

## Comparison of Proposals to Limit Resident Work Hours

	H.R. 3236/S. 2614 <sup>1</sup>	OSHA Petition <sup>2</sup>	ACGME <sup>3</sup>	AMA <sup>4</sup>	AAMC <sup>5</sup>
<b>Entire Specialties Can be Exempted</b>	No	No	Yes <sup>6</sup>	No	No
<b>Maximum Hours per Week</b>	80 hours, no averaging	80 hours, no averaging	88 hours averaged over 4 weeks <sup>7</sup>	84 hours averaged over 2 weeks <sup>8</sup>	80 hours, no averaging
<b>Maximum Shift Length</b>	24 hours	24 hours	30 hours <sup>9</sup>	30 hours <sup>9</sup>	24 hours
<b>Minimum Time Off Between Shifts</b>	10 hours	10 hours	10 hours	10 hours	8 hours
<b>Maximum On-Call Frequency</b>	Every third night, no averaging	Every third night, no averaging	Every third night, averaged over 4 weeks	Every third night, averaged over 2 weeks	Every third night, averaged over 4 weeks
<b>Mandatory Off-Duty Time</b>	24 hours off per week, 1 weekend off per month, no averaging	24 hours off per week, no averaging	24 hours off per week, averaged over 4 weeks	24 hours off per week, averaged over 2 weeks	24 hours off per week, no averaging
<b>Whistleblower Protections</b>	Yes	Yes	No	No	No
<b>Enforcement</b>	Civil Penalties	Civil Penalties	Voluntary approach <sup>10</sup>	Defers to ACGME	None mentioned
<b>Public Disclosure of Violating Hospitals</b>	Yes	Yes	No	No	No
<b>Provides for Additional Funding</b>	Yes	Not applicable	No	No	no

<sup>1</sup> <http://thomas.loc.gov/>; Type in the appropriate bill number.

<sup>2</sup> <http://www.citizen.org/publications/release.cfm?ID=6771>

<sup>3</sup> <http://www.acgme.org/new/wkgreport602.pdf>

<sup>4</sup> <http://www.ama-assn.org/ama1/upload/mm/annual02/RefcomC.Annot.doc>

<sup>5</sup> <http://www.aamc.org/hlthcare/gmepolicy/gmepolicy.pdf>

<sup>6</sup> If a specialty “believes it cannot conduct its educational activities within the proposed constraints,” it can apply to the ACGME for an exemption.

<sup>7</sup> Individual programs may apply to their sponsoring institution’s Graduate Medical Education Committee for up to a 10% increase over the 80 hour limit if they can provide a “sound educational rationale.”

<sup>8</sup> Under certain circumstances, a 5% increase over the 80 hour limit may be granted.

<sup>9</sup> A 24-hour limit on in-house call duty, with an added period of up to 6 hours for transfer of patient care, educational debriefing and didactic activities.

<sup>10</sup> The ACGME proposes voluntary enforcement of their guidelines by intensifying information collection, shortening residency review cycles, increasing their response time to alleged violations, and enhancing programs’ and institutions’ accountability for compliance.