



MOONLIGHTING

The primary activity of trainees enrolled in a graduate medical education (GME) program is education. Nationwide Children's Hospital (NCH) also acknowledges that trainees may occasionally seek to moonlight for a variety of reasons. Moonlighting must be limited in scope and must not interfere with the core education of the residency program.

For purposes of this policy, moonlighting refers to voluntary, compensated, medically-related work performed by a trainee who is enrolled in a GME or Dental education program. NCH has defined 4 categories of moonlighting (see Moonlighting and Extended Resident Service procedure):

1. Extended Resident Service – Voluntary, compensated, medically related work that is performed by a resident or fellow in an NCH GME or Dental Education program who is functioning as a supervised trainee and is paid by NCH as an NCH employee.
2. Extended Resident Service Rotator – Voluntary, compensated, medically related work that is performed at NCH or an NCH site by a resident or fellow in a non-NCH GME or Dental Education program who is functioning as a supervised trainee and is paid by NCH as an NCH employee
3. Moonlighting as Independent Practitioner – Voluntary, compensated, medically related work that is performed at an NCH outpatient site by an advanced resident or fellow in an NCH GME or Dental Education program who is credentialed by NCH Medical Staff to function as an independent practitioner and is paid by NCH as an NCH employee
4. External Moonlighting – Voluntary, compensated medically related work that is performed at a Non-NCH site by a resident or fellow in an NCH GME or Dental Education program who is paid by an outside institution.

All NCH sponsored programs that permit moonlighting by their trainees must abide by the following conditions:

- Trainees must not be required to moonlight.
- PGY1 Residents enrolled in ACGME accredited programs may not moonlight. PGY1 Residents who have an unrestricted Ohio License and are enrolled in a non ACGME accredited program and have completed 6 months of training may moonlight with the approval of the Program Director.
- Trainees on a J-1 visa may not moonlight

- Prospective, written permission from the trainee's Program Director is required each time the trainee moonlights. Permission must be maintained in the trainee's file.
- Only trainees who have a permanent, unrestricted Ohio medical license may moonlight. Trainees with an Ohio training certificate medical license may not moonlight.
- Trainees may not moonlight while on maternity, paternity, or family medical leave.
- Services provided by trainees while moonlighting must be commensurate with their level of training and expertise. Trainees may not moonlight if the requisite clinical services are beyond the scope of their current level of training and expertise. It is the responsibility of the moonlighting trainee to refrain from performing clinical services beyond the scope of his or her training.
- The Program Director will monitor the trainee's performance in the GME or Dental Education program. If the Program Director determines that the trainee's performance is adversely affected by moonlighting activities, permission to moonlight may be withdrawn or refused. Denial of moonlighting is not considered an adverse action and is not eligible for due process appeal.
- All moonlighting hours, internal and external moonlighting, must be counted in trainees' 80-hour weekly limit on duty hours. None of the other numeric standards (e.g., 10 hours rest period, one in seven free of all program responsibilities) apply. The expectation is that the trainee's total duty hours will not exceed what is advisable for patient safety and trainee learning and well-being.
- Trainees' first responsibility is to fulfill the requirements of their educational program. Trainees seeking to moonlight must assure the Program Director that their total duty hours (in their GME/Dental program *and* requested moonlighting) do not exceed the duty hour limits or their ability to perform their assigned program duties. If moonlighting will result in exceeding these limits, the trainee must curtail moonlighting.
- Trainees must abide by all regulatory and institutional requirements while moonlighting, including but not limited to Corporate Compliance, HIPAA, and billing.
- Liability coverage must be stipulated for all moonlighting. Trainees are covered for approved moonlighting within NCH. If a trainee is moonlighting in another setting, liability coverage must be provided by the other organization or be secured privately by the trainee. The trainee must provide the Program Director with written documentation of liability coverage in non-NCH settings.
- It is the responsibility of the institution or practice employing a moonlighting trainee to assure that the trainee has the license (including an individual DEA), credentials, and privileges to perform the expected services.

- Trainees who are moonlighting at a non-NCH facility may not wear anything or otherwise identify themselves as trainees or employees of NCH.
- Trainees moonlighting as independent practitioners in an NCH outpatient setting must be credentialed by the NCH Medical Staff and have a personal DEA number.
- In rare instances, for example during disasters or other periods temporarily affecting the health of unusually large numbers of children, the NCH Medical Staff, at its sole discretion, may review fellows' credentials and grant them temporary privileges as independent practitioners.

All non NCH residents and fellows moonlighting at NCH (Extended Resident Service Rotator) must abide by the following conditions:

- Trainee must have a permanent, unrestricted Ohio medical license.
- Trainees on a J-1 visa or H1-B visa may not moonlight
- Trainee must complete NCH employment process including drug screen and background check

Violations of this policy may terminate the trainee's privilege to moonlight.

Approved by GME Committee: 6/27/01; 5/15/02; 12/2/03, 04/18/2007, 10/29/2010, 1/18/2012