

SUBJECT: Extra Duty (Moonlighting) Policy

The Accreditation Council for Graduate Medical Education Institutional Requirements requires that the Sponsoring Institution have policies regarding professional activities outside the educational program.

POLICY STATEMENT:

The Accreditation Council for Graduate Medical Education Institutional Requirements requires that the Sponsoring Institution have policies regarding professional activities outside the educational program.

Housestaff must adhere to State University System Guidelines regarding outside activities/outside employment, conflict of interest, and additional compensation. Such outside activity includes private practice, private consultation, teaching, research, or other employment outside State government which is not part of assigned University duties and for which the University provides no compensation. Individual housestaff programs are accredited by their Residency Review Committee (RRC) and must adhere to RRC requirements regarding outside employment. Although RRC's vary, the general theme is that any professional activities which are outside the established educational program must not interfere with the resident's established educational process or the quality care of patients. Residents shall not be required to engage in professional activities outside the educational program.

DESCRIPTION

1. Each program must have a policy regarding additional duty employment which meets RRC requirements and University of Florida College of Medicine policy. There are two categories of extra duty activity defined in University of Florida policy:
 - a. Programmatic: These activities are initiated by departmental training programs to provide additional clinical experiences within the program specialty. These activities usually occur at campus health care sites. Supplemental salary income is provided by the University to housestaff who participate in programmatic activities.
 - b. Non-programmatic: These activities are initiated by the resident and do not involve any agreement between the College of Medicine and an outside employer. Residents must be licensed for unsupervised medical practice in the state where such activity occurs and attest to adequate professional liability coverage. In no circumstance is the resident to hold him or herself out as an employee of the University while engaged in such activities.

2. Each program's rules regarding outside and extracurricular employment must be reviewed during the periodic internal program reviews and subsequently approved by the GMEC. The program director is ultimately responsible for assuring that outside activities do not interfere with the educational program and should monitor all outside activities of the residents in their program on an ongoing basis. Program Directors are required to prospectively approve any programmatic and non-programmatic activities, to be aware of the number of hours per week such activities shall consume.

Additionally, activities considered to be outside activity should be reviewed and approved by the Director of Conflict of Interest (352.273.7508), <http://coi.med.ufl.edu/>

Programmatic & Non-Programmatic includes time spent in patient care, and consideration of patient and resident safety demand that these hours must be counted toward the residents' 80 hour per week maximum, counted toward residents' maximum continuous duty period (24 hours) All Programmatic & Non-Programmatic must be completed at least 10 hours prior to the next scheduled residency duty period. Non-programmatic outside activities should be documented in New Innovations for tracking purposes.

3. A summary annual report of programmatic and non-programmatic professional employment of housestaff will be provided by the program director to the GMEC indicating that the program director is aware of the activities and approves.
4. All housestaff participating in non-programmatic outside professional employment must first complete a Non-Programmatic Professional Activity Form for approval and signature by their chairperson or program director and the Associate Dean, GME before undertaking such activity – Each episode of anticipated service must be included. Requests may be made for activities spanning up to one month, but in no circumstance will blanket approval for periods longer than one month be permitted. **(See attached form)**
5. Programs, departments and services will be responsible for enforcement of this policy. **Violation by the resident may lead to immediate dismissal.**
6. Under federal statutes no moonlighting (programmatic or non-programmatic) is permissible for housestaff holding a J1 or H1-b Visa.
7. PGY-1 Housestaff may not moonlight. (CPR VI.G.2.C)

Note: No housestaff shall moonlight while on back-up call, post-call, nor pre-call. No housestaff shall moonlight while on an inpatient rotation, nor while on float. Under no circumstances is a housestaff member allowed to moonlight neither while on medical leave nor after calling in for a sick day. The housestaff member must bear in mind that all programmatic moonlighting constitutes part of the 80 hour work week. Under no

circumstance is the housestaff member to exceed the 80 hour total. The housestaff member must document to the Residency Director what their weekly hours are, including breakdown of the residency/fellowship duty hours and moonlighting duty hours.

The ACGME very clearly stipulates that under no circumstance is moonlighting to interfere with the housestaff member's responsibilities to their residency/fellowship. Moonlighting is a privilege, which can and will be permanently revoked if a housestaff is found to be derelict in their responsibilities. Continuing to moonlight after this privilege has been revoked will constitute grounds for immediate dismissal from the residency/fellowship program.

Reviewed and Approved
Graduate Medical Education Committee (GMEC)
May 2016