

IDENT	GME15
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Title of Owner	Dir GME
Title of Approving Official	GMEC
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TITLE: Internal Moonlighting

POLICY: Internal moonlighting is voluntary, compensated, medically related work performed within the institution in which the resident/fellow is in training. Internal moonlighting may be permitted for the UVM Medical Center residents/fellows who are PGY-2 or higher.

PROCEDURE:

- Internal moonlighting is strictly voluntary.
- Any Resident/fellow interested in participating in internal moonlighting must:
 - Be in good standing within their program, and
 - Work with their Program Director and the Department’s Healthcare Service Director (HCS) to complete the Internal Moonlighting Request Form, which serves as written permission from the program director for the resident/fellows to internally moonlight.
 - The HCS Director must approve the funding for internal moonlighting.
- Any Resident/Fellow interested in participating in internal moonlighting while in J-1 visa status must also submit the Attestation for Supplemental Clinical Activity Within the Training Institution according to guidelines set by the Exchange Visitor Sponsorship Program (EVSP).
 - The EVSP request form must be submitted to the institution’s Training Program Liaison (TPL) prior to approval of the institution’s internal request form by GMEC.
- All internal moonlighting activities must be reviewed and approved by the Graduate Medical Education Committee (GMEC) prior to being instituted.
- The 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 is responsible for billing 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 an 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 full Vermont medical license. GME and training programs do not cover the cost of licensure for moonlighting.
 - 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 while internal moonlighting must be separately identified from those services required as part of their GME training program. The work performed cannot be part of the resident/fellow’s required curriculum or counted towards required minimums.
- Moonlighting must not interfere with the ability of the resident/fellow to achieve the goals and objectives of their residency/fellowship program. The program director must monitor the resident’s/fellow’s training performance for any evidence of negative impact from participating in moonlighting activities. Adverse effects in resident/fellow performance will result in withdrawal of permission.

Documents Status: **APPROVED**

- Time spent in 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
Exchange Visitor Sponsorship Program, Intealth dba ECFMG

REVIEWERS:

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

OWNER: Dir GME

APPROVING OFFICIAL: DIO, GMEC