

**University of Chicago Medical Center  
Graduate Medical Education Policy**

**Extra Service Pay Activity for Residents and Fellows  
Including Moonlighting**

Policy Name: Extra Service Pay/Moonlighting  
Policy Number: GME 07  
Issued: February 2001  
Revised: October 2008  
July 2011  
January 2017  
May 2017

**Purpose**

The University of Chicago Medical Center (“UCMC”) is committed to meaningful and enriching educational experiences for its trainees in graduate medical education programs. Because residency and fellowship training is a full-time educational experience, extramural paid activities including, without limitation, moonlighting must not interfere with a resident's or fellow's educational performance or ability to achieve the goals and objectives of his or her graduate medical education program.

The purpose of this policy is to ensure that any extramural paid activities for residents and fellows in UCMC graduate medical education programs meet the Accreditation Council for Graduate Medical Education's (“ACGME”) requirements, as well as any state and federal laws and regulations, as applicable. Residents and fellows are not required to engage in moonlighting as a condition for appointment to a UCMC graduate medical education program.

**Definitions and Requirements -**

**Approved Training Program** (or “Program”) means a UCMC residency or fellowship program approved by the ACGME, by the American Osteopathic Association, by the Commission on Dental Accreditation of the American Dental Association, by the Council on Podiatric Medical Education of the American Podiatric Medical Association, or by the American Board of Medical Specialties.

**Extra Service Pay** refers to educational activity not considered a required experience in the curriculum of the Approved Training Program. Program Directors may set up Non-Required Elective Rotations with compensation as part of their Approved Training Programs (within UCMC or entities under corporate ownership of UCMC).

The following elements are applicable to Extra Service Pay:

1. Prior written permission by the Program Director is required.
2. Professional activity is performed under supervision of an attending physician.
3. Educational activity is performed in facilities and settings under corporate ownership of UCMC.

4. Compliance with ACGME duty hour standards must occur.
5. Residents/fellows may not be compelled or required to participate in activities for Extra Service Pay.
6. The Program must monitor the effect of Extra Service Pay on overall performance. Adverse effects may lead to withdrawal of permission.
7. Institutional leadership reserves the right to independently monitor the effects of participation in Extra Service Pay activities on performance. When appropriate, UCMC's Designated Institutional Official ("DIO") may notify the Program Director that participation in Extra Service Pay activities must be curtailed or eliminated.
8. PGY-1s are not eligible for Non-Required Elective Rotations with Extra Service Pay.
9. Payment is processed through UCMC payroll.

**Internal Moonlighting** is defined as voluntary, compensated medically-related work not related to the Approved Training Program requirements performed within the institution in which the resident is training (UCMC) or at any of its related participating sites. The following elements are applicable to Internal Moonlighting:

1. Prior written permission by the Program Director is required.
2. Professional activity is performed without direct supervision within facilities under corporate ownership of UCMC.
3. Compliance with ACGME duty hour standards must occur.
4. An appointment to the UCMC medical staff is required.
5. An unrestricted Illinois medical license is required. Residents and Fellows are not allowed to moonlight under a training license.
6. Residents/fellows may not be compelled or required to engage in Internal Moonlighting.
7. The Program must monitor the effect of Internal Moonlighting on overall performance. Adverse effects may lead to withdrawal of permission.
8. Institutional leadership reserves the right to independently monitor the effects of Internal Moonlighting on performance. When appropriate, the DIO may notify the Program Director that participation in Internal Moonlighting must be curtailed or eliminated.
9. PGY-1s are not eligible for Internal Moonlighting.
10. Residents and fellows who engage in and intend to bill for moonlighting must comply with UCMC's applicable policies for billing for physician services.
11. Payment is processed through UCMC payroll.

**External Moonlighting** is defined as voluntary, compensated medically-related work not related with the Approved Training Program requirements performed outside of UCMC. The following elements are applicable to external moonlighting:

1. Prior written permission by the Program Director is required.
2. Professional activity is performed without direct supervision within facilities not under corporate ownership of UCMC unless expressly stipulated pursuant to a contractual relationship between UCMC and the facility in which external moonlighting will occur.
3. Compliance with ACGME duty hour standards must occur.

4. An unrestricted Illinois medical license is required. Residents and Fellows are not allowed to moonlight under a training license.
5. Professional liability insurance is not provided by UCMC. Additionally, UCMC assumes no responsibility for professional activities performed by residents/fellows engaged in External Moonlighting.
6. Residents/fellows may not be compelled or required to engage in External Moonlighting.
7. The Program must monitor the effect of External Moonlighting on overall performance. Adverse effects may lead to withdrawal of permission.
8. Institutional leadership reserves the right to independently monitor the effects of participation in External Moonlighting on performance. When appropriate, the DIO may notify the Program Director that participation in External Moonlighting activities must be curtailed or eliminated.
9. PGY-1s are not eligible to participate in External Moonlighting.
10. Residents and fellows who engage in and intend to bill for moonlighting must comply with UCMC's applicable policies for billing for physician services.
11. Payment is not processed through UCMC payroll.

**Restrictions:**

A resident or fellow with either a temporary Illinois license or a J-1 visa is not permitted to moonlight, either internally or externally. A resident or fellow with an H1-B visa may be eligible for Extra Service Pay and/or Internal Moonlighting activities under certain circumstances. All Extra Service Pay activities engaged in by such a resident or fellow must fall within the scope of the Approved Training Program of which the resident or fellow is a part.

**Interpretation, Implementation and Revision:**

The Office of Graduate Medical Education and the Office of Legal Affairs are responsible for the revision of this policy.

The Chief Compliance Officer and the Office of Legal Affairs are responsible for resolving billing issues concerning residents and fellows.

The Graduate Medical Education Committee is responsible for the interpretation and implementation of this policy.

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Kenneth Polonsky, M.D.

Richard T. Crane Distinguished Service Professor, Dean of the Division of the Biological Sciences and the Pritzker School of Medicine and Executive Vice President for Medical Affairs

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Michael A. Simon, MD

Associate Dean for Graduate Medical Education  
Chair of the Graduate Medical Education Committee

	<b>Extra Service Pay</b>	<b>Internal Moonlighting</b>	<b>External Moonlighting</b>
<b>Payment Processing</b>	UCMC payroll	UCMC payroll	Not UCMC or via UCMC payroll
<b>Activity</b>	<b>Within Scope of Program Activities and Rotations- eg- existing rotation based at UCM</b>	<b>Not Within Scope of Program Activities and Rotations</b>	<b>Not Within Scope of Program Activities and Rotations</b>
<b>Location</b>	<b>Must occur at UCMC or a clinic under the control of the UCMC Board of Directors</b>	<b>Occurs at UCMC or a clinic under the control of the UCMC Board of Directors</b>  <b>Unless specified in a master affiliation agreement</b>	<b>Not at UCMC</b>
<b>Direct Supervision Required?</b>	<b>YES</b>	<b>NO</b>	<b>NO</b>
<b>Prior approval by PD Required and Documented?</b>	<b>YES</b>	<b>YES</b>	<b>YES</b>
<b>Academic appointment?</b>	<b>NO</b>	<b>YES</b>	<b>COULD BE REQUIRED BY EXTERNAL SITE</b>
<b>Credentialing packet?</b>	<b>NO</b>	<b>YES</b>	<b>COULD BE REQUIRED BY EXTERNAL SITE</b>
<b>Moonlighting contract?</b>	<b>NO</b>	<b>YES</b>	<b>COULD BE REQUIRED BY EXTERNAL SITE</b>
<b>UCMC Medical Staff?</b>	<b>NO</b>	<b>YES</b>	<b>NO</b>
<b>Unrestricted License Required?</b>	<b>NO</b>	<b>YES</b>	<b>YES</b>
<b>Must report Duty Hours?</b>	<b>YES</b>	<b>YES</b>	<b>YES</b>
<b>Covered by UCMC Malpractice?</b>	<b>YES</b>	<b>YES</b>	<b>NO</b>
<b>Visa Issues J-1 or H-1b</b>	<b>Not permitted if J-1 H1-b under some circumstances</b>	<b>Not permitted if J-1 H-1b if qualified</b>	<b>Not permitted if J-1 H-1b must get on their own</b>

## RESIDENT/FELLOW REQUEST FOR APPROVAL OF MOONLIGHTING ACTIVITY

**Resident/Fellow Name:** \_\_\_\_\_

**Program:** \_\_\_\_\_ **PGY:** \_\_\_\_\_

**Moonlighting Activities:**

1. The UCMC does not require any Resident/Fellow to engage in moonlighting.
2. A Resident/Fellow with either a temporary Illinois license, or J-1 visa, is not permitted to engage in Moonlighting (Internal or External).
3. Residents/Fellows may engage in patient care activity beyond the scope of the GME sponsored program only with prior written approval by the Program Director.
4. In the event that approval is given for a Resident/Fellow to engage in External Moonlighting, UCMC accepts no responsibility for such practice and provides no liability coverage under the self-insurance trust unless otherwise expressly agreed to in writing between UCMC and the facility in which moonlighting will occur.
5. All moonlighting, must be counted toward the 80-weekly limit on duty hours. The resident/fellow agrees to remain in compliance with ACGME duty hour standards.
6. The Resident/Fellow understands and agrees that, except as specifically agreed in writing, s/he does not represent the University of Chicago Medical Center when engaged in External Moonlighting.
7. Except in the performance of clinical activities pursuant to the Program, no suggestion by word, uniform or use of documents that the individual functions as a representative of the University of Chicago Medical Center will be made for External Moonlighting.
8. While engaging in External Moonlighting the Resident/Fellow stipulates that no use of any equipment or documents (including prescription pads) supplied by UCMC will occur.

**Description of Proposed Moonlighting Activity (including dates):**

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**Resident/Fellow Signature:** \_\_\_\_\_ **Date:** \_\_\_\_\_

**Approved by Program Director:** \_\_\_\_\_ **Date:** \_\_\_\_\_