

**Policy Title:** Independent Practice Policy & Application for Fellows in ACGME-Accredited Fellowships



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## **PURPOSE**

This policy provides guidance for fellows seeking to engage in independent practice activities and ensures that such activities do not compromise a fellow's performance in a Graduate Medical Education program.

## **DEFINITIONS**

**Fellow:** Any physician enrolled in a UT Southwestern graduate medical education fellowship (subspecialty) program, who has completed a residency program in a related specialty.

**Independent Practice:** Autonomous practice as a credentialed practitioner in the fellow's core specialty that occurs during their fellowship program.

**Program Director:** The individual designated with authority and accountability for the operation of a fellowship program.

**Moonlighting:** Voluntary, compensated, medically-related work performed beyond a resident's or fellow's clinical experience and education hours and additional to the work required for successful completion of the program.

## **POLICY**

UT Southwestern and the GMEC take seriously the responsibility of ensuring a high quality-learning environment for the fellows, particularly by ensuring a proper balance between education and patient care activities within established work hour limitations. Fellowship programs may assign fellows to engage in the independent practice of their core specialty during their fellowship program. However, fellows are not and must not be required to engage in independent practice. UT Southwestern or its individual GME programs may prohibit independent practice by fellows.

During fellowship training, the fellow's primary responsibility is the acquisition of knowledge, attitudes, and skills associated with the specialty in which he/she is being instructed. Without compromising the goals of fellowship training and education a program director may allow a fellow to engage in independent practice if all of the following conditions are met:

- The fellow is in good standing in the program;
- The fellow is not a J-1 visa holder;
- The fellow is licensed for unsupervised, independent medical practice in the state where the independent practice will occur;
- The fellow is board-certified or board-certified eligible;
- The responsibilities in the independent practice activities are delineated clearly in writing and are prospectively approved in writing by both the fellow's Program Director and Department Chair;
- Time spent by fellows in independent practice must be counted toward the 80-hour maximum weekly limit and must not exceed 20% of their time per week or 10 weeks of an academic year;

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- The Program Director agrees to verify that the fellow meets, and continues to meet, all requirements; and
- Written documentation of the independent practice activity is filed with the fellowship records and is available for GME Committee and Compliance Office monitoring.

Any fellow that is granted permission by his/her program director to engage in independent practice, must include the time spent in independent practice in work hour reporting. In such cases, the independent practice workload must not interfere with the ability of the fellow to achieve the goals and objectives of the GME program. Independent practice refers to someone who has board certification in a primary specialty, and therefore is NOT considered moonlighting. Each program may have its own policy on such outside activities, which may be more restrictive than that of the Institution.

The fellow's performance in the fellowship program must be monitored for the effect of independent practice activities, and adverse effects, as well as any noncompliance with this policy, may lead to withdrawal of permission to engage in independent practice. UT Southwestern or any of its graduate medical education programs may prohibit independent practice by any fellow(s).

All requests for fellows seeking to engage in independent practice activities must be reviewed and approved by the Office of Institutional Compliance and by the Office of Graduate Medical Education. See Appendix A: Application for Independent Practice.

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**Appendix A: Application for Independent Practice**

Fellows who have previously completed ACGME-accredited residency programs have demonstrated sufficient competence to enter autonomous practice within their core specialty. Therefore, fellowship programs may assign fellows to engage in the independent practice of their core specialty during their fellowship program.

This option is designed to enhance fellows' maturation and competence in their core specialty. This enables fellows to occupy a dual role in the health system: as learners in their subspecialty, and as credentialed practitioners in their core specialty. Independent practice refers to someone who has board certification in a primary specialty, and therefore is NOT considered moonlighting.

If programs permit their fellows to utilize the independent practice option, it must not exceed 20 percent of their time per week or 10 weeks of an academic year. Hours worked in independent practice during fellowship still fall under the clinical and educational work hour limits. Additional compensation is not provided for this independent practice component of the training experience, and fellows will remain subject to applicable University and hospital policies, procedures, and rules surrounding independent clinical practice.

**Request for Fellow to Engage in Independent Practice**

Fellow Name: \_\_\_\_\_

Fellow's Current Program: \_\_\_\_\_

Fellow's Current Program Training Site(s): \_\_\_\_\_

\_\_\_\_\_  
Fellow's Core Specialty: \_\_\_\_\_

Independent Practice Location(s): \_\_\_\_\_

Description of independent practice services to be provided:

\_\_\_\_\_

Dates of proposed practice: Start Date \_\_\_\_\_ End Date \_\_\_\_\_ Approx. hours/week \_\_\_\_\_

Billing at UTSW (**check one**):

- I intend to bill payors for my independent practice services, separate from my fellowship.
- I do *not* intend to bill payors for my independent practice services, separate from my fellowship.

By signing this application, I agree that:

- I will only perform services for which I am qualified to practice as a result of my prior specialty training;
- Work done as part of the independent practice option is *not* a part of my training;
- These activities will not interfere with the requirements for board certification in my subspecialty; and
- These activities will not exceed 20% of my fellowship time.
- Graduate Medical Education work hour reporting will be recorded in MedHub; and
- If I exceed my clinical and educational work hour requirements, I will report the overage to the UTSW Office of Graduate Medical Education.
- I will not receive additional compensation for these services provided as part of the independent practice component of my fellowship training.

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Signature of Fellow

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Date

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Signature of Training Program Director

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Date

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Signature of Department Chair

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Date

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Signature of GME Office Representative

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Date

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Signature of Institutional Compliance Representative

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Date