

**USF Health - Morsani College of Medicine
GME POLICY & PROCEDURE**

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Scope: Applies to all University of South Florida Morsani College of Medicine (“USF MCOM”) Residents and fellows (“Residents”) in Accreditation Council for Graduate Medical Education (“ACGME”) accredited and non-accredited/non-standard programs as appointed through the House Officer Contract issued by the USF MCOM Graduate Medical Education Office (“GME Office”).

Background: This policy is for the review of moonlighting and all outside activities (“moonlighting/OA”), which may include internal and external moonlighting or additional non-clinical work outside of their training program. The USF MCOM is committed to establishing protocols and standards to ensure the well-being of the Resident who trains at USF MCOM and its affiliated hospital, by ensuring that these trainees maintain a safe working environment and get adequate rest from their clinical duties. Residency training is a full-time educational experience, and the special nature of residency training requires extensive clinical activity and availability to patients at times other than the regular workday. Extramural paid activities must not interfere with the Resident's educational performance, clinical responsibilities and/or rest periods.

Policy: The USF MCOM is committed to providing the highest quality work environment for physicians in training to master their chosen disciplines. Residents appointed to a program are expected to achieve the goals and objectives of the educational program. Any professional, patient care or medical practice activities performed by Residents outside of the educational program must not interfere with the Resident's achievement of the goals and objectives of the educational program or adversely affect patient safety. In accordance with the ACGME requirements, Residents must not be required to engage in moonlighting/OA [IR IV.K.1.] and all internal and external moonlighting/OA must be counted towards the 80-hour maximum weekly hour [CPR VI.F.1.] ; Residents must have an approved moonlighting form for each academic year from their program director to moonlight; the ACGME-accredited program(s) will monitor the effect of moonlighting activities on a Resident's performance in the program, including that adverse effects may lead to withdrawal of permission to moonlight; and, the Sponsoring Institution or individual program(s) may prohibit moonlighting by Residents. Oversight of work hours is the responsibility of the program, the Graduate Medical Education Committee (“GMEC”) and the GME Office. Program director should verify that moonlighting hours were logged in the previous academic year prior to allowing for a continuation of moonlighting privileges.

In a limited number of circumstances and consistent with the provisions set forth below, Residents may engage in moonlighting/OA during their period of appointment with annual approval from their program, GME Office and the USF eDisclose system. The eDisclose system enables employees to meet their annual Florida Code of Ethics for Public Officers and Employees (FCOE) disclosure and acknowledgement responsibilities; likewise, eDisclose enables supervisors,

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managers, and senior managers to meet their review responsibilities for employee disclosures of nepotism and outside activity. As an integral part of the moonlighting review/approval process, the Resident must log into my.usf.edu and complete the eDisclose for Outside Activity (“OA”) Process.

Provisions for Moonlighting/QA:

1. Residents seeking approval to moonlight and who engage in moonlighting/OA must be individually and fully licensed for the unsupervised medical practice in the state where the moonlighting occurs.
2. PRG-1 Residents are not permitted to moonlight or engage in OA.
3. Residents holding a J-1 Visa are expressly prohibited from moonlighting/OA under federal regulations.
4. Residents holding an O-1 Visa may only engage in moonlighting/OA if the Residents visa specifically grants permission for these purposes.
5. Residents must complete and sign a “Moonlighting Privileges Request Form” each new academic year. The Program Director and Designated Institution Official (“DIO”), or GME Director, must review, approve, and sign the form before the Resident begins moonlighting/OA. A copy of the form will be placed in the Resident's program file.
6. Residents must be in good standing as defined by the Program Director and the program's Clinical Competency Committee with regards to performance in all ACGME competencies and compliance with all institution's and program's policies.
7. The Program Director will monitor the effect of moonlighting/OA activities on a Resident’s performance in the program. Adverse effects may lead to withdrawal of permission to moonlight.
8. Residents who have received written warning, probation, suspension, or extension of training are prohibited from engaging in any moonlighting/OA during the period of remediation.
9. A Program Director or DIO has the discretion to permit, prohibit, limit, or revoke permission for moonlighting/OA as they deem appropriate. The Program Director and DIO's decision concerning this approval/non-approval is not subject to appeal.
10. Any approval by a Program Director and DIO allowing a Resident to moonlight is valid for the academic year in which it is granted, unless limited or revoked sooner. Approval of moonlighting/OA requires that all hours worked in such employment combined with all USF training hours be in compliance with the 80-hour work week limitations set forth by the ACGME, regardless of the accreditation status of the program. The Resident is responsible for reporting and logging all hours worked, including all internal and external moonlighting/OA hours, on a bi-weekly basis. Residents who are moonlighting and have been found to be in violation of the ACGME 80-hour rules or fail to report any hours worked, whether regular work hours or internal or external work hours, will be deemed to have voluntarily relinquished their moonlighting/OA approval.
11. Regardless of the total number of hours worked, recurring episodes of excessive fatigue, interference with the Resident's achievement of the goals and objectives of the educational program, or any adverse effect on patient

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safety shall trigger reevaluation of the approval to accept supplementary employment and may result in the rescission of approval for moonlighting/OA activities.

12. Residents may not engage in moonlighting/OA during regular work hours or while on call. Residents may not accept outside employment or engage in other outside activity that may interfere with the full and faithful performance of their clinical duties.
13. Residents are not allowed to participate in moonlighting/OA or do locum tenens activity during an approved leave of absence to include Medical/Parental/Caregiver leave.
14. USF does not cover the malpractice or professional liability of the trainee for any activity related to moonlighting/OA outside of the official training program, unless the moonlighting is done for a USF Health division or department. Any professional liability (malpractice) insurance for moonlighting/OA outside of USF is the sole responsibility of the Resident. Residents must either purchase sufficient malpractice insurance to cover his/her moonlighting/OA activities or obtain written assurance from the hiring institution or entity that it will provide malpractice insurance and workers' compensation coverage.
15. Use of an affiliate hospitals DEA number is not valid for activities outside the scope of the residency training program.
16. It is the responsibility of the institution or entity hiring a Resident for moonlighting/OA activity to confirm whether the Resident is individually and fully licensed for the unsupervised medical practice in the state where the moonlighting/OA occurs and that the Resident has obtained adequate liability coverage for professional or medical malpractice and has the proper work authorization to be able to legally work as per federal law.
17. Program Directors should review the Resident's moonlighting/OA scope of practice with the Resident. Program Directors should only allow a moonlighting/OA scope of practice that applies to the trainee's past/current level of training not their expected level at the end of training program. In addition, Program Directors should verify any additional limitations set forth by the specialty ACGME RRC and comply with these limitations.
18. Violation of this moonlighting policy may include disciplinary action up to and including dismissal.

Procedure

Responsible Party

Resident

Action

Requests written approval each academic year for any moonlighting/OA via the GME Moonlighting Privileges Request Form. Has a full Florida license and ensures adequate professional (medical) malpractice liability coverage for such activities. Completes the USF eDisclose form through my.usf.edu.

Complete the eDisclose for Outside Activity ("OA") Process, which includes:

Step 1: Employee creates new disclosure and submits.

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Step 2: Supervisor reviews and makes a recommendation to the next reviewer.

Step 3: Manager reviews and makes a recommendation to the next reviewer.

Step 4: Senior Manager reviews and makes a determination.

Step 5: Employee Acknowledges the review determination.

If moonlighting/OA will occur at an affiliate site, additional documentation of moonlighting hours may be required. If not completed in a timely fashion, moonlighting/OA privileges may be rescinded. In addition, if employed with USF Health as a moonlighter, must work with department to ensure additional compliance standards are met.

Notifies program, Program Director and GME Office when moonlighting activity is terminated.

Accurately logs all internal and external moonlighting hours in New Innovation.

Program Director

Notifies Resident of approval or denial of moonlighting request and documents in writing that decision in the Resident file.

Ensure moonlighting will not interfere with residency training and that moonlighting, once approved, is counted in the total weekly work hour limits for patient care activity as set forth by the ACGME.

Monitors Resident for any stress and fatigue or any other interference moonlighting/OA has on training.

Makes decisions on initial approval, renewal, and cessation of approval based on the Resident's ability to meet duty hour requirements and the Resident's achievement of the goals and objectives of the educational program or patient safety.

Verifies moonlighting hours were logged in the previous academic year prior to allowing renewal of their moonlighting privileges.

GME Office

Permits, prohibits, limits, or revokes permission to moonlight.

APPROVED:



Senior Associate Dean, Graduate Medical Education/DIO

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Date of Origin	Effective	Revision/GMEC Approval:	Originally Policy #
8/2002	4/2024	6/2005; 8/2008; 2011; 6/2014; 10/2015; 6/2017; 8/2019; 12/2022; 10/2023; 4/2024	GME-208-B