

UCSF Pulmonary & Critical Care Medicine Fellowship Training Program Policy on Moonlighting

In accordance with the University of California San Francisco (UCSF) Graduate Medical Education (GME) Moonlighting Policy, and with input from the Faculty and Fellows, the Program Director and Associate Program Director of the UCSF Pulmonary & Critical Care Medicine Training Program have developed this Moonlighting Policy.

General Considerations: The UCSF Pulmonary & Critical Care Medicine Training Program will allow ACGME Fellows to participate in both Internal and External Moonlighting as described within. Moonlighting is considered a privilege, not an entitlement or a requirement. Under no conditions will Fellows of the PCCM be required to engage in Moonlighting.

Typically, first-year fellows DO NOT participate in either internal or external moonlighting, unless it is during vacation time. As stated below, moonlighting also counts explicitly toward the 80-hour-work-week requirement. If a first-year fellow has exceptional circumstances that require moonlighting, he/she should discuss with the Program Director in advance to discuss the situation.

The exceptions to this policy are that the Department of Medicine requires that fellows provide coverage to Internal Medicine residents twice a year on a voluntary basis: in December for the Departmental Holiday Party and in May for the End-of-the-Year Party. These opportunities are available for internal moonlighting, including by first-year fellows. Fellows who were former UCSF residents are particularly encouraged to moonlight in these roles due to familiarity with the system and due to a “pay-it-forward” culture of gratitude within the Internal Medicine residency program.

Second-year and third-year fellows are permitted to do Internal and External Moonlighting, with the caveats and requirements listed below.

Internal Moonlighting is defined as extra work for extra pay performed at any UCSF, San Francisco Veterans Affairs Medical Center, or Zuckerberg San Francisco General Hospital and Trauma Center site, as well as any other site that participates in the Clinical Fellows’ training program. This activity must be supervised by faculty and is not to exceed the level of clinical activity and responsibility currently approved for the participating trainee in his/her training program. While performing Internal Moonlighting services, trainees are not to perform as independent practitioners. All Internal Moonlighting hours must be documented and must comply with the written policies of the ACGME, UCSF GME, and the Program regarding clinical and educational work hours.

External Moonlighting is defined as work for pay performed at a non-UCSF site or a site that does not participate in the Fellow's training program. External moonlighting hours must be documented and must comply with the written policies of the ACGME, UCSF GME, and the Program regarding clinical and educational work hours. For External Moonlighting, the trainee is not covered under the University of California's professional liability insurance program as the activity is outside the scope of University employment. The trainee is responsible for ensuring liability coverage from another source, DEA licensure, Medicare (or other governmental) provider number and billing training, and licensure requirements by the California Medical Board as well as any other requirement for clinical privileging at the employment site.

Permission: It is the responsibility of the requesting Fellow to obtain written permission to moonlight from the Program Director prior to beginning any Internal or External Moonlighting activity. Approval template forms for both Internal and External Moonlighting are available from the Program Director's office. Any trainee moonlighting without permission will be subject to the following actions. Through direct contact with the Program Director, the Fellow will be reminded of these policies and directed to obtain the necessary permission prior to continuation of moonlighting activities. Further moonlighting without permission will result in review by the Fellowship Committee for possible withdrawal of that trainee's moonlighting privileges. Restitution of moonlighting privileges will be subject to the discretion of same.

Documentation: Time spent by Fellows moonlighting, both Internal and External, must be counted towards the 80-hour maximum weekly limit and must comply with the written policies regarding clinical and educational work hours as per the Pulmonary & Critical Care Medicine Training Program, UCSF and ACGME. Both Internal and External Moonlighting must be documented and submitted. It is the responsibility of the moonlighting Fellow to document the days, hours, location, and brief description of type of service(s) that they have provided and submit these by the beginning of each month to the Program Director. Failure to submit the Monthly Moonlighting Documentation Form will result in the suspension of that trainee's moonlighting privileges pending completion of their documentation.

Monitoring and Periodic Review: Because Fellowship Training is a full-time endeavor, ACGME Fellows must ensure that moonlighting does not interfere with their ability to achieve the goals and objectives of their educational program. Trainees are responsible for ensuring that moonlighting and other outside activity does not result in fatigue that might affect patient care or learning. Each month, in combination with documentation of moonlighting hours, each trainee will be asked to review his or her own performance with respect to fatigue. Additionally, the Fellowship Clinical Competency Committee and the Fellowship Coaches provide regular and periodic performance reviews of every Fellow, regardless of participation in moonlighting. Through this and other already established

mechanisms, the Program Director will monitor Fellow performance, patient care, learning and trainee fatigue. If the Program Director determines that the trainee's performance does not meet expectations, permission to moonlight will be withdrawn. The restitution of moonlighting privileges will be considered at the request of the Fellow by the Program Director and/or the Fellowship Committee. The UCSF Graduate Medical Education Committee periodically reviews reports by Program Directors regarding moonlighting activity.

Revised December 11, 2018

Approved by Pulmonary & Critical Care PEC XX, XX, 2018

Approved by GMEC XX, XX, 2018