Moonlighting APPROVED AND EFFECTIVE 10/15/18

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 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 Requirements:
- 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 Physician or H1-B Visa, regardless of PGY training level, are not permitted to moonlight at any location and are not allowed to engage in any kind of employment, clinical, or non-clinical, as enforced by the USCIS (US Citizenship and Immigration Service). Any engagement in an employment outside our residency training program may be grounds for termination and deportation per USCIS. No one holding a temporary/training medical license will be 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.
- This advanced written request for permission must include copies of the following documents as provided by the resident/fellow:
  1) For requests to moonlight in the state of Alabama:
     a. Copy of current full unrestricted medical license;
     b. Copy of current Alabama Controlled Substance Certificate (ACSC);
     c. Copy of current Certificate of Coverage for medical liability insurance for the facility you plan to moonlight;
     d. Copy of logged duty hours, including moonlighting hours, in New Innovations for the previous month;
     e. Copy of current Certificate reflecting personal DEA number;
     f. Copy of the proposed monthly schedule for the facility you plan to moonlight; and
     g. Copy of ITE scores.
  2) For requests to moonlight out of state:
     a. Verification of a full unrestricted license for the particular State must be sent to the Tuscaloosa College of Community Health Sciences Family Medicine Residency Program directly from the state board of medical examiners of that state. (This verification must be provided on yearly basis);
     b. Copy of current Certificate of Coverage for medical liability insurance for the facility you plan to moonlight. Malpractice coverage by the Professional Liability Trust Fund (PLTF) may not be provided at sites selected by resident/fellow to moonlight, 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.

c. Copy of logged duty hours, including moonlighting hours, in New Innovations for the previous month;
d. Copy of current Certificate reflecting personal DEA number;
e. Copy of the proposed monthly schedule for the facility you plan to moonlight; and
f. Copy of ITE scores.

• Moonlighting is prohibited during official working hours, during night call, weekend call or any holiday call assigned to the trainee, unless the trainee has approved annual leave coinciding with these assignments and trainee declared moonlighting activities per this Policy on the annual leave request form.

• Moonlighting is prohibited while on sick or administrative leave; no exceptions.

• Trainees must maintain 8 hours duty-free between scheduled shifts inclusive of moonlighting.

• Application for moonlighting, and obtaining written permission, must be submitted monthly along with a copy of the above documents. Resident/fellow must attach actual documents to moonlighting request every month. Statement “documents previously on file” will not be acceptable.

• It is the sole responsibility of the resident/fellow to obtain his/her own full unrestricted state license, state controlled substance license, and personal DEA number before submitting the request of moonlighting.

• Moonlighting hours must be logged in New Innovations within 1 week of moonlighting. This should be confirmed prior to approving the next moonlighting request.

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

• Residents and fellows are discouraged from moonlighting in chronic pain management or weight loss clinics.

Program Guidelines

• 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.

• These above requirements apply to any sort of employment requiring a medical license including but not limited to; outpatient medicine, inpatient medicine, emergency medicine, urgent care, telemedicine, medical chart review, wellness physical exam, sports physical, and
any patient-involved activity, that may happen beyond the confines of the residency program approved practice site(s).

- Resident/Fellow must be in good academic standing before moonlighting as determined by the program director.
- The program director must give permission in writing that he/she 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 Clinical and Educational Work (Duty) Hours Policy:
  - Moonlighting must not interfere with the ability of the resident/fellow to achieve the goals and objectives of the educational program, and it must not interfere with the resident/fellow’s fitness for work nor compromise patient safety.
  - 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, thus the requirement to log all hours in New Innovations on a timely basis.
- This policy will be communicated to Tuscaloosa College of Community Health Sciences Family Medicine Residents during Intern Orientation, Upper Level Orientation, after obtaining full unrestricted licensure, biannually by chief residents during resident forums and upon any modification or updating of the policy.
- Residents must sign and acknowledge this policy before starting any moonlighting activity, and the signed copy will be retained in the resident’s file in the residency office.

Consequences:
Any violation of this Policy by a trainee will result in immediate revocation of previously approved moonlighting as well as prohibiting any future moonlighting while enrolled in the training program.

Related Policy: Clinical and Educational Work Hours Policy