

FREQUENTLY ASKED QUESTIONS

OUTSIDE WORK

The following FAQs are intended to help UW Medicine workforce members, including faculty, non-faculty healthcare professionals, trainees and staff, navigate the applicable laws, policies and rules governing outside work activities.

UW Medicine recognizes that you may be interested in engaging in work outside of your official duties. At the same time, your outside work activities should not adversely impact your official UW Medicine work duties by affecting your performance or decision-making objectivity.

The Washington State Ethics in Public Service Act (State Ethics Act) requires state employees to ensure any outside work, including consulting and other activities, do not conflict with the official duties of their state employment. In addition to these outside work requirements, UW Medicine workforce members who are UW (state) employees are also subject to the outside work rules under one of two specific UW policies which are based on the State Ethics Act:

1. All UW professional or classified staff members are subject to the outside work requirements under UW Administrative Policy Statement (APS) 47.3. This includes those who are employees of a shared services department, such as IT Services, Human Resources, Compliance, Advancement, Strategic Marketing & Communications, etc. Employees subject to APS 47.3 must complete and submit [Form 1555](#).
2. School of Medicine (SOM) employees who are faculty, librarians, or other academic personnel are subject to the outside work requirements under UW Executive Order (EO) 57. SOM faculty subject to EO 57 must complete and submit [Form 1460 using the SOM portal](#).

If your job responsibilities include decision-making about contracting or purchasing with specific vendors, you should be aware that you are likely considered to be a “Section 4” employee with greater restrictions on the type of outside work you may be able to perform on behalf of those vendors.¹ The [Washington State Executive Ethics Board \(EEB\) website](#) has additional resources that you are encouraged to review for more specific information on outside work restrictions that may apply to you.²

While you must comply with the policies applicable to your employment site, the following principles apply to all UW Medicine employees, regardless of the employing entity.

¹ “Section 4” refers to the restrictions in the State Ethics Act at RCW 42.52.150(4).

² The WA State Executive Ethics Board’s Ethics in Public Service Act [website](#) includes [Training and Resources](#) as well as Advisory Opinion categories such as [Compensation for Outside Activities / Employment](#), which provide additional information and guidelines for state employees on outside work and examples of situations which could be a conflict of interest, such those subject to “Section 4” restrictions.

Principles:

- Do not use your official position for private or personal benefit.
- Never disclose confidential UW Medicine information acquired in the course of your official duties to another person or entity for which you perform outside work unless it is necessary while providing services on behalf of UW Medicine.
- Do not use UW Medicine resources such as facilities, computers, and equipment to conduct or promote outside work.

The following are frequently asked outside work questions. If you have additional questions that are not addressed below, please consult your department chair, director, hospital/clinic/lab supervisor or manager. You may also contact UW Medicine Compliance at comply@uw.edu / 206.543.3098 for additional guidance, but please note that UW Medicine Compliance has no decision-making authority to approve or deny outside work requests.

1. Why does UW Medicine care whether I engage in outside work?

Outside work can potentially create a conflict of interest with your UW Medicine position. The concern is that you might use or be perceived as using your position and/or UW Medicine resources for direct or indirect personal gain. There is even greater potential for conflicts if you are in a position to influence a UW Medicine purchasing or leasing decision and your outside work involves a vendor or potential vendor. Additionally, too much time spent on outside work may conflict with your commitment to your UW Medicine position.

There are several policies and laws that govern outside work activities, and they are listed in the reference section at the end of this document.

2. What should I do if I want to engage in outside work?

Regardless of whether you are a UW employee (e.g., a UWMC or HMC employee, a School of Medicine employee, etc.), including those who are Professional or Classified employees, or any employee of another entity such as Valley Medical Center, you must obtain written pre-approval to perform any outside work. UW employees must follow the steps and use the required forms in accordance with the applicable policies in the introduction section at the top of this FAQ. This applies to both paid and unpaid work (including some types of volunteer work which may involve any significant time commitments). Ultimately, you should disclose any proposed outside work to your manager/supervisor, and then follow the necessary steps for review.

3. Is any outside work prohibited?

Outside work requests will not be approved if the activity creates an actual or perceived conflict of interest with your UW Medicine work that cannot be managed, violates an applicable policy, or is illegal.

The following groups of individuals are prohibited from performing outside work for a vendor of services or products that UW Medicine may use:

- Employees in management positions at UW Medicine.
- Employees who participate in the contracting process for the vendor.
- Employees who review the services or products that UW Medicine may purchase from the vendor.

Consult the [UW Medicine Compliance Code of Conduct](#), as well as other policies described in the introduction section at the top of this FAQ for further details.

4. As a UW School of Medicine (SOM) faculty member, I have specific questions about what I may and may not do as outside work. Where can I find more information?

In addition to EO 57, SOM faculty members are also subject to the [UW School of Medicine Policy on Potential Financial Conflicts of Interest for Commercial and Non-Profit Entities](#). It is a more stringent policy developed by a committee appointed by the Dean and vetted with the chairs and faculty.³ For SOM specific information about outside work, including FAQs, please see the SOM Intranet site, which can be found here: <https://depts.washington.edu/uwsom/compliance/outside-work>.

5. I am a manager/supervisor. Can you please give me some examples of outside work that could potentially be a conflict of interest that I need to be aware of if my staff members request outside work approval?

Each individual outside work request must be reviewed on its own merits and the specific details about the outside work responsibilities and how those relate to the employee's UW Medicine job responsibilities will be a crucial part of the decision. For example, there would be a significant potential conflict of interest for a UW Medicine Radiology Imaging Supervisor who makes purchasing decisions in their UW Medicine role and wanted to do outside work for a radiology imaging equipment vendor. There would be less concern if that same person wanted to do outside work at their neighborhood café on weekends.

Similarly, it is commonplace for UW Medicine nurses, coders, and other personnel to engage in outside work activities at other regional healthcare organizations. Each employee must ensure that their UW Medicine job duties are kept totally separate from those job duties at other hospitals – e.g., patients' medical records and related information is not inappropriately accessed or shared without a bona fide healthcare-related reason (treatment, payment, or operations) for doing so.

³ UW School of Medicine faculty who are paid by the University of Washington or paid directly by a close affiliate (for example, UW Physicians, Children's University Medical Group, Fred Hutchinson Cancer Research Center, Puget Sound Blood Bank, or the Veterans Health Administration) and deployed at a non-UW site must follow all applicable conflict of interest policies. If there is a conflict between policies, the more stringent policy will control.

6. As a resident/fellow in the SOM, I have specific questions about what I may and may not do as outside work. Where can I find more information?

Medical and dental residents and fellows in the SOM are subject to the *Moonlighting and Outside Work Policy*, which is managed and overseen by the Graduated Medical Education (GME) Office. This policy specifically adapts the requirements of outside work to residents and fellows and differs from other policies within UW Medicine. The policy can be found on the GME Policies and Procedures page: <https://sites.uw.edu/uwgme/policies-procedures/>. Questions should be directed to uwgme@uw.edu.

7. I am interested in participating in a conference, training, or similar event as a speaker, presenter, or panelist, and have been offered sponsored travel (e.g., airfare, hotel accommodations, registration fees, etc.). Is this activity considered to be outside work?

It depends on the details of the proposal, including your work responsibilities and the organization hosting the event. Vendors may pay for your travel expenses as part of a contractual arrangement between a UW Medicine entity and the paying vendor, such as a purchasing agreement or professional services agreement. Otherwise, outside work approval may be required.

See the below FAQs and Policies for additional information:

- [Sponsored Travel FAQs](#)
- [UW Administrative Policy Statement 47.3: Outside Consulting Activities and Part-Time Employment by Professional or Classified Staff Employees](#)
- [UW Executive Order 57: Outside Professional Work Policy \(applies to SOM faculty, librarians, or other academic personnel\)](#)
- [UW SOM Policy on Potential Financial Conflicts of Interest for Commercial and Non-Profit Entities](#)
- [UW Executive Order 43: Policy Governing Acceptance of Honoraria](#)

REFERENCES

Executive Order No. 32: Employee Responsibilities and Employee Conflict of Interest:
<https://www.washington.edu/admin/rules/policies/PO/EO32.html>

Executive Order No. 43: Policy Governing Acceptance of Honoraria:
<https://www.washington.edu/admin/rules/policies/PO/EO43.html>

Executive Order No. 57: Outside Professional Work Policy:
<https://www.washington.edu/admin/rules/policies/PO/EO57.html>

UW Administrative Policy Statement 47.2: Personal Use of University Facilities, Computers, and Equipment by University Employees:
<https://www.washington.edu/admin/rules/policies/APS/47.02.html>

UW Administrative Policy Statement 47.3: Outside Consulting Activities and Part-Time Employment by Professional or Classified Staff Employees:

<https://www.washington.edu/admin/rules/policies/APS/47.03.html>

UW Medicine Compliance Code of Conduct:

https://depts.washington.edu/comply/docs/UWM_CodeofConduct.pdf

UW School of Medicine Policy on Potential Financial Conflicts of Interest for Commercial and Non-Profit Entities:

<https://www.uwmedicine.org/about/policies-and-notice/conflicts-interest-commercial-non-profit-entities>

Washington State Code of Ethics for Municipal Officers – Contract Interests: Remote Interests:

<https://apps.leg.wa.gov/rcw/default.aspx?cite=42.23.040>

Washington State Ethics In Public Service Act: <https://apps.leg.wa.gov/rcw/default.aspx?cite=42.52>