Vanderbilt Med-Peds Moonlighting Policy
(Updated September 28, 2018)

The Vanderbilt Med-Peds Program’s Moonlighting policy follows the Vanderbilt University Medical Center’s Housestaff Manual; AND also complies with the policies and procedures of each of its parent departments, the departments of internal medicine and pediatrics. Residents in the combined med-peds program must follow the policies and procedures of the parent program when they are rotating with that department.

The following is taken from the Vanderbilt University Housestaff Manual 2018-19, Section E: Extracurricular Professional Activity (Moonlighting)

E. 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. In as much as extramural professional activities, or “moonlighting,” may conflict with these responsibilities, VUMC generally discourages such activities.

In some departments, outreach programs at other medical facilities are approved activities, are a part of the established educational program, and are not considered moonlighting. Moonlighting is prohibited during regular VUMC duty hours, as defined by the Program Director and/or Chair of the house staff member’s Department. Moonlighting during periods of authorized vacation time can occur provided that proper documented approval of moonlighting activity has been obtained.

Individuals may not moonlight on rotations or services to which they are currently assigned as part of their residency or fellowship program. Questions regarding whether a particular request for moonlighting would be prohibited under this section should be directed to the ACGME Designated Institutional Official.

The Medical Center 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. The individual requesting moonlighting permission must be in good standing and acknowledges that his or her performance will be monitored for the effect of the activity on their performance, and adverse effects may lead to revocation of permission. In addition, any individual who fails to maintain good standing in their program for any reason will have their moonlighting privileges revoked effective immediately. Affected 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 the respective program’s duty hour tracking mechanisms. 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.

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

General Requirements for ALL Moonlighting:

1) Be in “good standing” in the training program (i.e., not on Corrective Action).

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.

5) Approval to moonlight remains in effect from the date of approval until June 30th of that academic year (July-June), unless the approval has been revoked for one of the reasons stated above. To moonlight in the following academic year (i.e., July 1st or later), the house officer must reapply for moonlighting privileges.

6) All moonlighting hours, both internal and external, must be recorded as duty hours.

7) J-1 Visa sponsorship and 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.

Definition and Additional Requirements for External Moonlighting:
External moonlighting is any extracurricular clinical employment outside of VUMC (VUH, VCH, PHV or the Vanderbilt Clinics).
Professional liability coverage is the responsibility of the individual resident. VUMC Self-Insurance Trust does not provide professional liability coverage for this external moonlighting.

Definition and Additional Requirements for Internal Moonlighting:
Practicing medicine for pay at VUMC outside the requirements of the training program is considered internal moonlighting. Work performed in violation of the Moonlighting Policy will not be separately compensated and will be considered as work done as part of the normal training program.

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:** House staff in an advanced or second residency program (i.e., board eligible/certified in another specialty) who wish to bill through the VMG for their professional services.

These individuals may practice the specialty for which they are board certified/eligible in an outpatient setting or an emergency department only. These individuals may bill third party payers for their professional services in accordance with the VMG and Medical Staff Bylaws. NOTE: Moonlighting is prohibited during regular VUMC duty hours, as defined by the Program Director and/or Chair of the house staff member’s host Department.

**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 individual 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 either “resident or clinical fellow.”

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:** House staff who are not board certified/eligible and/or are not billing for their professional services.

These individuals may not bill for their professional services. **NOTE:** Moonlighting is prohibited during regular VUMC duty hours, as defined by the Program Director and/or Chair of the house staff member’s host Department.

**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. The additional cost will be prorated to the hiring department.

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. This individual cannot bill for their services. If the service is to be billed by the attending, the house officer must be supervised, and work documented, under CMS guidelines. All attending billing must comply with Medicare requirements.

4. There must be an identified supervising attending physician.

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*Below are the specific Vanderbilt departmental policies relating to moonlighting while a resident rotating within each parent department:*

**Vanderbilt Department of Pediatrics Moonlighting Policy:**
No moonlighting of any kind is allowed for pediatric residents.

**Vanderbilt Department of Internal Medicine Moonlighting Policy:**
[https://medicine.mc.vanderbilt.edu/moonlighting-policy](https://medicine.mc.vanderbilt.edu/moonlighting-policy)
On July 1, 2011, the changes in the Accreditation Council for Graduate Medical Education (ACGME) work hour rules go into effect. The ACGME has called for increased supervision of physicians-in-training, tighter limits on moonlighting, and reduced work hours for first-year residents. It is the expectation that duty hours will continue to be limited to 80 hours per week, averaged over a four week period, and inclusive of all in-house call activities and all moonlighting. Individual programs are now responsible to monitor all moonlighting to ensure that duty hours are appropriately maintained. The stated goal is to reduce medical errors, ensure patient safety and improve quality of care.

Moonlighting is considered by the Department of Medicine to be an optional activity which, if approved for a given resident or fellow, must be contained within the 80 hour work week, fully documented, and void of any distraction from the academic and service components of our housestaff and fellowship programs. To be eligible for moonlighting, the applicant must:

- Be PGY 2 or higher.

- Residents are only permitted to moonlight within our own institution so that we may keep track of their total number work hours (both on rotation and moonlighting). In addition, residents are only permitted to moonlight if they are performing well within their assigned rotations.

- Beginning July 2012, scored at the 50th %tile or higher on their previous year's In-Training Exam.

- Be limited to two shifts per week (non-consecutive days) when serving on a non-inpatient rotation. (Moonlighting is not permitted when serving on an inpatient rotation.)

- Be approved with a written statement from the Program Director or Associate Program Director that is made part of the resident's file. (The residents' performance will be monitored for the effect of Moonlighting activities upon performance and adverse effects may lead to withdrawal of permission.)

- Have demonstrated no concerns with variation from implied or explicit moonlighting policy.

- Be independently licensed to practice in the State of Tennessee and, where applicable, have adequate malpractice coverage.

- All requests for moonlighting must be approved by the DIO/Associate Dean for GME. No moonlighting is permitted until this approval has been given. Moonlighting without this approval may result in Corrective Action.”
While any moonlighting must be monitored for compliance with the aforementioned concerns, external moonlighting will come under closer scrutiny going forward. Accordingly, the Department of Medicine has determined to require periodic validation of external moonlighting hours, i.e., a retrospective audit. Details will follow, but at a minimum, individuals, groups, or institutions with whom you contract for services may be required to provide documentation of hours you have worked within a specified time frame.

Believing that interest in moonlighting will continue or increase, the medical center has agreed to provide an increased opportunity for internal moonlighting. For example a second shift will be added to the Scoville Service - details to follow. Additional moonlighting shifts are under consideration at the Veterans Administration Hospital.

To be eligible for external moonlighting, in addition to the general moonlighting rules, the applicant must:

- Be a Fellow at the PGY 4 level or higher
- (Beginning July 2011) Contract with entities which are willing and able to provide meaningful information regarding hours spent in moonlighting activity.

**Vanderbilt Med-Peds Program Moonlighting Policy**

The Vanderbilt Med-Peds residents must comply with the Vanderbilt University Medical Center’s Policy outlined above. In addition, they must follow the policies of the parent program in which they are currently rotating when deciding if moonlighting is permissible at that time.

When rotating on Pediatrics, no moonlighting is allowed to be consistent with their pediatric program peers. Moonlighting within the department of medicine is not allowed while a med-peds resident is rotating on pediatrics.

When rotating on Internal Medicine, residents must follow the medicine program requirements above for internal moonlighting only.