



Resident Moonlighting Policy

Scope

Applies to all residents moonlighting within Providence Holy Family and Providence Sacred Heart Medical Center

Purpose

This policy will address specific guidelines and procedures for residents/fellows seeking to participate in moonlighting activities.

Definition

Moonlighting:

CMS allows residents to furnish and separately bill for inpatient physicians' services provided outside the scope of their approved GME program. Residents may moonlight in the outpatient department, emergency department, or the inpatient setting of a hospital where they train, so long as the following three criteria are met:

- (i) the services are identifiable physicians services and meet the conditions for payment of physicians services to beneficiaries by providers
- (ii) the resident is fully licensed to practice medicine, osteopathy, dentistry, or podiatry by the state in which the services are performed
- (iii) the services can be separately identified from those services that are required as part of the approved GME program.

Resident: A physician in an accredited graduate medical education program (including interns and residents) whose scope and hours of work is defined by the program requirement of a particular specialty (derived from ACGME).

Criteria

To qualify for a moonlighting engagement at Providence Holy Family or Providence Sacred Heart, a resident must:

- Be in their final year of residency training, and applying to work within their primary specialty
- Be in good standing with the Residency Program in which they are enrolled
- Meet Hospital credentialing requirements as defined in hospital bylaws, with the exception of completion of a residency program
- Provide written approval from the Residency Program Director

Procedure

Approval of each candidate must be granted by the Credentials Committee and MEC prior to start of work. Residents may only work in setting(s) with immediate in-house physician supervision, and within the scope of granted privileges.

Residents are responsible for recording work hours in accordance with CMS and Residency program requirements

Approval will be granted for each moonlighting engagement and will last no longer than one year.

Payment for moonlighting services and adherence to Department of Labor regulations is the responsibility of the group employing the resident

Residents are not members of the unified medical staff, but they are eligible for the following:

- Medical staff lounge meals and foods
- Medical Library and librarian access
- Grand Rounds, M&M, CME, and PPEC activities
- Medical Staff funded Employee Assistance program

References:

https://www.acgme.org/globalassets/PDFs/ab_ACGMEglossary.pdf

<https://www.aamc.org/advocacy-policy/washington-highlights/cms-releases-interim-final-rule-covid-19-regulatory-changes>

