



## GME MOONLIGHTING

Policy Title: GME Moonlighting

Policy Number:

Applies to: ESFCOM Sponsored Residency and Fellowship Programs, Trainees

Date: 05/24/18

### 1.0 Policy Statement:

It is the Elson S. Floyd College of Medicine (ESFCOM) policy to establish a specific policy that reflects the ACGME guidelines for Trainees who voluntarily wish to engage in moonlighting activities.

### 2.0 Definitions

**Accreditation Council for Graduate Medical Education (ACGME):** The ACGME is responsible for the accreditation of post-MD medical training programs within the United States.

**Designated Institutional Official (DIO):** The individual in a sponsoring institution who has the authority and responsibility for oversight and responsibility of all of the ACGME-accredited programs.

**Duty Hours:** All clinical and academic activities; i.e., patient care (both inpatient and outpatient), administrative duties relative to patient care, the provision for transfer of patient care, all in-house clinical and educational activities, clinical work done from home, and all moonlighting. Duty hours do not include reading and preparation time spent away from the duty site.

**External Moonlighting:** Voluntary, compensated, medically-related work performed outside the institution where the Trainee is in training or at any of its related participating sites.

**In-House Call:** Clinical and educational work hours, beyond the scheduled workday, when Trainees are required to be immediately available within an assigned site, as needed, for clinical responsibilities. In-house call does not include night float, being on call from home, or regularly scheduled overnight duties.

**Internal Moonlighting:** Voluntary, compensated, medically-related work (not related with training requirements) performed within the institution where the Trainee is in training or at any of its related participating sites.

**Moonlighting:** “extra work for extra pay” voluntary, compensated, medically-related work performed beyond a Trainee’s clinical experience and education hours and additional to the work required for successful completion of the program.

**Program Director:** The designated person accountable for the Program; this person must be selected by the Designated Institutional Official and possess qualifications acceptable to the appropriate Residency Review Committee (RRC) of the ACGME.

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**Trainee:** a physician in training at an ACGME accredited graduate medical education program, the term includes Interns, Residents, and Fellows or other trainee enrolled in an educational program whose education falls under the purview of the ESFCOM Office of Graduate Medical Education.

## 3.0 Responsibilities

GMEC through the DIO; Associate Dean for GME; Assistant Regional DIOs; Program Directors

## 4.0 Procedures

Moonlighting is a voluntary activity and it is not a required activity for any ESFCOM sponsored training programs. Such activities are generally discouraged because Trainee education is a full-time endeavor. Therefore, outside employment or “extra work for extra pay”, commonly known as “moonlighting” is permitted only at the discretion of the Program Director. Any interference with the GME Trainee’s ability to carry out duties or learning objectives is not acceptable. PGY-1 Trainees are not permitted to Moonlight.

It is the responsibility of the Trainee to initiate the request for moonlighting. Prior to commencement of any Moonlighting activity, Trainees who wish to Moonlight must:

- ensure that Moonlighting does not interfere with their ability to achieve the goals and objectives of their training program, including Trainee health and well-being;
- purchase and maintain their own liability coverage for approved Moonlighting activities occurring at their respective locations or obtain written assurance from the site or hiring entity that it will provide liability insurance and workers compensation coverage
- document Moonlighting hours in the trainee management system tracked by the program and GMEC
- comply with the Institutional Duty Hours Policy, which requires that all moonlighting hours count towards total duty hours
- ensure that the addition of moonlighting hours does not result in a work week in excess of the 80-hour maximum, or result in fatigue which might affect patient care or learning
- comply with individual program moonlighting policy
- complete, sign, and submit the “Permission to Engage in Moonlighting” form (see Attachment A) to the Program Director each academic year I wish to moonlight
- **NOT** moonlight without written approval from both the Program Director and the GMEC

The DIO, GMEC, and Program Director have the discretion to decide whether or not the proposed Moonlighting is compatible with the training requirements, program, or institution. The DIO, GMEC, and Program Director may prohibit or withdraw moonlighting approval at any time if the Trainee is not in compliance with the conditions of approval or if it appears that the Moonlighting activities are interfering with the Trainee’s performance or well-being. If the request to Moonlight is denied or withdrawn, no Moonlighting shall occur. The decision to deny or withdrawal a Moonlighting request is final and not subject to review.

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If the Program Director approves the Trainee’s request to Moonlight, the Program Director must:

- provide a program specific “Moonlighting” policy, in line with the ESFCOM Institutional policy, to all Trainees
- approve the Trainee’s request in writing by signing the “Permission to Engage in Moonlighting” form
- submit the “Permission to Engage in Moonlighting” form to the GMEC for review and approval
- systematically monitors and documents the Trainee’s performance to ensure that moonlighting activities are not adversely affecting patient care, Trainee well-being, or learning
- withdraw permission to moonlight if it is determined that Trainee performance is suffering
- require detailed information on the timing and level of activity to assure it does not cause fatigue or interfere with patient care or the goals and objectives of the program (This information will be kept by the Program Director.)
- include a copy of the approved “Permission to Engage in Moonlighting” form in the Trainee’s file

The GMEC will oversee the training program’s implementation and monitoring of these guidelines. The GMEC may monitor the training programs’ compliance through periodic reviews/surveys conducted with the Trainees and Program Directors and may require reports from each program. They may also audit the data provided to assure that each program has demonstrated its adherence to the policy.

## 5.0 Related Policies

GME Supervision and Accountability Policy  
GME Clinical and Educational Work Hours Policy

## 6.0 Key Search Words

Duty Hours; Work Hours; Supervision
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## 7.0 Revision History

Original Approval	Policy number	Revision Date Approval
May 24, 2018	GME	

**Responsible Office:** Designated Institutional Official; GME Office

**Policy Contact:** GME Office, GME Director, Institutional Coordinator

**Supersedes:** N/A

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## Attachment A PERMISSION TO ENGAGE IN MOONLIGHTING

Date: \_\_\_\_\_

Trainee Name: \_\_\_\_\_

Training Program Name: \_\_\_\_\_

Training Year: \_\_\_\_\_

Name of Institution where the services will be provided: \_\_\_\_\_

Name of Medical Director: \_\_\_\_\_

I would like to request permission to begin moonlighting on \_\_\_\_\_ (date).  
The estimated average number of *hours per week* that I will be moonlighting is \_\_\_\_\_ hours.

### Certification for Moonlighting

I certify that the foregoing description of my requested moonlighting activities is accurate and true. I understand that any approval of the requested moonlighting activities is conditioned on my ongoing compliance with the following assurances, and will terminate upon failure to comply with any of the following:

1. Moonlighting activity will not interfere with my educational experience, performance or training program responsibilities.
2. I will not engage in moonlighting activities during my scheduled training program hours.
3. I must remain in good standing in my approved training program.
4. Any time spent engaged in moonlighting activities *must be* counted as part of the 80 hours maximum duty hours per week.
5. I must update this request form within 7 days of any changes in my moonlighting activities.
6. I must not engage in moonlighting activities in which there may be a conflict of interest with my appointment as an ESFCOM Trainee.
7. I agree to be bound by the work hour limits of my training program and that program's Sponsoring Institution including specific Moonlighting policies.
8. My moonlighting activities must comply with applicable state and federal laws and regulations.
9. If the DIO, GMEC, or my Program Director determines a decrease in my performance or if my evaluations reflect inadequate or unsatisfactory clinical performance or educational progress, permission to engage in moonlighting may be withdrawn.
10. I understand that ESFCOM liability coverage does not apply and is not valid while participating in moonlighting activities.
11. I must provide my own liability coverage while participating in moonlighting activities.
12. I understand that failure to comply with any of these conditions may result in withdrawal of permission to engage in moonlighting or other disciplinary action.

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**I understand the above information, and I will comply with all of these conditions while engaging in moonlighting activities.**

\_\_\_\_\_  
Trainee Signature

\_\_\_\_\_  
Date:

**Program Director Approval/Disapproval:**

As Program Director, I have reviewed the above request and my determination is:

- Request Approved.** I will monitor this Trainees performance and ensure that Clinical and Educational Work Hour requirements will not be exceeded. Approval is granted subject to the above conditions through the current academic year.
- Request Denied**

\_\_\_\_\_  
Program Director Signature

\_\_\_\_\_  
Date:

**GME Approval:**

\_\_\_\_\_  
DIO or Designee Signature

\_\_\_\_\_  
Date: