

Effective: 07/01/2022; Revised: 4/14/2023; 5/17/2024

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EXTRACURRICULAR PROFESSIONAL ACTIVITY (MOONLIGHTING)

VUMC affirms that the primary responsibilities of members of the House Staff are to their own postgraduate medical education and to the patients charged to their care. Extramural professional activities that are not a required part of training, not part of a redistribution situation to meet patient needs under unpredictable and exigent circumstances (e.g. pandemic or other crisis requiring cross-coverage between programs), and for which the House Staff is receiving additional pay, are defined as “moonlighting.”

Moonlighting may not conflict with program responsibilities.

Moonlighting is prohibited Monday through Friday from 8:00 am until 5:00 pm. Any exceptions must be approved in writing by the VUMC DIO. Moonlighting during periods of authorized vacation time can occur, provided that proper documented approval of moonlighting activity has been obtained.

House Staff may not moonlight on rotations or services to which they are currently assigned as part of their residency or fellowship program. House Staff also may not moonlight while on call or otherwise responsible for patients under their regular duty. Questions regarding whether a particular request for moonlighting would be prohibited under this section should be directed to the ACGME DIO.

VUMC or any individual department or division also reserves the right to deny any specific moonlighting activity that is deemed inconsistent with VUMC policy regarding conflict of interest or other relevant policies. House Staff requesting moonlighting permission must be in good standing (i.e. not currently on any step of Corrective Action) and acknowledge that his or her performance will be monitored for the effect of the activity on their performance, and adverse impact or a change in standing may lead to revocation of permission. If privileges to moonlight are revoked, House Staff are required to reapply for moonlighting privileges through the mechanisms used for gaining initial approval.

All hours spent in moonlighting are subject to the Institutional Policy on Duty Hours and must be tracked through New Innovations. Failure to track moonlighting time, both internal and external, as duty hours may result in Corrective Action and revocation of moonlighting privileges.

Individual departments or divisions may impose additional restrictions on moonlighting activity. In addition, House Staff with a secondary faculty appointment must comply with the requirements of the VMG Bylaws and their VMG participation agreement.

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Violation of the Moonlighting Policy, including non-compliance with any requirements listed below, constitutes a breach of the House Staff Agreement between VUMC and the individual and may lead to corrective action up to and including Immediate Dismissal. Violation of the Moonlighting Policy also may result in revocation of moonlighting privileges. Contact the Office of GME for any clarification of these requirements.

All MOONLIGHTING – General Requirements:

1. Be in “good standing” in the training program (i.e., not on Corrective Action), and be PGY-2 or above.
2. Moonlighting cannot be used to fulfill a training requirement of the current training program.
3. Possess an unrestricted license to practice medicine in the state of Tennessee (or the appropriate state if moonlighting out of state).
4. All requests for moonlighting must be submitted to the GME Office for review and final approval. No moonlighting is permitted until this approval has been given. Moonlighting without this approval may result in Corrective Action. House Staff should consider this provision, and all requirements for moonlighting, before entering into any external moonlighting agreement.
5. Approval to moonlight remains in effect from the date of approval until either the current program is completed or the date of the expiration of the House Staff member’s independent Tennessee license, or unless otherwise restricted by the VMG.
6. If House Staff change programs, they must reapply for Moonlighting privileges. All moonlighting hours, both internal and external, must be recorded as duty hours.
7. J-1 Visa sponsorship and full military support prohibit moonlighting. Restrictions may apply for other visa types or contractual arrangements. House Staff members are responsible for understanding, advising the GME Office, and complying with any external restrictions on moonlighting activity related to their immigration status or other sponsoring organization.
8. PGY-1 House Staff may not moonlight.

INTERNAL MOONLIGHTING – Definition and Additional Requirements:

Internal moonlighting is defined as an activity that is outside the scope of the individual’s residency or fellowship program but is provided at a VUMC facility or provided at a facility with which VMG has an existing contract.

Work performed in violation of the Moonlighting Policy may not be separately compensated and may be considered as work done as part of the normal training program.

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Under the internal moonlighting policy, there are both general guidelines (listed above under General Requirements for All Moonlighting) and group specific guidelines. House Staff are divided into two groups, Group 1 and Group 2. These groups are as defined below and the requirements for each group are as follows:

GROUP ONE:

Defined as House Staff in an advanced or second residency program (i.e., board eligible/certified in another specialty) who wish to have a secondary faculty appointment in order to be credentialed in their primary specialty.

These House Staff may practice the specialty for which they are board certified/eligible.

Additional Requirements for Group One:

In order to qualify for internal moonlighting as a Group One physician, the House Staff must fulfill all of the following prerequisites:

1. Successful completion of an ACGME Training Program;
2. Board eligible/certified in a specialty for which they are moonlighting;
3. The House Staff must have a part-time Vanderbilt School of Medicine faculty appointment in the hiring department/division and obtain appointment to the Medical Staff through the usual credentialing process. However, the primary appointment will remain through GME.
4. Professional Liability coverage will be provided through the VUMC Self Insurance Trust. The additional cost will be prorated to the hiring department.
5. Within a department and/or division, internal moonlighting opportunities should be made known to all qualified House Staff at any specific level of training. **However, the House Staff should not be or feel pressured to participate in moonlighting activities.**

GROUP TWO:

Defined as House Staff who are not board certified/eligible.

These House Staff may **not** bill for their professional services.

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Additional Requirements for Group Two:

In order to qualify for internal moonlighting as a Group Two physician, the House Staff must fulfill all of the following prerequisites:

1. Professional Liability coverage will be provided through the VUMC Self Insurance Trust.
2. Within a department and/or division, internal moonlighting opportunities should be made known to all qualified House Staff at any specific level of training. **However, the House Staff should not be or feel pressured to participate in moonlighting activities.**
3. There must be an identified supervising attending physician.
4. If the service is to be billed by the attending, the House Staff must be supervised, and work documented, under CMS guidelines. All attending billing must comply with Medicare requirements.

EXTERNAL MOONLIGHTING – Definition and Additional Requirements:

External moonlighting is any extracurricular clinical employment outside of VUMC. House Staff may not represent themselves as having completed training or holding certification in the field in which they are training at VUMC.

External moonlighting must be reviewed for conflict of interest with the Chair of the Department or their designee, in addition to requiring approval by the DIO. If the Chair or designee feels that an irreconcilable conflict exists, the House Staff will not be able to moonlight.

Those under the job title of Clinical Fellow/Instructor may not externally moonlight. Clinical Fellows who also have opted to obtain a secondary faculty appointment for a purpose such as internal moonlighting and have signed a VMG participation agreement, must obtain approval of VMG prior to externally moonlighting.

Professional liability coverage is the responsibility of the individual House Staff. VUMC Self-Insurance Trust does not provide professional liability coverage for this external moonlighting.

Revisions Reviewed and Approved by GMEC: 05/17/2024