



**THE GEORGE
WASHINGTON
UNIVERSITY**
WASHINGTON, DC

Responsible University Official: Program Director
Responsible Office: SMHS Department of Medicine
Most recent revision: November 18, 2015

Internal Medicine Residency Program Moonlighting Policy

Policy Statement

All programs must create and maintain a Moonlighting Policy according to stipulations of the ACGME.

Who Needs to Know This Policy

The Office of Graduate Medical Education (GME) and the faculty, residents, fellows and affiliates of the Department of Medicine at the GW SMHS.

Policy Contact

Program Director

Who Approved This Policy

Graduate Medical Education Committee (GMEC)

History/Revision Dates

Created: February 21, 2014
Amended: November 18, 2015

Policy

Moonlighting must not interfere with the ability of the trainee to achieve the goals and objectives of the educational program. Trainees are never required to moonlight.

I. Permission to Moonlight:

All institutional requirements, program requirements, documentations, verifications and licensing must be met and up-to-date in order to begin or continue any moonlighting activities.

Permission to moonlight must be requested of the program director in advance using the MedHub system. Copies of licenses, DEA registration, DCCS registration, and proof of malpractice coverage (for external moonlighting) must be attached to the request. Once granted, such permission shall not extend beyond the current academic year. Permission to moonlight must be separately requested of and granted by the Program Director each academic year regardless of when it was last granted.

- PGY-1 Residents are not eligible to moonlight
- PGY-2 Residents may only be permitted to moonlight during the second half of the academic year, after they have passed USMLE Step III and have completed all licensing requirements.
- PGY-3 residents and fellows may be permitted to moonlight after they have passed Step III and have completed all licensing requirements.
- Any resident holding a J-1 visa, by virtue of INS regulations and ECFMG sponsorship, is not permitted to accept work or receive income in any capacity other than that of a resident as specified on the DS 2019 issued by the ECFMG.

Moonlighting is permissible only at the discretion of the program director, provided that such activity does not interfere with the trainee's performance in the residency or fellowship training program. **Moonlighting is a privilege and not a right. Permission to moonlight may be withdrawn by the program director at any time.**

II. Duty hours and timing of moonlighting shifts

Time spent by residents in internal and external moonlighting must be counted towards the 80-hour maximum weekly limit on duty hours. Other ACGME duty hour requirements do not apply, however patient safety requires that trainees prevent impairment caused by fatigue.

Residents are NEVER permitted to moonlight:

- While on "disaster"
- The night before any assigned ward day shift (e.g. GW/VA/Fairfax/NIH wards, blue/red teams, gold team)
- On any day or night during an ICU rotation (or the night before the ICU rotation begins)
- If doing so puts them in violation of the 80-hour weekly duty hour limit
- Two moonlighting shifts in a row if they have an assigned work shift in between

Any resident who works moonlighting shift in violation of the above may have moonlighting privileges revoked for a minimum of 3 months and may receive a professionalism letter of deficiency from the Program Director.

All residents who moonlight must log duty hours in MedHub for the week of every moonlighting shift, including moonlighting shifts AND required program shifts.

III. Interference with clinical or educational activities

Residents must attend all residency or fellowship program clinical and educational activities to which they are assigned. It is never acceptable to miss any program duties due to conflicts created by moonlighting. Moonlighting residents are NEVER permitted to leave work early before a moonlighting shift or the following day, even if assigned to elective or conference/didactic time.

Any resident who misses assigned residency activities due to moonlighting may have moonlighting privileges revoked for a minimum of 3 months and may receive a professionalism letter of deficiency from the Program Director.

Trainees whose level of fatigue interferes with their program duties may have moonlighting privileges revoked. Specifically, any resident who appears too fatigued for safe patient care may be sent home by the chief residents or program leadership. *Any resident sent home due to fatigue will be assigned to disaster for the next available Saturday and Sunday, or for one previously scheduled vacation day.*

IV. Letters of deficiency

A trainee who has received a letter of deficiency is prohibited from engaging in any moonlighting activities until the deficiency has been satisfactorily remediated and explicitly approved by the program director.

V. Licensing

Trainees will not be reimbursed for licenses obtained only for moonlighting purposes.

Trainees must obtain their own DEA registration and DC Controlled Substance registration before approval to moonlight may be granted.

Trainees must obtain a full unrestricted Washington, DC medical license before approval to moonlight may be granted. Trainees may not moonlight while their application for a DC license is pending and may not moonlight with a training license. Trainees must obtain the appropriate state medical license before participating in moonlighting activities outside of Washington, DC.

VI. Moonlighting Outside of DC

*Please note: DC law requires residents to have a full, unrestricted DC medical license before you can have a full license in any other state. **This means that even if you want to moonlight in Virginia, you MUST obtain a full license in DC** before (or at the same time as) your Virginia license. **Failure to do so, according to DC law, means that you will be suspended immediately from participation in the residency program until you obtain the full DC license.***

VII. Liability Insurance

While engaging in moonlighting activities, the resident is not acting as an employee or agent of GWU.

Professional liability coverage is not provided by GWU for moonlighting activities. It is the responsibility of the resident to obtain professional liability insurance coverage for all moonlighting outside of GWU Hospital.

The MFA will provide malpractice coverage for residents participating in internal Moonlighting at The George Washington University Hospital provided they are in compliance with all of the foregoing requirements.

Residents who request approval for moonlighting outside GW must attach proof of malpractice to the moonlighting request.