



TITLE: Pharmacy Resident Duty Hours, Moonlighting	
SECTION: Pharmacy	SECTION: Pharmacy
EFFECTIVE DATE: July 1, 2016	REVIEWED/REVISED DATE(S): January-2017; May-2019; April-2023
<u>AFFECTED AREAS</u> All TriHealth pharmacy residency programs	
POLICY OWNER: Residency Program Director(s)	
APPROVED BY: VP of Pharmacy Services	

PURPOSE

This policy addresses requirements from the American Society of Health-System Pharmacists (ASHP) to address resident duty hours and external moonlighting. Specifically, this addresses ASHP Accreditation Standard for Postgraduate Residency Programs Standards 2.3, 2.3.a, 2.3.b, 2.3.b.1, 2.3.b.2, 2.3.c, and 2.3.d:

2.3 Programs ensure compliance with the *ASHP Duty Hour Requirements for Pharmacy Residencies* through the development of program policies, processes, or program documents as it applies to the following:

- 2.3.a** The web link for the *ASHP Duty Hour Requirements for Pharmacy Residencies* is included in the program's duty hour policy.
- 2.3.b** A process for monitoring compliance on a monthly basis includes:
 - 2.3.b.1** Documenting compliance with all duty hour requirements including hours worked, hours free of work, moonlighting, and frequency of all on-call programs.
 - 2.3.b.2** Process for assessing instances of non-compliance and actions to be taken to prevent exceeding duty hours.
- 2.3.c** Documentation of moonlighting policy.
- 2.3.d** Documentation of the type of and requirements of on-call programs, if applicable.

BACKGROUND

Key components of this policy are derived from the *ASHP Duty Hour Requirements for Pharmacy Residencies*:

<https://www.ashp.org/-/media/assets/professional-development/residencies/docs/duty-hour-requirements.pdf>

Residency program directors and preceptors have the professional responsibility to provide residents with a sound training program that must be planned, scheduled, and balanced with concerns for patients' safety and residents' well-being. Therefore, programs must comply with the requirements outlined in this policy to ensure optimal clinical experience and education for their program's residents.

ASHP Statement on Well-Being and Resilience

- Residents are at an increased risk for burnout and depression due to the nature of the healthcare environment and psychological, emotional, and physical well-being are critical in the development of the competent, caring, and resilient pharmacist.
- As part of the development of the resident, it is the responsibility of the pharmacy leaders, including the Residency Program Director/Coordinator, and Pharmacy Managers, to ensure residents are educated on wellness and resilience, including education on burnout syndrome, the risks, and mitigation strategies as part of the orientation to the residency.
- It is also the responsibility of pharmacy leaders to ensure preceptors are educated on burnout syndrome, including the risks and mitigation strategies, in order to help identify and provide resources for at-risk residents, and to recognize when it may be in the best interest of patients to transition care to another qualified, rested pharmacist.
- As part of promoting a culture of wellness, pharmacy leaders must ensure that there is not excessive reliance on residents to fulfill service obligations that do not contribute to the educational value of the residency program or that may compromise residents' fitness for duty and endanger patient safety. However, as members of the healthcare team, residents may be required to participate in departmental coverage in times of unusual circumstances/state of emergency situations (e.g., mass-casualty, downtime, and natural disasters, pandemic) that go beyond the designated duty hours for a limited timeframe.

DUTY HOUR REQUIREMENTS

Duty hours: Defined as all hours spent on scheduled clinical and academic activities, regardless of setting, related to the pharmacy residency program that are required to meet the educational goals and objectives of the program.

- Duty hours **include:** Inpatient and outpatient patient care (resident providing care within a facility, a patient's home, or from the resident's home when activities are assigned to be completed virtually); staffing/service commitment; in-house call; administrative duties; work from home activities (i.e., taking calls from home and utilizing electronic health record related to at-home call program); and scheduled and assigned activities, such as conferences, committee meetings, classroom time

associated with required teaching activities and health and wellness events that are required to meet the goals and objectives of the residency program.

- Duty hours **exclude**: Reading, studying, and academic preparation time (e.g., presentations, journal clubs, closing knowledge gaps); travel time (e.g., to and from work, conferences); and hours that are not scheduled by the residency program director or a preceptor.

Policy:

- Maximum Hours of Work per Week
 - Duty hours must be limited to no more than 80 hours per week, inclusive of internal and external moonlighting.
- Mandatory Duty-Free Times
 - Residents must have a minimum of one day in seven days free of duty (when averaged over four weeks). Despite this, residents may be scheduled to work for more than seven days in a row.
 - Residents must have at a minimum of 8 hours between scheduled duty periods.
- Continuous duty is defined as assigned duty periods without breaks for strategic napping or resting to reduce fatigue or sleep deprivation.
 - Continuous duty periods for residents should not exceed 16 hours.
 - Should In-House or At-Home Call Programs be developed, they will adhere to the ASHP Duty Hours policy.
- Tracking of Compliance with Duty Hours
 - Residents are required to document hours worked within the Duty Hours Log Spreadsheet on a daily basis and/or submit attestations of compliance generated from PharmAcademic™ on a monthly basis.
 - The Residency Program Director (RPD) will review duty hour documentation on a monthly basis to ensure compliance.
 - Any instances of non-compliance with this policy identified (including lack of documentation/attestation of Duty Hours) will be assessed and actions taken, as needed, to avoid future instances of non-compliance.

MOONLIGHTING

Moonlighting: defined as any voluntary, compensated, work performed outside the organization (external), or within the organization where the resident is in training (internal). These are compensated hours beyond the resident's salary and are not part of the scheduled duty periods of the residency program.

Policy:

Moonlighting (internal or external) must not interfere with the ability of the resident to achieve the educational goals and objectives of the residency program, and must not interfere with the resident's fitness for work nor compromise patient safety. It is at the discretion of the residency program director whether to permit or to withdraw moonlighting privileges. All moonlighting hours must be counted towards the clinical experience and educational work 80-hour maximum weekly hour limit and included in the tracking of hours.

It is the expectation the resident's primary professional obligation is to fulfill all responsibilities of the residency program. However, internal and/or external moonlighting will be permitted during the residency year if the following conditions are met, and procedure adhered to:

- Residents must be in good standing and not be under a formal remediation plan
- The resident must notify the Program Director/Coordinator in writing the terms of external employment and anticipated hours worked
- The Program Director/Coordinator must approve anticipated moonlighting hours
- The resident must notify preceptors of anticipated moonlighting hours prior to the start of the rotation or as early as reasonably possible
- Any moonlighting hours are not to interfere with requirements of the residency program and should not overlap with scheduled duty hours
- All moonlighting hours worked must be reported in writing on the Duty Hour Tracking log and through attestation within PharmAcademic™
- Moonlighting hours must not exceed 16 per week, or lead to total duty hours worked exceeding 80 per week
- Residents may not use PTO or paid sick leave to work moonlighting shifts
- The expectations of each resident successfully completing residency program goals, objectives, and evaluations remain unchanged

The privilege to participate in moonlighting may be revoked if:

- The resident's participation in moonlighting affects their judgment or performance while on scheduled program duty hours
- Moonlighting results in violations of duty hour limits

OTHER AREAS/POLICIES OR PROCEDURES OF REFERENCE

- Good Samaritan & Bethesda North TriHealth Hospital Postgraduate Residency Manuals
- American Society of Health-System Pharmacists, Inc. ASHP Accreditation Standard for Postgraduate Residency Programs (Published August 2022, Effective July 1, 2023).
- American Society of Health-System Pharmacists Duty Hour Requirements for Pharmacy Residencies (3-11-2022).