

IDENT	GME15
Type of Document	Policy
Applicability Type	Department-Level
Title of Owner	Dir GME
Title of Approving Official	GMEC
Date Effective	10/21/2021
Date of Next Review	10/21/2024



TITLE: Internal Moonlighting

POLICY: Voluntary, compensated, medically related work performed within the institution in which the resident/fellow is in training. Internal moonlighting may be permitted for UVM Medical Center residents/fellows who are PGY-2 or higher. PGY-1 residents and residents/fellows with Visas are prohibited from doing internal moonlighting.

PROCEDURE:

- Internal moonlighting is strictly voluntary.
- Residents/Fellows interested in participating in an internal moonlighting must:
 - Be in good standing within their program, and
 - Must work with their Program Director and the Department's Healthcare Service Director (HCS) to complete the Internal Moonlighting Request Form.
 - The HCS Director must approve the funding for internal moonlighting.
- All internal moonlighting activities must be reviewed and approved by the Graduate Medical Education Committee (GMEC) prior to being instituted.
- HCS Director must notify UVM Medical Center Payroll about supplemental pay for the resident's/fellow's internal moonlighting hours and the cost center funding this work time.
- Two tiers for internal moonlighting exist.
 - Tier 1
 - Opportunity for the resident/fellow to receive remuneration outside their normal working hours to provide patient care with attending supervision.
 - Since this work time requires attending supervision, a Vermont limited temporary license is sufficient.
 - The supervising attending bills for services. The resident/fellow cannot bill for services provided.
 - Tier 2
 - Opportunity for the resident/fellow to receive remuneration outside their normal working hours to provide patient care on services separate from their training program as independent medical practitioner.
 - UVM Medical Center Medical Staff Office must credential the resident/fellow prior to the start of internal moonlighting. This includes obtaining a valid Vermont medical license.
 - Resident/Fellow can bill for services provided.
 - Upon approval by the GMEC, the program director or HCS Director must provide the name of the resident/fellow doing internal moonlighting to the UVM Medical Center Compliance Officer and to the Professional Revenue Department (PRD).
 - The services performed when doing internal moonlighting must be separately identified from those services that are required as part of their GME training program. The work performed cannot be part of the resident's/fellow's curriculum or counted towards required minimums. It does, however, count toward total hours worked during the week.
- Moonlighting must not interfere with the ability of the resident/fellow to achieve the goals and objectives of the educational program. The program director must monitor resident's/fellow's training performance for any evidence of negative impact from participating in moonlighting activities. Adverse effects in resident/fellow performance will lead to withdrawal of permission.
- Time spent completing internal moonlighting activities counts toward the total hours worked during the week. No other duty hours requirements apply.

DEFINITIONS:

Internal moonlighting is voluntary, compensated, medically-related work external to the educational program that occurs at sites under the governance of UVM Medical Center.

REFERENCES: Accreditation Council for Graduate Medical Education, Institutional Requirements

Documents Status: **Approved**

REVIEWERS:

Mike Barewicz,	Director, Professional Revenue Department,
Jennifer Parks,	Chief Compliance and Privacy Officer,
GMEC	

OWNER: Karen Miller, Dir GME

APPROVING OFFICIAL: Melissa Davidson, MD, GMEC