



GME Moonlighting Policy

Definitions:

Moonlighting: voluntary, compensated, medically related work performed outside the educational requirements of the residents/fellow training program.

Internal Moonlighting: when the work is performed within the primary training site and the clinical work is related to the training program. Internal moonlighting is most often supervised. An individual cannot pay a resident/fellow for moonlighting.

External Moonlighting: when work is performed external to the primary training site, this may include WVU Medicine facilities (i.e., UHC, Uniontown, Mon General, etc.). External moonlighting is considered independent and unsupervised and requires a *valid and unrestricted* WV medical license, an independent DEA number, and malpractice insurance.

Supervised Moonlighting: when internal moonlighting is supervised by a physician credentialed to practice independently by the primary training site.

Independent Moonlighting: when a resident or fellow moonlights without supervision from a credentialed physician of the primary training site. Independent moonlighting requires a *valid and unrestricted* WV medical license, an independent DEA number, and malpractice insurance.

Policy: All programs must have a program specific moonlighting policy that specifies what types of activities will and will not constitute moonlighting. **Programs are not required to provide moonlighting opportunities.** No resident/fellow is required to moonlight as part of their training program. Programs must monitor the effect of moonlighting activities on a resident's/fellow's performance in the program, including adverse effects that may lead to withdrawal of permission to moonlight. Residents or fellows who seek and are granted written permission by their program director to moonlight in any capacity must satisfy the following GME requirements to moonlight:

- PGY1 residents are not permitted to moonlight.
- Obtain prior written approval from their program director. The resident/fellow must be progressing satisfactory academically and clinically as determined by their program director and not be on active remediation, suspension, or probation.
- Take and **PASS**, either USMLE Step 3 or COMLEX Step 3 by the end of their first postgraduate year (PGY-1).
- Moonlighting hours must be reported in e-value and resident/fellow must be compliant with all ACGME work hour requirements.

- Internal, Supervised Moonlighting:
 - Resident/fellow must have a valid WV training permit.
 - J-1 visa holders are permitted to participate in internal, supervised moonlighting if the training program completes and submits the request for approval to Inthealth <https://www.ecfm.org/evsp/supplemental-clinical-activity-attestation.pdf> A copy of this form must be kept in the resident's file, submitted to the central GME office, and WVU Medicine Compliance. https://wvu.qualtrics.com/jfe/form/SV_3V5cl1jYy1zcnwW must be completed and submitted to the WVU business office.
 - Current malpractice coverage will apply if the resident is practicing in the area of clinical work related to their training program.
- External Moonlighting:
 - Resident/fellow must have a **valid and unrestricted** WV medical license.
 - Resident/fellow must obtain malpractice coverage for external moonlighting activities.
 - Hospital related DEA number may not be used for external moonlighting.
 - J-1 visa holders **are not** permitted to participate in external moonlighting.
- Internal, Independent Moonlighting:
 - This moonlighting generally occurs in fellowship programs where a fellow has completed a core residency and is moonlighting in the primary specialty while training in a sub-specialty.
 - Requires credentialing and **valid, unrestricted** WV medical license.
 - J-1 visa holders **are not** permitted to participate in internal, independent moonlighting.

ACGME Institutional Requirements

4.11.a. Moonlighting

The Sponsoring Institution must maintain a policy on moonlighting that includes the following:

4.11.a.1. residents/fellows must not be required to engage in moonlighting; (Core)

4.11.a.2. residents/fellows must have written permission from their program director to moonlight; (Core)

4.11.a.3. an ACGME-accredited program will monitor the effect of moonlighting activities on a resident's/fellow's performance in the program, including that adverse effects may lead to withdrawal of permission to moonlight; and, (Core)

4.11.a.4. the Sponsoring Institution or individual ACGME-accredited programs may prohibit moonlighting by residents/fellows. (Core)

Approved by GMEC: