the first 18 months of residency training, but not thereafter.

In clinical training programs where controlled substance are prescribed, each resident/fellow must register with the Drug Enforcement Administration (DEA) and obtain an individual DEA number and with the Alabama Board of Medical Examiners for an Alabama Controlled Substances Certificate (ACSC) when they obtain their Alabama license, but on no event, later than 18 months from the start of their postgraduate training. A copy of the DEA number and ACSC should be sent to the Graduate Medical Education Department. Registration forms for the Alabama Controlled Substances Certificate are included with application materials for licensure, and information on federal DEA registration is found at: <https://www.deadiversion.usdoj.gov/>

Residents/Fellows in a training program where controlled substances are not prescribed are not required to obtain a DEA number or ACSC. Residents/fellows in these programs cannot use another physician's DEA number or ACSC.

A list of residency training programs in which controlled substances are prescribed can be found in Appendix 4.

Failure to meet any of these requirements will result in the resident/fellow being placed on administrative probation. Should the resident/fellow fail to meet the terms of the probation period, the resident/fellow's appointment will be revoked.

**Note:** If you will utilize your personal DEA number only within the scope of your training program and **will not utilize it for external moonlighting purposes**, you are eligible for a fee exemption for your DEA registration. To request approval for fee exemption, complete and sign the form "Request for Fee Exemption-DEA Registration" and submit it to your Program



Director, Department Chair and DIO for approval. Please contact the GME Office for additional information on this process.

**N. Moonlighting:** Specific policies concerning moonlighting may vary from program to program, and residents/fellows may undertake moonlighting activities only in accordance with the policies and guidelines established by the individual residency programs. The following policies apply to moonlighting by residents/fellows in all programs:

1. Residents/Fellows cannot be required to engage in moonlighting activities.
2. PGY-1 residents are not permitted to moonlight.
3. J-1 visa holders are not permitted to moonlight.
4. Any resident/fellow engaged in moonlighting must notify the Program Director of such desired activities and receive approval. The Program Director must acknowledge in writing or electronically that she/he is aware that a resident/fellow is moonlighting and their approval of such activities. This information must be maintained in the resident/fellow's MedHub file.

The GME Moonlighting Policy is in Section VIII.L of this manual and contains detailed information on requirements and specific instructions on how to complete a request to obtain approval to moonlight.

**O. Participation in Educational and Professional Activities:** The Hospital and its sponsored programs are committed to providing an educational and scholarly environment for the conduct of graduate medical education, which facilitates each resident/fellow's professional and personal development. Each program is required to define, in accordance with the Program Requirements established for the discipline, the specific knowledge, skills, and attitudes required and provide educational experiences as needed for their residents/fellows to demonstrate the following:

1. Patient care that is compassionate, appropriate, and effective for the treatment of health problems and the promotion of health;
2. Medical knowledge about established and evolving biomedical, clinical, and cognate (e.g., epidemiological and social-behavioral) sciences and the application of this knowledge to patient care;
3. Practice-based learning and improvement that involves investigation and evaluation of their own patient care, appraisal and assimilation of scientific evidence, and improvements in patient care;
4. Interpersonal and communication skills that result in effective information exchange and teaming with patients, their families, and other health professionals;
5. Professionalism, as manifested through a commitment to carrying out professional responsibilities, adherence to ethical principles, and sensitivity to a diverse patient population; and
6. Systems-based practice, as manifested by actions that demonstrate an awareness of and responsiveness to the larger context and system for health care and the ability to effectively call on system resources to provide care that is of optimal value.

**D. PROMOTION/ADVANCEMENT OF RESIDENTS/FELLOWS**

1. The promotion/advancement of a resident/fellow from one postgraduate level to another in a graduate medical education program generally occurs following the satisfactory completion of each 12-month period of graduate medical education.
2. Such promotion/advancement is made upon recommendation by the program director and is regarded as the same process as the initial appointment award.
3. For each resident/fellow advanced, the program director is responsible for completing the appropriate personnel form ("Oracle document") indicating the change in postgraduate year, dates of appointment, and adjustment in salary. The personnel form must be routed to the Graduate Medical Education Department for Hospital review and approval.
4. A resident/fellow contract ("Resident Agreement") signed by the resident/fellow and program director must be completed and forwarded to the Graduate Medical Education Department for Hospital review and approval.
5. A UAB Health System Medical and Dental Staff Code of Conduct for Professional Behavior Acknowledgment Form must be signed by the resident/fellow and submitted along with the "Resident Agreement".
6. As a condition of promotion/advancement, the resident/fellow is responsible for completing all mandatory education required by the Sponsoring Institution (i.e., compliance training, Joint Commission education, etc.) and obtaining a flu vaccine each year as outlined in Section V. "Resident/Fellow Responsibilities and Conditions of Appointment."
7. The GME Office will verify that the resident/fellow has completed all mandatory education required by the Sponsoring Institution and that current flu vaccine documentation is available in Employee Health before submitting the contract to the DIO for approval.

In addition, residents/fellows are expected to:

1. Develop a personal program of learning to foster continued professional growth with guidance from the teaching staff;
2. Participate fully in the educational and scholarly activities of their program and, as required, assume responsibility for teaching and supervising other residents/fellows and students;
3. Participate in appropriate institutional committees and councils whose actions affect their education and/or patient care;
4. Participate in an educational program regarding physician impairment, including substance abuse.
5. Submit to the program director or the designated institutional official at least annually confidential written evaluations of the faculty and of the educational experience.