



GRADUATE MEDICAL EDUCATION COMMITTEE POLICY NO. 11

A. SUBJECT: Moonlighting Activities

B. EFFECTIVE DATE: September 20, 2023 (R)

C. REASONS FOR POLICY:

The University of Virginia Medical Center (UVAMC) strives to provide excellence, innovation and superlative quality in the care of patients, the training of health professionals, and the creation and sharing of health knowledge within a culture that promotes equity, diversity and inclusiveness. To promote these goals, the UVAMC is committed to a safe and supportive learning and working environment for all members of its community. This policy outlines the responsibilities for Graduate Medical Education (GME) programs and the steps to be taken to ensure well-being and quality of clinical experiences and education of GME Trainees (hereinafter "Trainees").

D. DEFINITION OF TERMS:

- **Internal moonlighting:** Voluntary, compensated, medically-related work (not related with training requirements) performed within the institution in which the Trainee is in training or at any of the approved participating sites.
- **External moonlighting:** Voluntary, compensated, medically-related work performed outside the institution where the Trainee is in training or at any of approved participating sites.

E. POLICY STATEMENT:

1. Moonlighting must not interfere with the ability of the Trainee or other Trainees to achieve the goals and objectives of the educational program, and must not interfere with the Trainee's fitness for duty nor compromise patient safety.
2. Time spent by Trainees in internal and external moonlighting must be counted toward the 80-hour maximum weekly limit.
3. No ACGME-accredited Trainees in PGY-1 year are permitted to moonlight.
4. Trainees on Visas are not permitted to moonlight per the U.S. Citizenship and Immigration Services regulations.
5. Programs and departments may have policies which are more restrictive than the institutional policy. Programs must not require Trainees to engage in moonlighting activities. Each department's policy regarding moonlighting activities must be well-publicized to its Trainees (e.g., handout materials; intranet).
6. Trainees seeking to moonlight must submit an application, requiring program director approval, to the GME Office. Applications will be referred to the DIO for review and

approval. Trainees shall not begin moonlighting prior to receiving DIO approval and any other required credentialing as described in the moonlighting application.

7. 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 Trainee to achieve the goals and objectives of the required educational program, and that the Trainee is in good standing in their training program.
8. Approval for moonlighting may be valid for an 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.
9. The program director has primary responsibility to monitor fatigue levels of all Trainees participating in all moonlighting activities. Additionally, faculty members and Trainees must be educated to recognize the signs of fatigue and sleep deprivation and in alertness management and fatigue mitigation processes.
10. Approval for moonlighting can be denied or revoked at any point by the program director or DIO in any of the following cases. Reinstating the revoked approval for moonlighting is at the program director's discretion.
 - a) When it is determined that Trainee's moonlighting activities negatively impact their ability to fulfill their clinical duties and patient care; or
 - b) When it is determined that Trainee's moonlighting activities negatively impact the learning and working environment for other trainees in the program; or
 - c) When the Trainee is deemed unfit for clinical and/or non-clinical duties due to mental or physical impairment including injury, illness, and fatigue; or
 - d) When the program director or the program's Clinical Competency Committee issued a Letter of Deficiency to a Trainee; or
 - e) When the Trainee is suspended from their training program activities or clinical activities; or when the Trainee is found to be non-compliant with the Medical Center or GME policies and regulations including, but not limited to, non-compliance with any HR or Employee Health requirements. ,
 - a) When the Trainee is found to be in Clinical and Educational Work Hours violation.
11. All moonlighting hours must be recorded in New Innovations as moonlighting hours in addition to the Clinical and Educational Work Hours for the regular educational activities.
12. In consideration of Clinical and Educational Work Hours restrictions, no Trainees assigned to inpatient service requiring in-house call shall engage in any moonlighting activity during that rotation.
13. Audits of moonlighting hours logged will be performed by the Trainee Work Hour Oversight Committee and the Trainee's program director.
14. In view of the serious legal implications of 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.

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Updated, Graduate Medical Education Committee, May 2, 2007
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Updated, Graduate Medical Education Committee, March 19, 2008
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Reviewed GMEC Policy Subcommittee: March 8, 2011
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