

## Graduate Medical Education Committee

Updated February, 2021

### **MOONLIGHTING POLICY**

This policy applies to residents and fellows in all accredited (ACGME) training programs.

**Purpose:** This policy will address specific guidelines and procedures for residents/fellows seeking to participate in moonlighting activities.

#### **ACGME Definitions:**

- Voluntary, compensated, medically-related work performed beyond a resident's or fellow's clinical experience and education hours and additional to the work required for successful completion of the program.
  - External Moonlighting: Voluntary, compensated, medically-related work performed outside the site where the resident or fellow is in training and any of its related participating sites.
  - Internal Moonlighting: Voluntary, compensated, medically-related work performed within the site where the resident or fellow is in training or at any of its related participating sites.

#### **Sponsoring Institution Requirements:**

- Providence Sacred Heart Medical Center GMEC and the sponsored residency/fellowship programs take seriously the responsibility of providing a high quality learning environment for residents/fellows, notably by ensuring an adequate balance between education and patient care activities within the duty hour limitations prescribed by the ACGME.
- Moonlighting activities may not fulfill any part of the required clinical experiences of the resident/fellow's training program and may not interfere with the resident/fellow's training.
- Residents/fellows are never required to engage in moonlighting. PGY-1 residents are not permitted to moonlight under any circumstance.
- Each residency/fellowship program may have its own supplemental policy on moonlighting activities, which may be more restrictive than this policy.

**Malpractice Coverage:** Professional liability coverage is not provided by Providence Sacred Heart Medical Center or Providence Medical Group as the employer for resident/fellow

moonlighting activities, as these are outside the requirements of their training program. The resident/fellow must either purchase sufficient malpractice insurance to cover their moonlighting activities or obtain written assurance from the outside employer that they will be provided with adequate professional liability insurance.

**Procedure:** Prior to the acceptance and commencement of any moonlighting activity, any resident/fellow wishing to moonlight must submit a completed and signed Moonlighting Attestation Form (program specific) to their Program Director for approval. The Program Director must provide written approval in advance of the moonlighting experience. A copy of the completed form will be placed in the resident/fellow's file.

**Resident/Fellow Responsibilities:** Upon approval of any moonlighting activity, it is the responsibility of the resident/fellow to:

1. Adhere to Clinical and Environmental Work Hours limitation set forth under the ACGME and the Providence Graduate Medical Education Committee (GMEC). Time spent moonlighting must be included in the calculation of Clinical and Environmental Work Hours done as part of the Program's Clinical and Environmental Work Hours monitoring.
2. Notify their Program Director if the facility, activities and/or hours of the moonlighting change and complete a Moonlighting Attestation Form.
3. Maintain the unrestricted medical licensure (if needed) required by their state (or the state in which the moonlighting is done) to participate in moonlighting activities.
4. Understand that participating in moonlighting activities without prior approval of his/her Program Director may be grounds for disciplinary action including dismissal from the training program.
5. Understands that moonlighting is not allowed to overlap resident duties or during times of leaves of absences from residency training.

**Program Director Responsibilities:** Once a resident/fellow has begun an approved moonlighting activity the Program Director must monitor the following:

1. The resident/fellow's performance to ensure that moonlighting activities do not interfere with the ability of the resident to meet the goals, objectives, assigned duties, and responsibilities of the educational program. Residents/fellows are cautioned not to return from moonlighting activities fatigued to the point it interferes with their educational responsibilities.
2. The resident/fellow's Clinical and Environmental Work Hours.

The Program Director may withdraw approval of the moonlighting activity at any time he/she determine that the resident/fellow is not in compliance with the conditions of approval or that it appears that the moonlighting activities are interfering with the resident/fellow's approved training program.

**Residents/Fellows Utilizing Visas:** Residents/fellows employed under a J-1 visa are strictly prohibited by law from participating in moonlighting activities. Resident/fellows employed under an H1-B and O-1 visas may be able to moonlight under specific, very limited circumstances and should contact the Providence Office of Graduate Medical Education for further information.