

## Moonlighting

### Scope

The policy applies to all residency and fellowship programs at CCHS.

### Purpose:

The Sponsoring Institution must maintain a policy on moonlighting that addresses certain ACGME-specified criteria (see below). Each training program may develop its own procedures in support of this moonlighting policy as long as residents/fellows undertake moonlighting activities only in accordance with this policy. Such procedures will be reviewed and approved by GMEC. The following applies to moonlighting by residents/fellows in all programs:

### Policy

- Residents/Fellows must not be required to engage in moonlighting activities while in the training program, and the Sponsoring Institution and the individual training programs may prohibit an eligible resident or fellow from moonlighting at any time.
- PGY-1's are not permitted to moonlight.
- GME trainees on a J-1 Visa, regardless of PGY training level, are not permitted to moonlight.
- Any eligible resident/fellow who wishes to engage in moonlighting must obtain advance written permission from the program director for such activities. The program director must give permission in writing that she/he is aware that a resident/fellow will be moonlighting and this information must be maintained in the resident/fellow's file.
- Each program must monitor the effects of moonlighting activities on a resident/fellow performance in the program, including the possibility that adverse effects may lead to withdrawal of permission to moonlight. The program director shall report to GMEC any circumstances where approval was withdrawn due to adverse performance impacted by moonlighting.
- Consistent with the Sponsoring Institution's Duty Hour Policy:
  - Moonlighting must not interfere with the ability of the resident/fellow to achieve the goals and objectives of the educational program.
  - Time spent by residents/fellows in Internal and External Moonlighting (as defined in the ACGME Glossary of Terms) must be counted towards the 80-hour Maximum Weekly Hour Limit.

- Moonlighting at Other Institutions within Alabama:
  - Residents/Fellows participating in moonlighting activities at other institutions within the State of Alabama must have an unrestricted full license to practice medicine in the State of Alabama, a current Alabama Controlled Substance Certificate (ACSC), and a personal DEA number. This means International Medical Graduates (IMG's) at the PGY-1, 2 and 3 level may not moonlight in the State of Alabama because the State of Alabama will not issue an unrestricted full license to practice medicine until successful completion of their residency training program.
  - Malpractice coverage by the Professional Liability Trust Fund (PLTF) may not be provided, therefore it is incumbent upon the resident/fellow to disclose such moonlighting (see above written permission requirement) in advance so that proper liability coverage decisions can be made.
  - The Alabama State Board of Medical Licensure, along with the DEA, have the authority to independently investigate and prosecute residents/fellows if the aforementioned requirements are not adhered to.

## Guidelines

- When moonlighting:
  - Do not use your UMC or UMC-Northport prescription number when moonlighting at other sites as your UMC number is site specific;
  - Properly complete controlled substance prescriptions to include the patient's full name, address and date of issuance;
  - Follow the accepted guidelines and policies/procedures of the site where moonlighting;
  - Be cognizant of Medicare fraud and abuse guidelines as well as state ethics requirements; and
  - Be certain you understand your individual accountability for contracts, attestations, or any other statements you sign as an independent moonlighting physician.

Related Policy: Clinical and Education Work Hours