

# FREQUENTLY ASKED QUESTIONS

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## 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/consulting.

UW Medicine recognizes that you may have an interest in engaging in work outside of your official duties. At the same time, outside employment should not adversely impact your independence and objectivity in making decisions or detract from the performance of your official duties while working for UW Medicine.

In addition to the outside work rules under the State Ethics Law, UW Medicine workforce members who are UW (state) employees are also subject to the outside work rules under one of two specific UW policies:

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.
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 57.

If your job responsibilities include decision-making about contracting or purchasing with specific vendors, you should be aware that there are greater restrictions on the type of outside work you may be able to perform on behalf of those vendors. If you are a state employee and have this type of job responsibility, then you are likely considered to be a “Section 4” employee with respect to the specific vendors with whom you are engaged in contract or purchasing decision-making. The [Washington State Executive Ethics Board \(EEB\) website](#) has additional resources which you are encouraged to review for more specific information on outside work restrictions that may apply to you.<sup>1</sup>

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

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<sup>1</sup> 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:

- You must not use your official position for private or personal benefit.
- You must 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 in the course of providing services on behalf of UW Medicine.
- Institutional resources such as facilities, computers and equipment may not be used to conduct or promote outside work.

The following questions are frequently asked. If you have additional questions about outside work, consult your department chair, director, or hospital/clinic/lab supervisor or manager. Additionally, please contact UW Medicine Compliance at 206.543.3098 for additional guidance. Please note: 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 the UW Medicine assets for either direct or indirect personal gain. There is even greater concern 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 a number of policies and laws that govern this area, and they are listed in the reference section at the end of this document.

**2. What are the requirements for outside work?**

Depending on 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 is prohibited if it creates an actual or perceived conflict of interest that cannot be managed, or if the outside work 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 faculty member, I have specific questions about what I may and may not do as outside work. Where can I find more information?**

UW School of Medicine faculty members are 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 with the faculty. Links to the School of Medicine policies appear below and where the answers to a specific set of Frequently Asked Questions may be found.<sup>2</sup>

There are distinctions between the types of outside work that may be performed by SOM faculty. For specific information about what's permitted please see the links to the School of Medicine policies and the answers to Frequently Asked Questions, which can be found here: <https://depts.washington.edu/uwsom/compliance/outside-work>.

**5. I am a manager. 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 specific UW Medicine job responsibilities will be a crucial part of the decision. For example, there would likely be a more significant potential conflict of interest if a UW Medicine Radiology Imaging Supervisor who makes purchase decisions wanted to do outside work for a vendor from whom UW Medicine purchases radiology imaging equipment than if this same person wanted to do outside work at their neighborhood café on weekends.

By the same token, it is commonplace for UW Medicine nurses, coders, and other personnel to have outside work at other hospitals outside of UW Medicine. 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 bonafide healthcare-related reason (treatment, payment, or operations) for doing so.

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<sup>2</sup> 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 UW School of Medicine, 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 UW School of Medicine are subject to the *Policy on Working Outside of the Training Program*, 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](mailto:uwgme@uw.edu).

**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. 57: Outside Professional Work Policy:  
<https://www.washington.edu/admin/rules/policies/PO/EO57.html>

Public Disclosure Commission: <http://www.pdc.wa.gov>

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

UW Medicine Compliance Code of Conduct:  
[http://depts.washington.edu/comply/docs/UWM\\_CodeofConduct.pdf](http://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-notices/conflicts-interest-commercial-non-profit-entities>

Washington State Code of Ethics for Municipal Officers – Contract Interests: Remote Interests:  
<http://apps.leg.wa.gov/rcw/default.aspx?cite=42.23.040>

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