



Office of Graduate Medical Education

GRADUATE MEDICAL EDUCATION COMMITTEE POLICY NO. 11

A: SUBJECT: Moonlighting Activities

B: EFFECTIVE DATE: July 20, 2016 (R)

C: POLICY:

Graduate Medical Education Trainees (GME Trainees hereafter) should not be diverted from their primary responsibilities, including their required educational activities and patient care duties by engaging in any moonlighting activities.

- **Internal moonlighting** is defined as voluntary, compensated, medically-related work (not related to training requirements) performed within the University of Virginia Medical Center or its affiliated institutions. This includes clinical or non-clinical work performed by a GME Trainee outside the time spent in training activities.
- **External moonlighting** is defined as voluntary, compensated, medically-related work performed outside the University of Virginia Medical Center or its affiliated institutions. This includes clinical or non-clinical work performed by a GME Trainee outside the time spent in training activities.

D. PROCEDURES:

1. Each residency and fellowship training program must have a written policy on moonlighting. Each program policy may include specific circumstances under which moonlighting activities are allowed and the procedure for requesting program director and Designated Institutional Official (DIO) approval. Programs and departments may have policies which are more restrictive than the institutional policy. Programs must not require GME Trainees to engage in moonlighting activities. Each department's policy regarding moonlighting activities must be well-publicized to its GME Trainees (e.g., handout materials; intranet).
2. PGY1 GME Trainees are not permitted to moonlight.
3. Should a GME Trainee be approved by his/her program director for moonlighting, then an application to moonlight must be submitted to the Graduate Medical Education Office (GMEO) no less than 60 days prior to the intended start date of the moonlighting activity. Applications will be referred to the DIO for review and approval. **GME Trainees shall not begin moonlighting prior to receiving DIO approval.**
4. Approval of moonlighting by DIO is subject to the program director's attestation that the proposed moonlighting does not interfere with the ability of the GME Trainee to achieve the goals and objectives of the required educational program, and that the GME Trainee is in good standing in his/her training program.
5. Approval for moonlighting may be valid for an academic year beginning in the 2016-2017 academic year. Any granted moonlighting shall expire on the proposed ending date or June 30th each year, whichever comes first. A new application must be submitted at the beginning of each academic year.

6. The program director has primary responsibility to monitor fatigue levels of all GME Trainees participating in **all** moonlighting activities. Additionally, faculty members and GME Trainees must be educated to recognize the signs of fatigue and sleep deprivation and in alertness management and fatigue mitigation processes. Each GME programs must adopt policies to prevent and counteract potential negative effects of fatigue on patient care and learning.
7. Approval for moonlighting can be revoked at any point by the program director or DIO in any of the following cases. Reinstating the revoked approval for moonlighting is depending upon the program director's discretion.
 - When it is determined that a GME Trainee's moonlighting activities negatively impact his/her ability to fulfill their clinical duties and patient care; or
 - When the GME Trainee is deemed unfit for clinical and/or non-clinical duties due to mental or physical impairment including injury, illness, and fatigue; or
 - When the program director or the program's Clinical Competency Committee issued a Letter of Deficiency to a GME Trainee: or
 - When the GME Trainee is suspended from his/her training program activities or clinical activities; or
 - When the GME Trainee is found to be non-compliant with the Medical Center and GME policies and regulations including, but not limited to, non-compliance with the mandatory NetLearning courses, flu-shot, TB-testing, and respiratory mask-fit deadlines; or
 - When the GME Trainee is found to be in Duty Hour violation.
8. Time spent by trainees in any moonlighting activity must be counted towards the 80 hour Maximum Weekly Duty Hour Limit. All moonlighting duty hours must be recorded in New Innovations as moonlighting duty hours in addition to the duty hours worked for the regular educational activities.
9. In consideration of duty hour restrictions, no GME Trainees assigned to inpatient service requiring in-house call shall engage in any moonlighting activity during that rotation.
10. Audits of moonlighting duty hours logged will be performed by the GMEO and the GME trainee's program director.
11. In view of the serious legal implications of GME Trainees engaging in unauthorized moonlighting activities, noncompliance with this policy may result in certain disciplinary or adverse actions, including dismissal from the residency or fellowship training program. Specific disciplinary or adverse actions will be determined by the program director, department chair, or DIO.

Revised/Approved, Graduate Medical Education Committee, December 17, 2003

Updated, Graduate Medical Education Committee, October 1, 2006

Updated, Graduate Medical Education Committee, May 2, 2007

Updated, Graduate Medical Education Committee, August 30, 2007

Updated, Graduate Medical Education Committee, March 19, 2008

Updated, Graduate Medical Education Committee, October 21, 2009

Updated, Graduate Medical Education Committee, February 17, 2010

Reviewed GMEC Policy Subcommittee: March 8, 2011

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