David J. Schnall

By the Light of the Moon: Interfacing Halakhah and Employee Relations

Recent government statistics suggest that over 7.2 million American workers currently hold more than one regular job. Known variously as "moonlighting," supplementary employment or multiple job-holding, it includes members of the work-force who hold primary jobs, generally full-time, while supplementing their incomes with full or part-time employment, after-hours.

Though they constitute only about one in twenty workers, the presence of these multiple job-holders has consistently increased over the past two decades, both in numbers and proportion. For example, in 1975 only 4.7% of all workers held more than one job. However, a special survey conducted by the United States Department of Labor indicated that, by 1989, the rate had risen to 6.2%. Significantly, the percentage of female workers who engaged in moonlighting in 1975 was only 2.9%. By 1989, that figure more than doubled to 5.9%.[1]

The data reflect several socioeconomic factors. Almost half of those surveyed indicated that they indulged in moonlighting to meet regular household expenses and pay off current debt. The fact that highest rates were recorded among married men between 35-44 years of age reinforces the phenomenon.

The findings also reflect increases in the percentage of women in

This paper is dedicated to the memory of Rabbi I. Harry Shoulson, for whom the union of Torah u-Madda was a way of life.

the work-force, especially single heads of households unable to subsist on one salary alone. Indeed, of all women, the rate of multiple job-holding was highest among those who were widowed, divorced or separated. About two-thirds of these women indicated that this was their means of meeting regular household expenses and current debt.[2]

Finally, the increases were a function of the expanding economy of the 1980's during which time skilled and professional labor were in sharp demand. This allowed industry to take advantage of an abundance of employees who made themselves available after hours. Workers employed in public administration, service industries and education were among the most likely to moonlight, with university professors especially notable. The high rates in these areas probably reflect greater control over scheduling and possession of skills transferable both within and across industry bounds.[3]

Such increases pose a series of dilemmas for the large organizations that are the primary employers of these moonlighters and a lively debate in several professional literatures has emerged. As expected, advocates are found both on the side of management as well as that of labor.[4]

The most obvious managerial concern is that employees maintain a requisite level of quality, productivity and performance at their "regular jobs" in the face of their responsibilities elsewhere. Employers have a right to expect that the energies of their work-force will not be sapped and that workers will present themselves in a proper condition for the job. The point bespeaks physical readiness, emotional stability and job motivation.

More subtle concerns regard potential conflicts of interest, competition and client/customer "raiding." Employers worry that multiple job-holding employees may compromise the integrity of the service they provide because of their personal interests outside the organization. While this is a consideration no matter what the employment status of the worker, having a second job increases the potential of concern.

Similarly, multiple job-holders who remain in the same industry after hours may be in direct competition with their primary employers. This occurs whether they are self-employed or, worse yet, if they "moonlight" for a competitor. Access to clients, proprietary information and support personnel, make the problem still more acute. The temptation to "make business" for oneself, i.e. attract clients away or suggest that they be in direct contact for future services, may be more than any employer can bear. Indeed, some managers even report that pilferage of supplies and equipment increases when employees moonlight.[5]

Finally, an argument is made against moonlighting on broader social grounds. The claim is that supplementary employment frequently means entre to the "underground economy." Moonlighters may avoid reporting their second income to the government or indulge in questionable practices to reduce their tax liabilities and benefit payments or deductions. In addition, those who are already employed full-time remove jobs from the market when they moonlight, thus depriving others who are still in need of primary employment.[6]

Consequently, employers argue that, at the very least, they should be consulted before a worker accepts assignments elsewhere. Beyond that, multiple job-holding should be at the discretion of the employer on a case-by-case basis. Determinations should be made in the context of the performance record of the worker, the type of work to be accepted, and the needs of the primary employer. Finally, employers should reserve the right to rescind the agreement if circumstances change or prove untenable.

By contrast, a substantial case has been made in favor of multiple employment. Notwithstanding concern for the energy and motivation of the work-force, advocates argue that it is a means of retaining and satisfying talented workers when an employer cannot continue to raise salary or benefits. But for moonlighting, they suggest, these employees would leave for other, more attractive positions elsewhere.

In addition, employees who moonlight gain valuable experience and learn important skills that they can be expected to utilize at their primary places of employment. It also helps satisfy their need for challenge, personal growth and relief from job routine. Also, concern for proprietary access runs in both directions and may ultimately cancel itself.

In broader social terms, the jobs that moonlighters take are largely in their own private businesses or those that would not suffice as full-time employment. Consequently, they are not removing opportunities from the unemployed, who, in most instances, would not qualify for the specialized work involved in any case. On the contrary, they are helping fill an important need in organizations that could not otherwise afford to hire new employees.

Finally, the nature of primary employment commits a worker to a given number of hours per week, prearranged by formal contract, letter of appointment and industry practice. Despite the benefits or costs that may accrue, what workers do on their own time is outside the purview of the employer. They should have the right to exercise that option without managerial interference.[7]

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What follows is an analysis of multiple employment from the perspective of Halakhah and classical Jewish sources as they reflect up on employee relations generally. It is part of the author's on-going series of studies attempting to apply classic Jewish sources to contemporary social issues in the family, the workplace and the community.[8]

Apparently, concern over multiple employment dates back to antiquity and was sufficient to merit inclusion in talmudic discourse. Early rulings appear to favor the employer's position on the question. Parallel references found in the *Tosefta (Bava Mezia* 8:2) and the *Talmud Yerushalmi (Demai* 7:3) suggest that employees have a distinct responsibility to see that they perform efficiently on the job. Among other considerations, this includes a proscription against working after hours. Consider the following statement from the *Tosefta:*

> A worker is not permitted to fulfill his own responsibilities by night so that he can hire himself by day. Nor may he plow with his ox by night and then lease her by day. Nor should he starve and thirst himself to feed his family, for this constitutes theft of the employer's work. He will sap his strength and weaken his mind and not do his work with energy.

Both the language and context of this passage reflect a commitment to full productivity; anything that reduces the ability of the worker to perform is disallowed. This means that he must care for his mental and physical health, being sure to eat and rest properly. After-hours employment is seen as an impediment to productivity and therefore prohibited. The ruling of the *Tosefta* is cited as binding by Rif, Rosh, Mordekhai and the *Shulhan 'Arukh.*[9]

Parenthetically, in its version of this ruling, the *Talmud Yerushalmi* relates an incident involving Rav Yohanan who visited a town and was introduced to its teacher, an emaciated individual in dire need of a meal. Upon inquiring, Rav Yohanan was told that the *melamed* was given to fasting regularly as a sign of his religious devotion. The visiting rabbi reprimanded the teacher. Such behavior was unacceptable, he said, even in more mundane occupations. Surely one involved in God's work, e.g. educating children in the ways of Torah, could ill-afford this misguided piety. While the point resonates about the special responsibilities of teachers, it also clearly reflects the talmudic attitude toward worker productivity at-large.

Similarly, in closing his discussion relating to the hire of workers and the lease of real estate and chattels, Rambam cites the *Tosefta* almost verbatim. Then, by way of summarizing the general attitude toward worker productivity, he adds:

> Just as the employer is warned not to steal the wages of the poor nor to oppress him, so too is the employee forewarned not to steal the labor of his employer by wasting a bit here and there and completing the day with trickery. Instead, he must be most demanding upon himself and his time.[10]

He invokes the example of Ya'akov Avinu, who worked for his father-in-law, Lavan, with all his energies, and who was rewarded handily for his efforts. If this is required, despite the poor treatment and abuse that he suffered as an employee, surely it stands as a model for labor relations generally. In commenting on Rambam's ruling, R. Vidal of Tolosa, in his *Maggid Mishneh*, avers from his usual practice of providing references and precedents for Rambam's position. Instead, he writes simply, "*zeh pashut*," the point is self-evident.

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Nevertheless, this ruling is also not without its exemptions. Most obviously, an employer and an employee can agree to an arrangement that would allow moonlighting privileges.[11] Furthermore, *minhag*, or local custom and usage, plays an important role in employee relations—as it does in other halakhic contexts. Defined by geographic setting and/or industry standard, a *minhag* may be invoked to help specify, modify and even override a strict interpretation of the Halakhah. For example, the Mishnah (*Bava Mezia* 83a) rules:

> One who hires workers and demands that they rise early and work late, in a place where it is not the custom [*minhag*] to rise early nor to work late, he may not force them. Where it is the custom to provide food, he must provide food, to offer fruit refreshments, he must offer fruit refreshments. Everything [is measured] by the custom of the locality.

By strict Halakhah, employment standards require a worker to leave his home with the rising sun and remain at work until dark. However, this demand is nullified by local usage. Of course, contrary stipulation can be explicitly stated in the employment contract, to which all parties must agree. Absent such stipulation, however, the employer is without prerogative, even if he offers to pay for the overtime. The major *posekim* unanimously cite this Mishnah as binding.[12]

In truth, this may be less a matter of the pre-eminence of local usage than it superficially appears to be. Rather, it may be a variation of the theme described earlier: that parties to a contract are largely free to tailor an agreement as they see fit. In this context, *minhag* is invoked as an implicit element of any employment contract.

In a locality where such practices are well-known aspects of personnel management and employee relations, they can be taken as given, unless stated otherwise. Lack of any negotiation over the question at the time of the contract suggests that it was understood and accepted by the parties to the agreement. The employer's subsequent attempt to demand a more rigorous work schedule becomes an abrogation of the spirit and the presumptions of the contract. This is reflected in an early *teshuvah* by Rabbenu Gershom Me'or ha-Golah. Regarding a teacher who had taken upon himself private tutoring and writing assignments after-hours, he argues that, absent prior arrangements to the contrary,

> . . . if it is customary for other teachers to be busy with their own affairs in their time, then this one may be busy as well and no one may force upon him. . . . This Reuven, if he wrote a book at the time that other teachers are busy with their own needs, the permission is in his hands.[13]

As an aside, it is noteworthy that the subject of multiple employment among teachers, in particular, seems to have engendered a good deal of controversy. The aforementioned warning of Rav Yohanan cited by the *Yerushalmi* no doubt serves to explain part of this concern. It is also reasonable to speculate that teachers may have had longer "after-hours" periods available for such activity and their efforts required smaller investment risks than those in other trades. This may also explain the high incidence of moonlighting among educational practitioners in the United States, as cited above.

In the seventeenth century, the administration of the Talmud Torah of Verona, the local authority for primary Jewish education in the community, took great pains to remove any doubt about the contractual obligations of those employed in its schools. Its charter, dated 1688, carried several provisions banning teachers from accepting other forms of employment or study "whether permanent or temporary, so that they spend all their time studiously, in their *bet midrash*." They were further proscribed from accepting new students without the written permission of the administration. Similar limitations and proscriptions on the schedules of teachers are to be found in the charters of the Jewish communities of Krakow, Worms, Nikolsberg, Hamburg, Altona and Grunwald, during the same period.[14]

More recent sources offer other exemptions from the general restriction upon moonlighting. Rabbi Yehiel Mikhel Epstein distinguishes between different types of employees: full-time day-workers, known as *po'alim*, and independent contractors or consultants, known as *kablanim*. The *po'el* is a full-time employee who is expect-

ed to report to work on a regular basis. His after-hours involvements are, therefore, of legitimate concern to his employer. Overly strenuous activities, such as multiple employment, will inevitably sap his physical strength and motivation during normal business hours, preventing him from applying himself fully. As a result, he is proscribed from seeking additional employment unless such an arrangement had been earlier delineated. By contrast, the *kablan* owes only a project-based commitment to his client and can pace himself as he sees fit. Consequently, though he may be working on a particular job at a given time, his after-hours activities are not subject to his employer's pleasure and he may accept additional assignments at his own discretion. Indeed, even if the project is of long-term duration, the *kablan* would presumably retain this prerogative, unless he barters it away in the initial work agreement.[15]

Following this reasoning, contemporary writers have extended the exemption in directions uncharted by precedent, so much so that the original thrust of the Halakhah has been virtually nullified. For example, in his analysis of labor law in Jewish tradition, Rabbi Shillem Wahrhaftig suggests that classic proscriptions against multiple employment are time-bound and consequently hold little relation to current conditions of work and the workplace.[16] First, he argues that mandates against multiple employment were based on the concern that an employee's energy would be diminished. That makes perfect sense in an environment where the workday begins at dawn and continues until dark, the modal abstract presumed by the Mishnah cited above.

However, that is no longer the case in most Western social systems, where the workday is typically limited to eight hours or less. Under those circumstances, employees are quite physically able to engage in supplementary activities without interfering with their primary responsibilities on-the-job. In this sense, the *po'el* of today has become something akin to the *kablan* of old. Sufficient time is now available in the course of the workday so that even regular, full-time employees can presume discretion over their schedules, as long as their responsibilities are fulfilled and their workload completed.

In addition, Wahrhaftig argues, classic opposition to supplementary employment is rooted in a period when workers had no reason to presume discretion over their schedules. If they were hired to do a job, it was their sole commitment. However, the modern work schedule, limited as it is to the eight-hour day or the forty-hour week, is tantamount to a *minhag* in which this discretion is an assumed element in the work agreement. The employer who would remove that discretion must so stipulate at the time of contract.

A still more progressive note is struck by Rabbi Aaron Levine. Beginning with the same assumptions, he argues that the concerns of Halakhah are borne out of fear for the employee's stamina. However, work performance is not a function of hours per se and should, therefore, be subject to an empirical evaluation made by management. Thus, employees may presume the right to supplementary employment even when

> no widespread practice of accepting outside work in the subject profession can be identified, but the adverse impact of taking on the extra work does not reduce the worker's productivity below the performance level of co-workers in identical jobs.[17]

A worker is engaged to maintain a given level of productivity on the job. Unless there is some variation in levels of compensation, the employer has the right to expect whatever may be the industry's standard, but no more. As long as that is maintained, he has no claim to the worker's freedom after-hours. Conversely, a worker may presume the right to multiple employment as long as he performs to the industry standard. This may be set as part of the original contract or assessed as equivalent to the average co-worker of similar rank and salary in that organization.

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Direct discussions of this issue only concern its most obvious aspect, i.e. regarding the depletion of the energy and motivation that the employer has a right to expect from his workforce. Because productivity may suffer, an employee "is not permitted to fulfill his own responsibilities by night so that he can hire himself by day." However, regarding the second element of proprietary concern, that which relates to potential conflicts of interest, access to information and clientele, and the tendency to work at private business during the workday, Halakhah is largely silent.

Intuitively, however, it seems that the thrust of the Halakhah would be opposed. This may be gleaned, for example, from the exhortations of Rambam cited above. A worker who takes time for his own projects or who subtly solicits clients during the course of the workday would be guilty of "stealling] the labor of his employer" and "completing the day with trickery."

In addition, one might seek support for the position from another talmudic source dealing with a related matter. The *Tosefta* (*Bava Mezia*, 4:7) states:

> One who places his fellow in a shop for half the profit, if [the latter] was a craftsman, then he should not be busy with his craft, for his eyes will not be on the shop when he is involved with his craft. However, if his partner [the owner of the shop] was with him, he is permitted.

The major *posekim* cite this ruling as binding. They add that, in the event that one disregards the prohibition and does profit from private business during his watch, he is required to share part of his earnings with the owner of the shop. However, if the owner was in the shop with him: a) the full responsibility for customer service was no longer on his shoulders; b) we can assume that the owner was aware of his preoccupation; and c) if there were objections, they should have been raised. Absent such objection, we can assume that the owner concedes this privilege to his partner.[18]

Yet no inferences are made here regarding employee relations. Rather, the terms "his fellow" or "half the profit" and the entire closing sentence are taken to suggest partnership. Consequently, Rambam includes this discussion in his laws of partnership while the *Shulḥan 'Arukh* lists it among the laws of loans and interest, suggesting that one who uses a place of joint business for his own pursuits must share the profits with his partner, lest he be guilty of usury. Nevertheless, application of this ruling to employees using the workday for their own purposes may be inferred.

Indeed, elsewhere in the above-cited *teshuvah*, Rabbenu Gershom follows this line of reasoning without referring to the *Tosefta* for support. Apparently, the teacher in question there was also found to have busied himself with private concerns during the school day. Rabbenu Gershom states:

> That he wrote during the hours when children are taught, if other teachers of that locale regularly do the same, then he is permitted. If not, then he may not. And if the employer was in the same locale and knew [of this conflict] then [the teacher] may be dismissed. . . . But since he was not dismissed, certainly [the employer] accepted and conceded and was satisfied.[19]

Though somewhat cryptic, his comments parallel the *Tosefta* in part. Absent local custom to the contrary, use of the regular workday for supplemental activities may be grounds for summary dismissal unless the employer knew of his worker's practice and issued no objections. The careful employer would, therefore, do best to delineate such rules at the point of contract.

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Several comments are in order by way of summary conclusion. First, it is obvious that the issue of multiple employment is neither new nor unique to current economic systems. Apparently it was well known in pre-modern environments to the extent that its regulation was already required at the time of the *Tosefta*. In addition, notwithstanding the general inclination of Halakhah to support the worker, normative statements regarding moonlighting favor the position of the employer, unless a *minhag* exists to the contrary.

Consequently, it is crucial to determine how the existence of a *minhag* would be established. Would it emerge by formal historical, quantitative, or assumptive means? Or, alternatively, might *minhag* simply result from the informal understandings that often underpin social relations until given formal sanction by rabbinic or judicial decision? Further, should *minhag* be defined by locale, i.e., what is done in a community, or by industry standard, i.e., what is the practice in this field notwithstanding local usage, or both?

The issue is sharpened when we glance anew at the United States Government statistics cited at the beginning of this paper. The fact that over seven million workers engage in multiple employment appears to suggest the emergence of a commonplace in the American economy. Yet, is that a sufficiently large proportion by which to establish a *minhag*? After all, it constitutes no more than 6.2% of the national workforce. That the proportions are higher in specific professions, e.g. managerial employees, police officers or university instructors, turns the argument about once more. Furthermore, independent studies have suggested that official government figures are likely to yield a substantial undercount, since respondents often have a strong motivation not to be candid with official representatives of federal agencies.[20]

Finally, the *Tosefta* upon which opposition to multiple employment was based, was concerned that, by working after hours, an employee "will sap his strength and weaken his mind and not do his work with energy." Presumably, those posekim cited above follow its line of reasoning as well. However, recent empirical study indicates that this fear may be exaggerated. Though far from conclusive, research in assessing the capacities of moonlighters has found no significant differences between them and other employees. In studying job stress, emotional and physical health, job performance, motivation or absenteeism , moonlighters appear no worse off and no more likely to behave in an undesirable fashion. Indeed, some data suggest that they exhibit higher levels of job satisfaction and are also more likely to be socially active than non-moonlighters.[21] These and future findings must be included in decisions regarding the emergence of a

minhag and the applicability of one or another source in evaluating current aspects of employee relations and worker rights.

NOTES

1. "Multiple Jobholding Reached Record High in May, 1989", *Bureau of Labor Statistics News* 89-529 (November 6, 1989).1-5.
2. See Donna Dempster and Phyllis Moen, "Moonlighting Husbands: A Life-Cycle Perspective", *Work and Occupations* 16 (February, 1989): 43-64 and John Stinson, "Moonlighting by Women Jumped to Record Highs", *Monthly Labor Review* 109 (November, 1986): 22-25.
3. John Stinson, "Multiple Jobholding Up Sharply in the 1980's", *Monthly Labor Review* 113 (July, 1990): 3-10.
4. An analysis of the full literature regarding multiple employment is beyond the objectives of this paper. A cross-disciplinary review would include: C. Little, "Sociological Moonlighting: Practical Advice About Consulting for Local Government", *Sociological Practice Review* 2 (July, 1991): 217-25; M.H. Taylor and A.E. Fihner, "Moonlighting: The Practical Problems", *Canadian Public Administration* 29 (Fall, 1986): 592-97; Steven Culler and Gloria Bazzoli, "The Moonlighting Decisions of Resident Physicians", *Journal of Health Economics* 4 (September, 1985): 283-92; Cathy May, "Moonlighting. It's a Question of DP Ethics", *Data Management* 23 (March, 1985): 10; Robert Wisniewski and Paul Kliene, "Teacher Moonlighting: An Unstudied Phenomenon", *Phi Delta Kappan* 65 (August, 1984): 553-55; R.M. Pipkin, "Moonlighting In Law School", *American Bar Association Research Journal* (1982): 1109-62; Carlton J. Snow and Elliott M. Abramson, "By the Light of Dual Employment: Standards for Employer Regulation of Moonlighting", *Indiana Law Journal* 55 (Winter, 1979-1980): 581-614.
5. R. Factor, "Moonlighting: Why Training Programs Should Monitor Residents' Activities", *Hospital and Community Psychiatry* 42 (July, 1991): 738, Jeffrey Raffel and Lance Groff, "Shedding Light on the Dark Side of Teacher Moonlighting", *Educational Evaluation and Policy Analysis* 12 (Winter, 1990): 403-14; Edward Pawlak and June Bays, "Executive Perspectives on Part Time Private Practice", *Administration in Social Work* 12 (Spring, 1988): 1-11. Jeffrey Davidson, "Curtail Moonlighting with Solid Guidelines and Performance Evaluations", *Data Management* 24 (January, 1986): 26-27, John Keely and James Ryan, "Should Police Moonlight in Security Jobs", *Security Management* 27 (June, 1983): 9-18.
6. See John Stinson, "Moonlighting: A Key to Differences in Employment Growth", *Monthly Labor Review* 110 (February, 1987): 30-31 and Richard Upton, "Moonlighting: A Dark Shadow on the White Economy", *Personnel Management* 12 (March, 1980): 28-31.
7. Alice LaPlante, "Outside Work OK If You Ask", *Computerworld* 25 (December 16, 1991): 101; Ronald Factor, "What Residents Do in Their Free Time Is Their Decision", *Hospital and Community Psychiatry* 42 (July, 1991): 739-42; James Whitley, "Moonlighting: A Good Educational Experience for Residents", *Investigative Radiology* 22 (August, 1987): 693; Alan Arcuri, *et al*, "Moonlighting by Police Officers: A Way of Life", *Psychological Reports* 60 (February, 1987): 210-11; Sole Santangelo and David Lester, "Correlates of Job Satisfaction of Public School Teachers: Moonlighting, Locus of Control and Stress", *Psychological Reports* 58 (January, 1985): 130; Bruce W. Fraser, "The Moonlight Shines on White Collars", *Nation's Business* 71 (July, 1983): 52-53; Bill Waddell, "Authorized Moonlighting", *Business Forum* (Spring, 1983): 32.
8. Other papers include: "Exploratory Notes on Employee Productivity and Accountability in Classic Jewish Sources", *Journal of Business Ethics* 12 (June,

1993): 485-91; "Defining Our Jewish Mission", *Wiener Center Seminar—UJA/Federation of Jewish Philanthropies* (January, 1995); and "Antecedents of Social Casework in Mediating Domestic Discord: Notes on the Pursuit of Shalom Bayit in Classical Jewish Sources", *Journal of Jewish Communal Service* 69 (Fall, 1992): 87-91.

9. Rif on *Bava Mezia* 52b; Rosh, *Bava Mezia*, 7:5; Mordekhai, *Bava Mezia* #343; *Shulhan 'Arukh, Hoshen Mishpat* 337:19.
10. *Mishneh Torah, Hil. Sekhirut* 13:7.
11. See e.g. *Tosafot, Bava Mezia*, 83a, s.v. *ha-sokher*.
12. See *Mishneh Torah, Hil. Sekhirut*, 9:1; *Shulhan 'Arukh, Hoshen Mishpat* 331:1 and the comments of the Rema, *ad. loc.*
13. Shlomo Eidelberg, *Teshuvat Rabbenu Gershom Me'or ha-Golah* (New York, 1955), 167-68, #92.
14. See Shillem Wahrhaftig, *Dinei 'Avodah be Mishpat ha-Ivri* (Jerusalem, 1969), I, 490-92.
15. *Arukh ha-Shulhan, Hoshen Mishpat* 337:28. Distinctions between the *po'el* and the *kablan* are well-known in the literature of Halakhah, relating, for example, to the rights of a *kablan* to set his own time schedule, or those of the *po'el* to rescind a commitment. However, regarding multiple employment, the point appears unique. On differences between the *po'el* and the *kablan*, see, e.g., *Tur, Hoshen Mishpat* 333:2.
16. *Dinei 'Avodah*, 330-34.
17. Aaron Levine, *Economics and Jewish Law* (New York, 1987), 180-81.
18. See *Mishneh Torah, Hil. Shluhin ve-Shutafin* 7:7 and *Shulhan 'Arukh, Yoreh De'ah* 177:29.
19. See Eidelberg, 168.
20. See Vishwanath Baba and Muhammad Jamal, "How Much Do We Really Know About Moonlighters?", *Public Personnel Management* (Spring, 1992): 65-73 and Dempster and Moen, *op. cit.*
21. Baba and Jamal, *ibid;* Muhammad Jamal, "Is Moonlighting Mired in Myth?", *Personnel Journal* 67 (May, 1988): 48-53 and "Moonlighting: Personal, Social and Organizational Consequences", *Human Relations* 39 (November, 1986): 977-90; Muhammad Jamal and Ronald Crawford, "Consequences of Extended Work Hours: A Comparison of Moonlighters, Overtimers and Modal Employees", *Human Resources Management* 20 (Fall, 1981): 18-23.