



**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:

MOONLIGHTING POLICY

Policy Statement

To outline the circumstances under and the procedure by which a resident may engage in moonlighting outside of the scope of clinical and educational activities of the residency 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 (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

Definitions

Resident

Resident refers to all interns, residents and fellows participating in ACGME-accredited post-graduate training programs 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 clinical activities based at the GWU Hospital.

External Moonlighting

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

Responsibilities/Requirements

Program Directors

1. Residents 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 his or her 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 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 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 duty hours closely and address any duty hour violations immediately. Time spent by residents in Internal and External Moonlighting must be counted towards the 80-hour Maximum Weekly Hour Limit.
4. Program directors must provide, in their annual program report to the GME Office, a summary of the moonlighting activity of all residents in the training program.

Residents

1. Residents must be approved by the program director and the Associate Dean for GME prior to participating in any moonlighting activity.
2. Requests for moonlighting approval must be submitted on the MedHub system.
3. Approval for moonlighting is time-limited and applies to the current academic year only.
4. Residents must obtain a full D.C. medical license before participating in moonlighting. Residents may not moonlight while their application for a D.C. license is “pending” and may not moonlight with a training license. Residents will not be reimbursed for licenses obtained only for moonlighting purposes.
5. Residents must obtain the appropriate State medical license before participating in moonlighting activities outside the District of Columbia. In addition, in keeping with D.C. licensure rules, the resident must obtain a full D.C. license.
6. Residents must obtain a DEA registration and DC Controlled Substance registration. The temporary DEA number and the DC Controlled Substance number issued by the GME Office for use at GWU is only to be used within the residency program.
7. Residents must attach a copy of the medical license, DEA registration, and Controlled Substance registration, if applicable, to the moonlighting request.
8. Time spent by residents in Internal and External Moonlighting must be counted towards the 80-hour Maximum Weekly Hour Limit. Residents participating in moonlighting activities must report all duty hours on the MedHub system; failure to report duty hours or non-compliance with ACGME duty hour rules will result in withdrawal of permission to moonlight.

Liability Insurance

1. While engaging in moonlighting activities, the resident is not acting as an employee or agent of GWU.
2. 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 GWU Hospital.
3. 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.
4. Residents who request approval for moonlighting outside GW must attach proof of malpractice to the moonlighting request.

Restrictions

1. PGY 1 Residents are not permitted to moonlight.
2. 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.
3. Military residents may not participate in Internal Moonlighting in accordance with military policy which prohibits the resident from receiving any payment or compensation other than his/her pay and allowances from the military.
4. Residents employed by another institution and detailed to GWU are not eligible to participate in Internal Moonlighting if the agreement with their home

institution prohibits the resident from receiving any compensation in any form from the training institution.

5. Residents must be in good standing in their program to engage in moonlighting activities.