

IDENT	GME15
Type of Document	Policy
Applicability Type	Department-Level
Title of Owner	Dir GME
Title of Approving Official	GMEC
Date Effective	9/18/2018
Date of Next Review	9/18/2021



**TITLE:** Internal Moonlighting

**POLICY:** Voluntary, compensated, medically-related work (not related with training requirements) 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 are prohibited from doing internal moonlighting.

**PROCEDURE:**

- Internal moonlighting is strictly voluntary.
- Residents/Fellows interested in participating in an internal moonlighting opportunity must:
  - Be in good standing within their program, and
  - Obtain a written statement of permission from their program director. This statement must be kept in the resident's/fellow's file in New Innovations.
- All internal moonlighting activities must be reviewed and approved by the Graduate Medical Education Committee (GMEC) prior to being instituted.
- Upon approval by the GMEC, the program director must provide the names of any residents/fellows doing internal moonlighting to the UVM Medical Center Compliance Officer and to the Professional Revenue Department (PRD). Internal moonlighting may not begin until PRD has implemented appropriate billing edits so that internal moonlighting services are not billed to any payer that provides GME funding. Per Medicare rules, professional billing for internal moonlighting is only permitted in the Emergency Department and outpatient clinics for billable services. Medicare will not reimburse UVM Medical Center for residents/fellows who do internal moonlighting in the inpatient setting. Therefore, internal moonlighting in the inpatient setting will not generate claims to Medicare or Medicaid, or any other payer that funds GME.
- The services performed when moonlighting must be separately identified from those services that are required as part of the approved GME program. The work performed cannot be part of the residents/fellows curriculum or counted towards required minimums. It does, however, count toward total hours worked during the week
- After obtaining approval from the GMEC and prior to participating in internal moonlighting activities, residents/fellows must:
  - Obtain a valid Vermont State Medical License; a temporary license does not suffice
    - Only exceptions are Radiology residents moonlighting on MRI service and Pediatric residents doing NICU transports who remain under attending physician supervision.
  - Obtain a certificate of malpractice insurance. UVM Medical Center malpractice insurance will cover residents for internal moonlighting.
- 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.
- Residents/Fellows must log all time spent doing internal moonlighting activities in New Innovations as "internal moonlighting".
  - 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.

Documents Status: **Approved**

**REFERENCES:** Accreditation Council for Graduate Medical Education, Institutional Requirements

**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