
SUBJECT: Graduate Medical Education Trainee Moonlighting

POLICY: Moonlighting

DATE EFFECTIVE: April 22, 2005

PAGE: 1 of 3

I. PURPOSE:

This policy is designed to establish an outline of the circumstances under and the procedure by which a trainee may engage in moonlighting outside of the clinical and educational requirements of the GME training programs sponsored by Children's National Hospital (CH).

II. POLICY SCOPE:

All Accreditation Council for Graduate Medical Education (ACGME) accredited, and non-ACGME residency and fellowship programs sponsored by Children's National Hospital.

III. DEFINITIONS:

Trainee

Trainee refers to all interns, residents and fellows participating in ACGME-accredited training programs sponsored by CH.

Training Program

Training program or program refers to an ACGME-accredited internship, residency or fellowship training program sponsored by CH.

Moonlighting

Moonlighting refers to any and all clinical activities external to the clinical and educational requirements of the training program, in which the Trainee performs duties either under routine supervision (Resident) or as a fully licensed physician (Fellows) and receives direct financial remuneration. Moonlighting activities are separately identifiable from those activities that are required as part of the training program. Moonlighting services are identifiable physician services, the nature of which require performance by a physician and contribute to the diagnosis or management of the patient's condition.

Internal Moonlighting

Internal moonlighting refers to optional, compensated clinical services performed at CH.

External Moonlighting

External moonlighting refers to optional, compensated, clinical services performed outside the institution where the Trainee is in training or outside of any of its related participating sites.

IV. RESPONSIBILITIES/REQUIREMENTS:

Program Directors

1. Trainees 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 trainee's performance in his or her training program. Permission to moonlight may be withdrawn by the program director at any time. Program directors who wish to prohibit all trainees 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 training program and to all trainees in the program on an annual basis.

2. Program directors must track all moonlighting activity on the MedHub system.
3. Program directors must determine if the requests for moonlighting are in compliance with institutional and ACGME work hour policies. Specifically, program directors must monitor work hours closely and address any work hour violations immediately. Time spent by trainees 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 trainees in the training program.

Trainees

1. Trainees must be credentialed by the Children's National Medical Staff Office before participating in internal moonlighting activities as a fully licensed physician.
2. Trainees must be approved by the program director prior to participating in any moonlighting activity. Approval for moonlighting must be done in-writing, is time-limited, and applies to the current academic year only.
3. Residents may moonlight internally by performing patient care activities designated as appropriate for their PGY level of training under routine supervision. A Resident cannot practice independently unless credentialed by the Children's National Medical Staff office.
4. Residents must obtain a full D.C. medical license before participating in external moonlighting. Residents may not moonlight externally with a training license while their application for a D.C. license is "pending". Residents will not be reimbursed for licenses obtained only for moonlighting purposes.
5. Trainees must obtain the appropriate State medical license before participating in external moonlighting activities and moonlighting activities outside the District of Columbia. In addition, in keeping with D.C. licensure rules, any Trainee with a State medical license outside of D.C. must obtain a full D.C. license.
6. Trainees with a State medical license 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 CH is only to be used for internal moonlighting by residents.
7. Time spent by trainees in Internal and External Moonlighting must be counted towards the 80-hour Maximum Weekly Hour Limit. Trainees participating in moonlighting activities must report all work hours on the MedHub system. Failure to report work hours or non-compliance with ACGME work hour rules will result in withdrawal of permission to moonlight.

V. LIABILITY INSURANCE:

1. While engaging in external moonlighting activities, the Trainee is not acting as an employee or agent of CH.
2. Professional liability coverage is not provided by CH for external moonlighting activities. It is the responsibility of the Trainee to obtain professional liability insurance coverage for all moonlighting outside CH.

3. Trainees who request approval for moonlighting outside CH must attach proof of malpractice to the moonlighting request.

VI. RESTRICTIONS:

1. PGY-1 Residents are not permitted to moonlight.
2. Trainees with J-1 visas are not permitted to engage in any moonlighting activities. This is per federal USCIS regulations prohibiting trainees on J-1 visas with ECFMG sponsorship from working or receiving compensation for any activity outside the approved training program, including internal and external moonlighting.
3. Trainees with H-1B visas are permitted to engage in internal moonlighting activities so long as these moonlighting activities are the same as those stipulated within their H-1B Letter of Support. This should be confirmed with the Program Director prior to moonlighting. Trainees with H-1B visas are not permitted to engage in external moonlighting activities.
4. Military trainees may not participate in Internal Moonlighting in accordance with military policy which prohibits the trainee from receiving any payment or compensation other than his/her pay and allowances from the military.
5. Trainees employed by another institution and detailed to CH are not eligible to participate in Internal Moonlighting if the agreement with their home institution prohibits the trainee from receiving any compensation in any form from the training institution.
6. Trainees must be in good standing in their program to engage in moonlighting activities.

VII. APPROVAL
Approved by:



DIO/Vice Chair, Medical Education

9/13/2023

Date

VIII. REVIEW OR REVISION DATE

Approved by the GMEC: April 22, 2005
Modified and Approved by the GMEC: February 13, 2008 Modified and
Approved by the GMEC: September 21, 2011 Modified and Approved by
the GMEC: January 20, 2017 Modified and Approved by the GMEC:
September 9, 2020 Modified and Approved by the GMEC: July 14, 2021
Reviewed and Approved by the GMEC: June 15, 2022
Modified and Approved by GMEC: September 13, 2023