FIU Herbert Wertheim College of Medicine

HWCOM POLICY

HWCOM POLICY TITLE: Resident/Fellow Disclosure of Outside Activities & Commitments

HWCOM POLICY NUMBER: AA.174

INITIAL EFFECTIVE DATE:	LAST REVISION DATE:	RESPONSIBLE DEPARTMENT, DIVISION:
September 17, 2026	September 17, 2026	Department of Academic Affairs

POLICY STATEMENT

Open communication with Program Directors is essential to ensure that outside commitments support the residents/fellows educational goals and do not interfere with program responsibilities. Therefore, residents/fellows must:

1. Inform their Program Director of any outside commitments, including those established before the residency or fellowship begins.
2. Seek and obtain approval from the Program Director before engaging in any outside activity that demands significant time, such as external research, degree or certificate programs, moonlighting, consulting, business ventures, or other paid work. This notification and approval process is in addition to, and not a substitute for, any institutional requirements.

Residents/Fellows must also adhere to FIU Policy 1710.075 and Procedure 1710.075a, including disclosing reportable Outside Activities via the Outside Activity/Conflict of Interest form in the FIU Employee Portal and securing necessary approvals prior to participation. Moonlighting specifically requires compliance with FIU Policy 010.003, including prior written approval from the Program Director through the Moonlighting Request Form. [Applicability of Policy 1710.075 to house staff to be confirmed with HR/ELR and the DIO — see cover note.]

SCOPE

This policy applies to all residents and fellows in FIU-sponsored GME programs during their appointments. It covers outside activities, whether paid or unpaid, whether started before or during training, and whether on-site, remote, or off-site. Moonlighting is mainly regulated by Policy 010.003, while conflicts of interest and conflicts of commitment are managed under Policy 1710.075 and Procedure 1710.075a.

REASON FOR POLICY

Florida International University (FIU) has implemented this policy to ensure that residents and fellows are transparent with their Program Directors about activities and commitments outside their curriculum, rotations, and required training components. Prompt disclosure and, when necessary, prior approval enable the Program Director to verify that these activities align with the resident's/fellow's educational

duties, well-being, patient safety, and meet the standards set by the Accreditation Council for Graduate Medical Education (ACGME) and the institution.

This policy complements, rather than replaces, FIU Policy 010.003 (Resident/Fellow Moonlighting) and FIU Policy 1710.075 (Conflict of Interest), along with its Procedure 1710.075a. When outside activities are covered by those policies, their specific rules apply. This policy primarily defines the Program Director's role in overseeing the educational aspects of outside activities and coordinates the residents'/fellows' disclosure responsibilities across these areas.

Residency and fellowship training are full-time educational commitments. Engaging in too many outside activities can harm a resident's/fellow's education, well-being, and ability to work safely, potentially impacting patient care. ACGME rules state that such outside activities should not hinder a resident/fellow from meeting training goals, and any moonlighting hours count toward the 80-hour weekly cap. Residents/Fellows often continue research or scholarly work they began before their training or aim to start similar projects during their programs. Open and early communication with the Program Director is essential to balance these activities with educational responsibilities.

DEFINITIONS

TERM	DEFINITIONS
Outside Activity:	In line with FIU Policy 1710.075, any activity a resident/fellow engages in for an organization or individual outside the University related to their expertise, and not part of their assigned training duties, is considered an outside activity. This applies regardless of whether compensation or a monetary benefit is involved. Examples include external research, scholarly projects, extra teaching, private consulting, business or leadership roles, legal or expert consulting, and collaborations with foreign universities, entities, or governments.
Conflict of Commitment:	In accordance with FIU Policy 1710.075, an Outside Activity that disrupts the resident/fellow responsibilities—such as requiring frequent or extended absences or occupying a significant part of the resident/fellow training time—is considered a conflict.
Ongoing Significant Time Commitment:	An outside activity that recurs or persists over a period and may reasonably be expected to cause a Conflict of Commitment or impact on the resident/fellow performance, availability, work readiness, or educational progress.
Moonlighting:	As defined in FIU Policy 010.003 — voluntary, compensated, medically related work performed outside the requirements of the training program, including internal and external moonlighting. All moonlighting is governed by Policy 010.003.
Monitoring Plan:	As defined in FIU Policy 1710.075 — a written plan to manage a Conflict of Interest or Conflict of Commitment so that the Outside Activity falls within a manageable level.

ROLES AND RESPONSIBILITIES

Disclosure of existing commitments.

1. During onboarding, and no later than 30 days after starting, each resident/fellow must reveal all outside commitments to the Program Director, including details about their nature, scope, and expected time commitment.

2. Residents/Fellows are also responsible for promptly updating this disclosure if any existing commitments change significantly.

Prospective approval of new commitments.
Before starting any new outside activity that requires a significant ongoing time commitment, the resident/fellow must submit a written request to the Program Director. For moonlighting, this request is made using the Moonlighting Request Form specified in Policy 010.003. The resident/fellow may not begin the activity until they receive written approval.

Program Director review. In reviewing a disclosure or request, the Program Director considers, at a minimum, whether the activity:

- Interferes with the residents/fellows ability to meet the goals and objectives of the educational program.
- May impact the resident's/fellow's fitness for work, well-being, or fatigue management, or potentially compromise patient safety.
- The activity is compatible with clinical and educational work-hour limits, including counting moonlighting hours toward the 80-hour weekly maximum as outlined in Policy 010.003.
- Additionally, it may constitute a Conflict of Interest or Conflict of Commitment under Policy 1710.075 and must comply with relevant licensure, immigration, payer, and institutional requirements.

The Program Director may approve, approve with conditions, defer pending further information, or deny the request, documenting the decision and its rationale. If a Conflict of Interest or Conflict of Commitment is involved, the issue is referred to and handled in accordance with Policy 1710.075 and Procedure 1710.075a, which may result in a Monitoring Plan or other actions.

Documentation. All disclosures, requests, approvals, conditions, and denials are maintained in the resident's/fellow's file within the residency management system, in accordance with the recordkeeping practices outlined in Policy 010.003.

Ongoing monitoring. Approvals are temporary. The Program Director regularly reviews active commitments and may modify or revoke approval if an activity risks the resident's/fellow's educational progress, performance, well-being, or patient safety, in accordance with Policy 010.003 on moonlighting, including its monitoring and loss-of-privileges provisions.

Non-Compliance
Not disclosing an outside commitment or undertaking one that requires prior approval without securing it, breaches this policy. These violations can be addressed through the program's and the institution's academic and disciplinary procedures, in accordance with due process and grievance policies. For reportable Outside Activities, the consequences in Procedure 1710.075a also apply, including discipline for nondisclosure and, in cases of undisclosed externally funded research, suspension pending investigation and further action as outlined by Florida Statute 1012.977.

RELATED RESOURCES

FIU Policy 010.003 — Resident/Fellow Moonlighting
FIU Policy 1710.075 and Procedure 1710.075a — Conflict of Interest
Resident/Fellow Clinical Work and Educational Hours
Resident/Fellow Fatigue Mitigation
Florida Code of Ethics (Chapter 112, Part III, Florida Statutes)
ACGME Common Program Requirements and ACGME Institutional Requirements

CONTACTS

Office of Graduate Medical Education
gmeoffice@fiu.edu

HISTORY

Initial Effective Date: September 17, 2026
Review Dates: September 17, 2026
Revision Dates: September 17, 2026

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HWCOM PROCEDURE

HWCOM PROCEDURE TITLE: Resident/Fellow Disclosure of Outside Activities & Commitments

HWCOM PROCEDURE NUMBER: AA.175P

INITIAL EFFECTIVE DATE:	LAST REVISION DATE:	RESPONSIBLE DEPARTMENT, DIVISION:
September 17, 2026	September 17, 2026	Department of Academic Affairs

PROCEDURE STATEMENT

This procedure establishes the process for residents and fellows to disclose outside activities and commitments, obtain required approvals, and maintain compliance with institutional and program requirements. It outlines the responsibilities of residents/fellows and Program Directors regarding disclosure, review, documentation, and ongoing monitoring of outside commitments.

FORMS

N/A

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