

	Johns Hopkins School of Medicine Graduate Medical Education (GME) Policies and Forms	<i>Policy Number</i>	P&F010
		<i>Effective Date</i>	07/01/2023
	<i>Subject</i> Moonlighting of Residents and Clinical Fellows in ACGME and ABMS Accredited Programs	<i>Page</i>	1 of 3
		<i>Supersedes</i>	07/01/2017

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I. PURPOSE

The Johns Hopkins University School of Medicine (JHUSOM) is committed to meaningful and enriching educational experiences for its residents and clinical fellows. This includes assurance that these residents and clinical fellows work no more than an appropriate number of hours to assure meaningful education, personal health and safety for patients. The Accreditation Council for Graduate Medical Education (ACGME) has established rules governing the performance of moonlighting activities by residents and clinical fellows enrolled in ACGME approved programs. Johns Hopkins is committed to compliance with these rules. Also, Johns Hopkins has adopted some additional Hopkins specific requirements for approved moonlighting. Hopkins policies, which address both the ACGME and Johns Hopkins requirements, are included in this policy.

II. DEFINITIONS

ABMS	American Board of Medical Specialties
Accredited Johns Hopkins Training Program	Johns Hopkins Training Program that is accredited by the ACGME or ABMS and includes all years through the final required year of the Program, as designated by the Program Director; it does not include voluntary years of training in the same specialty/subspecialty subsequent to the final required year of the Program
Resident	Physician who is enrolled in an Accredited Johns Hopkins Training Program for a clinical specialty
Clinical Fellow	Physician who is enrolled in an Accredited Johns Hopkins Training Program for a clinical subspecialty
Moonlighting	Patient care or non-clinical activities that are external to the resident's or clinical fellow's Accredited Johns Hopkins Training Program
Internal Moonlighting	Activity which takes place at The Johns Hopkins Medical Institutions or at the resident's/ clinical fellow's educational program's Participating Institution(s)
Participating Institution	An institution to which residents or clinical fellows rotate in the resident's or clinical fellow's Accredited Johns Hopkins Training Program

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Johns Hopkins Medical Institutions	Includes: The Johns Hopkins Hospital, Johns Hopkins Bayview Medical Center, Johns Hopkins Medical Services Corporation/Johns Hopkins Community Physicians, Johns Hopkins Howard County Medical Center, Suburban Hospital, Sibley Hospital and All Children's Hospital
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III. APPLICABILITY

This policy applies only to moonlighting activities of residents and clinical fellows who are enrolled in an Accredited Johns Hopkins Training Program. This policy does not apply to physicians with a faculty appointment, as assistant, instructor or above.

IV. CONDITIONS AND REQUIREMENTS

- A. No resident or clinical fellow may be required, as a condition of his or her Accredited Johns Hopkins Training Program, to perform moonlighting activities.
- B. Residents (PGY2 and above) and clinical fellows in an Accredited Johns Hopkins Training Program may moonlight, but only after filing a Moonlighting Request Form (See Appendix A) and receiving the signed approval of his/her Training Program Director, the representative of the moonlighting site and the Senior Associate Dean for Graduate Medical Education. Approved Moonlighting Request Forms are to be made a part of the resident's/clinical fellow's file.
- C. Internal moonlighting is not permitted in the specialty (or subspecialty for fellows) that is the subject of the resident's/clinical fellow's Accredited Johns Hopkins Training Program unless the Senior Associate Dean for Graduate Medical Education grants a specific exception in a case where the moonlighting activities are not central to the resident's/clinical fellow's training program. Fellows may moonlight in the specialty for which they have completed their residency training.
- D. No resident or clinical fellow may moonlight without the resident/clinical fellow first having obtained both an unrestricted license to practice medicine and controlled dangerous substance registration in the state in which the moonlighting activity is to take place as well as DEA registration. Residents/clinical fellows whose job responsibilities in their moonlighting position will not require prescribing medications may be exempted from the controlled dangerous substance and/or DEA registration requirements and should file a written request together with their Moonlighting Request Form.
- E. No resident or clinical fellow may moonlight without first having been appropriately credentialed by the hospital or facility where the moonlighting is to occur.
- F. The number of hours worked by a resident or clinical fellow in moonlighting activities, together with the hours worked in the Accredited Johns Hopkins Training Program, may not exceed the ACGME guidelines for work hours for the resident's/clinical fellow's specialty/subspecialty. The Training Program Director for the resident or clinical fellow must approve and monitor the number of hours that the resident/clinical fellow may engage in moonlighting activities per week.
- G. Moonlighting activities are prohibited if they are inconsistent with the principles of providing residents/clinical fellows with sufficient time for rest and restoration to promote the resident's/clinical fellow's educational experience and safe patient care. Therefore, the Training Program Director shall monitor the effect of moonlighting activities on resident/clinical fellow performance. The Training Program Director or the Senior Associate Dean for Graduate Medical Education may withdraw permission for moonlighting activities at any time if they determine, in their sole discretion, that the moonlighting activity is having an adverse effect upon the resident's/clinical fellow's participation in the educational program in which he/she is enrolled.
- H. A resident or clinical fellow who intends to engage in and bill for moonlighting activities (directly or through his/her employer/contractor) must comply with the JHUSOM Policy Regarding Professional Fee Billing for Residents and Clinical Fellows in Accredited Programs.

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- I. Residents and clinical fellows performing approved moonlighting activities at any of the Johns Hopkins Medical Institutions will be covered under Johns Hopkins Professional Liability Insurance. However, residents and clinical fellows performing approved moonlighting activities at any hospital/facility other than a Johns Hopkins Medical Institution will not be covered under Johns Hopkins Professional Liability Insurance. A resident or clinical fellow who intends to engage in moonlighting activities at hospitals/facilities other than the Johns Hopkins Medical Institutions must ensure that he/she will be covered by professional liability insurance at the location at which the moonlighting activities take place. NOTE: EVEN THOUGH MOONLIGHTING HOURS AT A PARTICIPATING INSTITUTION COUNT TOWARD COMPLIANCE WITH THE ACGME WORK HOURS GUIDELINES (SEE PARAGRAPH F ABOVE), THE RESIDENT/ CLINICAL FELLOW IS NOT COVERED BY JOHNS HOPKINS PROFESSIONAL LIABILITY INSURANCE FOR MOONLIGHTING ACTIVITIES AT A PARTICIPATING INSTITUTION UNLESS THAT INSTITUTION IS ONE OF THE JOHNS HOPKINS MEDICAL INSTITUTIONS, AS DEFINED ABOVE.
- J. An Accredited Johns Hopkins Training Program may adopt policies governing residents or clinical fellows in that program which are stricter than the conditions and requirements of this policy.
- K. Any individual sponsored on a J1 or H1B visa is NOT permitted to engage in any moonlighting activities.