

Policy on Moonlighting and Extra Call for Pay

Effective 12/13/2019

Reaffirmed by GMEC 04/14/2023

Previous 07/08/2016

The term "moonlighting" refers to clinical work outside of the activities of the training program for the purpose of providing medical services, regardless of whether it is performed at one of the McGaw affiliated hospitals or at another non-affiliated institution. A moonlighting trainee functions in the role of a faculty / attending. Moonlighting is optional, and trainees cannot be required to participate. Moonlighting must not interfere with a trainee's ability to achieve the goals and objectives of their training program and requires the trainee to have a valid permanent medical license in the state in which moonlighting occurs. Moonlighting without a permanent medical license constitutes the unlicensed practice of medicine.

Some training programs offer pay for taking additional call (extra call for pay). A trainee performing extra call for pay functions in the role of a McGaw trainee with faculty supervision. Extra call for pay must occur at a McGaw training site. When such an opportunity is offered by a program, participation by trainees is voluntary and shall not be required. When a trainee is taking additional call for pay within their training program, the same supervision policy applies as when the trainee is taking regular training call. The time spent taking such additional call must be included in calculating total Clinical Experience and Education (CEE) hours.

McGaw and its affiliated hospitals are not responsible for any professional activities in which trainees participate outside the scope of the training program to which they are appointed. Neither professional liability nor workers' compensation insurance provided by McGaw covers these activities. This includes any moonlighting occurring at non-McGaw sites.

The desire to moonlight / extra call for pay must be discussed with the trainee's Program Director and may only occur with written permission. The written permission will be maintained in the trainee's training file. The Program Director must monitor the trainee's performance to ensure the activities are not excessive, do not impair the trainee's ability to carry out assigned McGaw responsibilities, do not violate any CEE hour requirements, or create excessive fatigue. The approval to moonlight or take extra call for pay is solely at the discretion of the Program Director and may be withdrawn at any time. If the Program Director denies or withdraws permission to moonlight or take extra call for pay, any failure to comply with the Program Director's decision shall be considered insubordination and may lead to disciplinary action.

The Program Director must:

- have a moonlighting policy specifically stating whether trainees are allowed to moonlight;
- include individual written permission in training files;
- ensure all trainees log moonlighting hours in New Innovations (NI), as these must be counted toward all ACGME CEE hour limits (the frequency of entering hours may be at the discretion of the Program Director, but should not exceed four-week intervals); and
- utilize NI for the institutional purpose of tracking moonlighting to include at least quarterly real-time reviews of all trainees across all rotations; most programs will require more frequent monitoring.

Trainees who choose to moonlight must:

- have a valid permanent medical license;
- not be a visa holder (to maintain compliance with ECFMG regulations);
- obtain own professional liability and workers' compensation insurance;
- regularly log CEE hours accurately in NI; and
- obtain Program Director's written permission.

Trainees who choose to perform extra call for pay must:

- be performing in the role of a McGaw trainee with faculty supervision;
- adhere to their base hospital and site of call policies and requirements;
- regularly log CEE hours accurately in NI; and
- obtain Program Director's written permission.

The GMEC shall:

- approve and maintain a moonlighting policy from each training program via the Annual Program Evaluation (APE) process; and
- review instances of non-compliance based on NI data and request follow-up as warranted.