



**THE GEORGE
WASHINGTON
UNIVERSITY**
WASHINGTON, DC

Responsible University Official: Associate Dean for Graduate
Medical Education, DIO
Responsible Office: SMHS Office of GME
Most recent revision: May 2024

MOONLIGHTING POLICY

Policy Statement

To outline the circumstances under and the procedure by which a resident or fellow may engage in moonlighting outside of the scope of clinical and educational activities of the training programs sponsored by The George Washington University (GWU).

Who Needs to Know This Policy

All Accreditation Council for Graduate Medical Education (ACGME)-accredited residency and fellowship programs sponsored by the GW School of Medicine and Health Sciences (GW SMHS)

Policy Contact

Associate Dean for Graduate Medical Education, DIO

Who Approved This Policy

Graduate Medical Education Committee (GMEC)

History/Revision Dates

Effective: November 19, 2001

Reviewed and Approved by the GMEC: December 17, 2001

Revised, reviewed, and approved by the GMEC: July 15, 2002

Revised, reviewed, and approved by the GMEC: January 25, 2010

Revised, reviewed, and approved by the GMEC: May 16, 2011

Revised, reviewed, and approved by the GMEC: August 17, 2015

Revised, reviewed, and approved by the GMEC: May 20, 2024

Definitions

Resident

Resident refers to all interns and residents participating in ACGME-accredited post-graduate training programs sponsored by GWU.

Fellow

Fellow refers to trainees in an ACGME accredited post graduate training fellowship program sponsored by GWU.

Post-Graduate Training Program

Post-graduate training program refers to an ACGME-accredited internship, residency or fellowship training program sponsored by GWU.

Moonlighting

Moonlighting refers to any and all clinical activities outside of the clinical and educational requirements of the post-graduate training program, in which the resident performs duties as a fully-licensed physician and receives direct financial remuneration. GWU recognizes the following types of moonlighting:

Internal Moonlighting

Internal moonlighting refers to optional compensated medically-related clinical activities outside the scope of the educational program based at the GWU Hospital in which the resident performs duties as a licensed physician under the direct or indirect supervision (see supervision policy) of a credentialed GWU attending physician.

External Moonlighting

External moonlighting refers to voluntary, compensated, medically-related work performed outside the institution where the resident or fellow is in training or at any of its related participating sites.

Independent Practice

If allowed by the ACGME Specialty Requirement, a fellowship program may assign fellows to engage in the independent practice of their core specialty during their fellowship program, to maintain their primary specialty Board skills. This is distinctly separate from moonlighting.

Responsibilities/Requirements

Program Directors

1. Residents and fellows must not be required to moonlight. Moonlighting is permissible, based upon the discretion of the Program Director, provided that such activity does not interfere with the resident's performance in their post-graduate training program. Permission to moonlight may be withdrawn by the program director at any time. Program directors who wish to prohibit all residents and fellows from moonlighting may do so provided that they notify the GME Office in writing of any such policy and make the prohibition known to all applicants to the post-graduate training program and to all residents and fellows in the program on an annual basis.
2. Program directors must approve all requests for moonlighting on the MedHub system.
3. Program directors must determine if the requests for moonlighting are in compliance with institutional and ACGME duty hour policies. Specifically,

program directors must monitor all duty hours, including moonlighting, closely on the MedHub system and address any duty hour violations immediately. Time spent by residents and fellows in Internal and External Moonlighting must be counted towards the 80-hour Maximum Weekly Hour Limit and should not exceed 12 hours a week at all sites.

4. Program directors must provide, in their annual program report to the GME Office, a summary of the moonlighting activity of all residents and fellows in the training program.

Residents and Fellows

1. Residents and Fellows must have approval by the program director and the Associate Dean for GME to be able to participate in any moonlighting activity. Residents and fellows may not begin moonlighting prior to receiving approval from the Associate Dean for GME.
2. Moonlighting activities are prohibited if they are inconsistent with the principles of the trainees' educational experience.
3. Requests for moonlighting approval must be submitted on the MedHub system.
 - Approval is time-limited, expires June 30 each year, and a new request must be submitted and approved at the beginning of the academic year.
 - Requests may not be backdated.
 - Request must have copies of the appropriate State medical license, Controlled Substance (CS) license, and Federal DEA attached.
 - CS and DEA licenses may not be required for internal moonlighting if the position does not require prescribing medications; program director attestation must be attached.
 - External moonlighting requests must have proof of malpractice coverage attached.
 - Total moonlighting hours should not exceed 12 hours per week at all sites.
4. License Requirements:
 - Residents must obtain an unrestricted D.C. medical license before participating in all moonlighting activities in any facility in the District of Columbia. Residents may not moonlight with a training license or while their application for a D.C. license is "pending." Residents will not be reimbursed for licenses obtained only for moonlighting purposes.
 - The appropriate State medical license, CS license, and Federal DEA license must be obtained for moonlighting outside the District of Columbia. Residents and Fellows are responsible for the cost of these licenses.
 - Residents with an MTL I (A) who obtain a full unrestricted license in another State, and who qualify for a full DC medical license, may continue on the DC MTL I(A) for only one additional year of post-graduate training; for subsequent years, they must obtain a full DC medical license to continue in the program, per DC Municipal Regulation 4611, published July 14, 2023.
 - The temporary DEA and CS numbers issued by the GME Office for use at GWU may only be used within the context of the training program.
5. Reporting requirements:
 - Time spent by residents and fellows in Internal and External Moonlighting must be counted towards the 80-hour maximum weekly hour limit.
 - All moonlighting hours (internal and external) must be reported on the duty hours timesheet on the MedHub system. Failure to report moonlighting

- hours or non-compliance with ACGME duty hour rules will result in withdrawal of permission to moonlight.
6. If a fellowship program permits their fellows to utilize the independent practice option to maintain their primary specialty Board skills during the fellowship, the fellow must not exceed 20 percent of their time per week (up to 16 hours per week) in pursuit of this independent practice. Moonlighting is separate from the independent practice option. Fellows who work under the independent practice option noted herein are similarly limited to no more than 12 hours a week doing moonlighting. The total aggregate of independent practice hours and moonlighting hours must not exceed 28 hours a week at all sites (16 hours independent practice and 12 hours moonlighting).

Liability Insurance

1. The MFA will provide malpractice coverage for residents and fellows participating in internal moonlighting at The George Washington University Hospital provided they are following all of the foregoing requirements.
2. While engaging in external moonlighting activities, the resident or fellow is not acting as an employee or agent of GWU.
3. Professional liability coverage is not provided by GWU for external moonlighting activities. It is the responsibility of the resident or fellow to obtain professional liability insurance coverage for all moonlighting outside of the GWU Hospital.
4. Residents and fellows who request approval for external moonlighting must attach proof of malpractice to the moonlighting request.

Restrictions

1. PGY 1 Residents are not permitted to moonlight.
2. Any resident or fellow 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 or fellow as specified on the DS 2019 issued by the ECFMG.
3. Military residents and fellows may not participate in Internal Moonlighting in accordance with military policy which prohibits the resident or fellow from receiving any payment or compensation other than his/her pay and allowances from the military.
4. Residents and fellows employed by another institution and detailed to GWU are not eligible to participate in internal moonlighting,
5. Residents and fellows must be in good standing within their program to engage in moonlighting activities. Residents and fellows who have been issued a Letter of Deficiency or are on administrative leave pending appeal of a reportable action may not moonlight.
6. Residents and fellows must be in compliance with all annual onboarding requirements, including training modules and health clearances, before requesting approval for moonlighting.