

LEGAL UPDATES

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ACGME Proposes Major Revisions to Common Program Requirements

On September 8, 2026, the Accreditation Council for Graduate Medical Education (ACGME) proposed major revisions to its common program requirements for medical residency and post-doctoral education programs—a process it undertakes approximately every 10 years. The ACGME is accepting comments on the proposed revisions through October 22, 2026. The proposed effective date for the changes is July 1, 2028.

Notable Changes

Overall, the ACGME proposes to significantly reduce the number of requirements by 43%. The ACGME indicated that reductions are intended to decrease complexity and prescriptive process-based requirements, provide programs with additional flexibility, and avoid impeding small programs with requirements that are not necessary or relevant to them. Programs would be newly required to adopt policies to address the needs of pregnant residents and to describe the appropriate level of supervision to be provided for all patient care activities.

Timeline for Finalizing Major Revisions

September 8, 2026: Proposed revisions publicly posted.

October 22, 2026: Comments on proposed revisions are due to the ACGME.

June 2027: Final draft of major revisions will be considered at Committee and Board meetings.

July 1, 2028: Revised common program requirements take effect.

The ACGME's common program requirements for fellowships are also undergoing major revisions. Those proposed revisions are expected to be

released in early 2027 for public comment, reviewed for final approval in September 2027, and effective July 1, 2028.

Recommended Actions

Graduate medical education (GME) programs accredited by the ACGME should consider reviewing the proposed revisions and begin familiarizing themselves with the changes. Programs may submit comments to the ACGME through October 22. Looking ahead to the 2027-2028 academic year, programs should expect an increased need to review and revise their GME policies and to educate faculty, staff, and residents/fellows on program updates to be effective for the 2028-2029 academic year.

Contact Us

If you have questions about the ACGME's proposed revisions to the Common Program Requirements, the potential impact on your graduate medical education programs, or the steps your institution can take to prepare for implementation, please contact Anne Cartwright, Robert Hess, Anna DuBois, Anna Schroer, or your Husch Blackwell attorney.

This client alert is provided for general informational purposes only and does not constitute legal advice. The application of the concepts discussed above depends on the specific facts, applicable collective bargaining agreements, benefit plan documents, corporate structure, tax elections, and the laws of the relevant jurisdictions, and should be discussed with counsel before taking action.