

Departmental Policy Title	Moonlighting Policy - GME	Policy ID	11310
Keywords	moonlighting, privileges, DEA License, J-1, second, job		
Department	Graduate Medical Education		

I. Purpose of Policy

The policy addresses the Accreditation Council for Graduate Medical Education (ACGME) Requirement that the Sponsoring Institution maintain a policy regarding professional activities outside the required educational program.

II. Policy Scope

This policy applies to all ACGME-accredited residency and fellowship programs at Dartmouth Hitchcock (DH).

III. Definitions

External moonlighting: Any moonlighting that occurs outside of DH, inclusive of Participating Hospital Affiliates.

Internal moonlighting: Ed, Ambulatory, and Inpatient Setting (Unsupervised): Any moonlighting that occurs within DH [Mary Hitchcock Memorial Hospital (MHMH) or Dartmouth-Hitchcock Clinic (DHC)] where the Resident is performing as an independent practitioner outside of their area of training in an outpatient setting.

Moonlighting: Voluntary, compensated, medically-related work that is not part of the required educational program.

Resident: Any physician in an accredited graduate medical education program, including interns, residents, and fellows.

IV. Policy Statement

General:

- DH neither encourages nor discourages moonlighting. Moonlighting is strictly voluntary.
- Individual ACGME-accredited programs may prohibit moonlighting by a Resident.

- A Resident participating in moonlighting must first complete a Moonlighting Request form in the Residency Management System (MedHub) to obtain approval and signature by the Program Director and the Director of GME prior to undertaking such activity.
- All moonlighting approvals:
 - Remain in force for the current academic year unless terminated by the Program Director.
 - Automatically expire on June 30 of a given academic year.
 - For the next academic year, prior moonlighting approvals must be processed and approved before undertaking additional moonlighting activities.
- All moonlighting activities, internal and external, must be:
 - Reported by the Resident as work hours within the Residency Management System using the appropriate identifier.
 - Counted toward the 80-hour weekly limit on duty hours.
- Restrictions include the following:
 - PGY-1 and PGY- 2 Residents may not moonlight in New Hampshire due to licensing restrictions by the state.
 - Residents employed under a J-1 visa are strictly prohibited by law from participating in moonlighting activities.
 - Residents employed under an H1-B visa may be able to moonlight under specific, very limited circumstances.
- Violation of these moonlighting rules and procedures by a Resident may lead to disciplinary action.

Program Director Responsibilities:

- Approve Resident moonlighting request in the Residency Management System.
- Monitor moonlighting activities on an ongoing basis.
- Ensure moonlighting activities do not interfere with the ability of a Resident to meet the goals, objectives, assigned duties, and responsibilities of the educational program.
- Withdraw permission to moonlight if, at any time, moonlighting activities are seen as producing adverse effects on the Resident's performance in the program.

Resident Responsibilities:

- Remain in good standing within their program; and
- Complete a Moonlighting Request in the Residency Management System to obtain approval and sign-off by their Program Director and the Director of GME prior to undertaking any moonlighting activity.
- Apply for and obtain a permanent license to practice medicine, if required.
- Apply for and obtain, if required, an individual Federal DEA number.
- Complete credentialing packet from Medical Staff Office (MSO) for moonlighting, if required.

GME Office Responsibilities:

- Approve Resident moonlighting request in the Residency Management System.
- Maintain a completed Moonlighting Request form in the Residency Management System.

Moonlighting Categories:

- **Internal Moonlighting – ED, Ambulatory, and Inpatient Setting (Unsupervised)** is defined as any moonlighting that occurs within DH (Mary Hitchcock Memorial Hospital [MHMH] or Dartmouth-Hitchcock Clinic [DHC]) where the resident is performing as an independent practitioner outside of his or her area of training in an outpatient setting.
 - Full New Hampshire licensure is required
 - Individual DEA number is required.
 - Appropriate credentialing as decided by DH Medical Staff Office.
 - DH may bill for moonlighting services rendered in the outpatient department or the Emergency Department subject to the following criteria:
 - The services are identifiable physician services that are otherwise eligible for payment.
 - The resident is fully licensed to practice medicine in the state.
 - The services performed can be separately identified from those services that are required as part of the approved GME program.
 - The hiring DH department is responsible for the accuracy of billing related to moonlighting in the ED/Ambulatory setting.
- **External Moonlighting** is defined as any moonlighting that occurs outside of DH, inclusive of Professional Hospital Affiliates.
 - A Resident moonlighting outside of DH (external moonlighting) are not covered by the DH Professional Liability Insurance Policy and must make certain that the outside employer provides adequate professional liability coverage. It is the resident’s responsibility to determine what level of coverage is “adequate.”
 - The Resident is responsible for any state licensing and Medical Staff Office requirements.

V. References

Optional Extra Shifts within a Training Program – GME (policy 25613)

GME Program Directors at DH may identify additional shifts that are determined to be within the scope of the GME training program – but are not a required part of the program – for which extra payment may be offered. These voluntary “Extra Shifts” must be specifically designated as such by the Program Director. “Extra Shifts” are intended to address occasional, often unanticipated need for expanded Resident involvement in certain clinical activities. This may occur for a variety of reasons, including for example, covering for a colleague on an extended medical leave or responding to a surge of clinical volume.

Responsible Owner:	Graduate Medical Education (GME)	Contact(s):	Karen Miller
Approved By:	Office of Policy Support - Organizational Policies Only; Covey, Dwayna; Huntington, Jonathan	Version #	2
Current Approval Date:	03/03/2025	Old Document ID:	
Date Policy to go into Effect:	03/03/2025		
Related Polices & Procedures:	Optional Extra Shifts withing a Training Program - GME		
Related Job Aids:			