



Policy Number GME-8242-011  
Date of Last Review Month Year: 07/2018  
Date of Last Revision Month Year: 05/2022  
Policy Owner(s) Department GME

Institutional Requirement IV.K.1  
2022 Accreditation Council for  
Graduate Medical Education (ACGME)

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## Graduate Medical Education: Moonlighting

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### I. Purpose

The purpose of this policy sets forth the expectation that the Department of Graduate Medical Education (GME) maintain a policy regarding professional activities outside the educational program per Accreditation Council for Graduate Medical Education (ACGME) Institutional and Program requirements.

### II. Scope

This policy applies to all **active fellows** currently enrolled and appointed to Ochsner Clinic Foundation (OCF) sponsored, accredited fellowship programs.

### III. Definitions

- **Department of Graduate Medical Education (GME):** Responsible for the administration of all OCF sponsored residency and fellowship training programs
- **Fellow:** Any trainee in an OCF sponsored fellowship training program
- **Resident:** Any trainee in an OCF sponsored residency training program
- **Moonlighting:** Compensated for and functioning as a licensed independent physician providing care within the scope for which Fellow is currently board certified or board eligible
- **Ochsner Clinic Foundation (OCF)**
- **Designated Institutional Official (DIO):** Responsible for oversight of OCF Graduate Medical Education programs
- **Graduate Medical Education Committee (GMEC):** Committee responsible for policy and oversight of Graduate Medical Education sponsored by OCF, chaired by the DIO
- **Accreditation Council for Graduate Medical Education (ACGME)**
- **Graduate Educational Temporary Permit (GETP):** Can be issued by the Louisiana State Board of Medical Examiners to an international medical graduate for the purpose of participation in an accredited training program
- **New Innovations:** OCF's GME residency management system

### IV. Policy Statement:

- a. Fellows are not required to engage in moonlighting.
- b. Residents in an Ochsner-accredited core training program are not eligible for moonlighting privileges.
- c. Fellows are eligible to submit moonlighting application to GME for approved sites in which to function as an independent physician within the scope of their **Core** specialty training program for which the applicant is currently board certified or board eligible within their respective certifying board(s).



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- d. Fellows who engage in moonlighting activities must maintain a full unrestricted Louisiana medical license. A Louisiana training permit or GETP is not adequate for moonlighting activities.
- e. Fellows who engage in moonlighting activities must obtain an individual personal DEA license and may not use the assigned OCF training DEA number.
- f. Fellows who engage in moonlighting activities must obtain appropriate medical staff credentialing and privileging for the identified moonlighting site to function as an independent physician within the scope of their **Core** specialty training program for which the Fellow is currently board certified or board eligible.
- g. Fellows who wish to engage in approved moonlighting activities must submit application to GME including explicit written approval of their Program Director and the DIO. Approved moonlighting applications will be maintained in the trainees New Innovations personnel file.
- h. Fellows seeking to engage in approved moonlighting activities outside of the Sponsoring Institutions provider number; Jefferson Highway, Baptist, Elmwood and West Bank campuses are required to obtain written proof for professional liability insurance coverage for each approved location within Ochsner's network and partnering sites. If the fellow's current liability insurance coverage does not provide coverage to the approved Ochsner network and partnering sites, fellows are required to obtain their own professional liability insurance coverage, for limits no less than \$1million per claim and \$3million annual aggregate. Proof of insurance must be appended with application submission for any OCF network or partnering site requests.
- i. **Moonlighting opportunities include and are restricted to, Jefferson Highway Campus, Baptist Campus, West Bank Campus, Elmwood Campus, including Ochsner's network and partnering sites within the Greater New Orleans area.**
- j. Time spent by fellows moonlighting must be counted toward the 80-hour maximum weekly limit as defined in the ACGME – Common Program Requirements (*CPR VI.F.5. Moonlighting*). Fellows approved moonlighting activities must be included in hours worked and documented in the New Innovations residency management system. The Program Director or his/her designee will be responsible for monitoring moonlighting hour logs ensuring compliance with the Clinical and Educational Work hours as defined by the ACGME including:





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- i. All clinical and educational work hours must be limited to no more than 80 hours per week, averaged over a four-week period, inclusive of all in-house clinical and educational activities, clinical work completed from home, and all moonlighting.
- ii. Fellows should have eight hours off between scheduled clinical work and education periods.
- iii. Fellows must have at least 14 hours free of clinical work to include moonlighting, and education after 24 hours of in-house call.
- iv. Fellows must be scheduled for a minimum of one day in seven free of clinical work and required education (when averaged over four weeks). Moonlighting or at-home call cannot be assigned on these free days.
- v. Clinical and educational work periods for fellows must not exceed 24 hours of continuous scheduled clinical assignments.

**Failure to comply with ACGME Clinical and Educational work requirements will result in revoked moonlighting privileges.**

- k. Moonlighting hours will be limited to a maximum of **24** hours per month. Exceptions to this restriction will be considered on a case-by-case basis and approval must be granted by the Program Director and the DIO prior to additional shift scheduling.
- l. Moonlighting is a privilege. Fellows who choose to moonlight must be monitored by their Program Director as privileges will be revoked if he/she feels that the moonlighting is adversely affecting the fellow's performance in the accredited training program. The Sponsoring Institution or ACGME-accredited programs may prohibit moonlighting by fellows.
- m. Any fellow on an active Performance Improvement Plan (PIP), non-disciplinary or disciplinary is considered to be ineligible for moonlighting privileges. Fellows must be in good standing and progressing satisfactorily as determined and documented by the Program Director.
- n. Ochsner provided liability coverage **does not** extend to **non-approved, off campus medical employment** activities, and participation in these activities could result in the termination of the participating fellow's designated training.



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- o. J1-Visa holders are prohibited from all moonlighting privileges. J1-ECFMG sponsored physicians have a chosen primary objective of graduate medical education. Those on a J1 visa may not receive compensation for activities that are not part of the designated training program. Therefore, work outside of the designated training program, or "moonlighting" is not permitted.
- p. Violation of this policy will result in immediate suspension or termination of the fellow from their designated training program.

### V. Procedure:

- a. Application for moonlighting privileges **must be submitted annually at the beginning of each Academic Year**. Moonlighting privileges do not carry over from year-to-year. Supporting documentation is required to be included at the time of GME application review:
  - i. Completed application with signature approvals including Program Director
  - ii. Copy of Unrestricted Louisiana Medical license
  - iii. Copy of Personal DEA license
  - iv. Proof of approved credentialing documentation
  - v. Proof of Medical Malpractice insurance for sites other than Jefferson Highway Campus, Baptist Campus, West Bank Campus and Elmwood Campus
- b. Scheduling of moonlighting shifts is prohibited until completion of application review and notification of approval by GME ensuring all requisite criteria have been verified. Notification of application status will be provided directly to Fellow and Program Director.
- c. An identified representative from approved site(s) is required to submit moonlighting reports bi-weekly to GME ensuring compliance with duty hour monitoring. Reports should be submitted bi-weekly or as applicable to [GME@ochsner.org](mailto:GME@ochsner.org).
- d. Moonlighting application process may require up to 2-weeks from receipt of submission for processing and notification.



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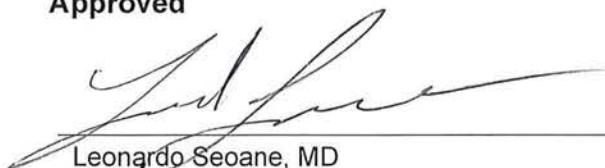
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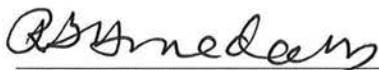
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Any non-compliance with the requirements of this policy, accrediting and regulatory agency regulations in the scope of moonlighting activity will be grounds for immediate dismissal from the Fellow's designated training program.

**Approved**



Leonardo Seoane, MD  
Senior Vice President and Chief Academic Officer



Ronald G. Amedee, MD  
Dean – Medical Education



Rajiv Gala, MD  
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**Policy History**

Date of Issue: 07/1999

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