Purpose

The **Psychiatry Residency Program** must maintain a written program-specific Moonlighting policy consistent with the Sponsoring Institutional (SI) Policy as well as the ACGME specialty specific Psychiatry Program Requirements and the Common Program Requirements. The following applies to moonlighting by residents in the Psychiatry Residency Program (collectively, the "trainees").

Policy

General Requirements

- Trainees **are not required** to engage in moonlighting activities while in the training program.
- The Sponsoring Institution, through the Designated Institutional Official (DIO), or the individual training programs, through the program director, may at their sole discretion prohibit eligible trainees from moonlighting at any time and for any reason.
- Postgraduate Year (PGY)-1's are not permitted to moonlight.
- Trainees must have an unrestricted, permanent license to practice medicine in each state where they moonlight. Trainees holding a temporary/training medical license are not permitted to moonlight.
- The USCIS (US Citizenship and Immigration Service) prohibits trainees on a J-1 Physician Visa, regardless of PGY training level, from moonlighting at any location. Such trainees are not allowed to engage in any kind of employment- clinical or non-clinical - in compliance with and as enforced by the USCIS. Any engagement in any employment outside Sponsoring Institution's residency training program may be grounds for termination and deportation per USCIS.
- If a program director or DIO suspends moonlighting for an individual or for a program, they must report such to the Graduate Medical Education Committee (GMEC) at the next GMEC meeting. To reinstate a program's moonlighting, the program director or DIO must seek GMEC approval. Individual trainee moonlighting may be reinstated by the program director without additional approval if it has been suspended on an individual basis, however GMEC still must be informed during the next meeting. Moonlighting is prohibited during the trainee's official working hours, and during night call rotation, weekend call or any holiday call assigned to the trainee, unless the trainee (a) has approved annual leave coinciding with these assignments and (b) their request for moonlighting has been approved in advance in accordance with this policy.
- Moonlighting is prohibited while the trainee is on sick leave, parental leave, administrative leave, or FMLA leave, no exceptions.
- Programs' Clinical and Educational Work Hour Policies apply to their respective trainees' moonlight activities. As such:
    - Trainees must maintain eight (8) hours duty-free between all scheduled shifts inclusive of moonlighting.
    - All moonlighting will be counted towards the trainee's 80-hour weekly limit on duty hours when averaged over four weeks.
- Moonlighting hours must be logged into New Innovations at the end of every week. This should be confirmed by the program coordinator or the program director prior to approving the next moonlighting request.
- When moonlighting, trainees must:
    - Not use their University Medical Center (UMC) prescription numbers when moonlighting at other sites, as UMC prescription numbers are site specific;
    - Properly complete controlled substance prescriptions to include the patient's full name, address, and date of issuance;
    - Follow the accepted guidelines and policies/procedures of the site where moonlighting;
    - Be cognizant of and comply with Medicare fraud and abuse guidelines as well as state ethics requirements; and

    - Maintain individual accountability and responsibility for understanding the requirements and implications of any contracts, attestations, or any other statements signed by the trainee as an independent moonlighting physician.
- Residents and fellows are discouraged from moonlighting in chronic pain management or weight loss clinics.

Approval Requirements

Any eligible trainee who wishes to engage in moonlighting must obtain advance written permission from the program director prior to undertaking such activities. This advanced written request for permission must be submitted to the Program five (5) working days before the first moonlighting shift, and should include copies of the following documents as provided by the resident/fellow:

Requests to Moonlight in the State of Alabama

A. Copy of current full unrestricted medical license;
B. Copy of current Alabama Controlled Substance Certificate (ACSC);
C. Copy of current Certificate of Coverage for medical liability insurance for the facility you plan to moonlight. Malpractice coverage by the Professional Liability Trust Fund (PLTF) may not be provided at sites selected by the trainee to moonlight; therefore, it is incumbent upon the trainee to disclose such moonlighting (see above written permission requirement) in advance so that proper liability coverage decisions can be made;
D. Copy of logged clinical and educational work hours, including moonlighting hours, in New Innovations for the previous month;
E. Copy of current Certificate reflecting personal Drug Enforcement Agency (DEA) number;
F. Copy of the proposed monthly schedule for the facility you plan to moonlight; and
G. Copy of In-Training Exam (ITE) scores.

Requests to Moonlight Out of State

A. Verification of a full unrestricted license for the particular State must be sent to the Tuscaloosa College of Community Health Sciences Psychiatry Residency Program directly from the state board of medical examiners of that state. (This verification must be provided on a yearly basis);
B. Copy of current Certificate of Coverage for medical liability insurance for the facility you plan to moonlight. Malpractice coverage by the Professional Liability Trust Fund (PLTF) may not be provided at sites selected by the trainee to moonlight; therefore, it is incumbent upon the trainee to disclose such moonlighting (see above written permission requirement) in advance so that proper liability coverage decisions can be made.
C. Copy of logged clinical and educational work hours, including moonlighting hours, in New Innovations for the previous month;
D. Copy of current Certificate reflecting personal Drug Enforcement Agency (DEA) number;
E. Copy of the proposed monthly schedule for the facility you plan to moonlight; and
F. Copy of In-Training Exam (ITE) scores.

Additional Requirements Regardless of Location

- Trainees must submit a request for moonlighting monthly, and written approval from the program director of the trainee's moonlighting will remain in force until the end of the calendar month in which said approval was given (unless withdrawn as set forth herein). The trainee must submit a new request that includes a copy of the required documents and obtain written approval from the program director for each subsequent month they wish to moonlight. Trainees must attach the required documentation to their moonlighting request every month. Statements such as "documents previously on file" will not be acceptable.
- It is the sole responsibility of the trainee to obtain his/her own full unrestricted state license, state-controlled substance license, and personal DEA number before submitting the request of moonlighting.

- If the trainee's moonlighting is resulting in adverse effects for the trainee or the DIO and/or program director otherwise determine that the trainee's moonlighting should be discontinued for any reason, as determined in the program director's sole discretion, permission to moonlight will be withdrawn.

Infectious Disease Precautions While Moonlighting

- Trainees must adhere with the Centers for Disease Control and Prevention (CDC) and the Alabama Department of Public Health (ADPH) guidelines regarding use of personal protective equipment (PPE), when clinically appropriate, during all moonlighting activities;
- If a trainee has significant exposure to a confirmed or suspected CDC infectious transmittable disease, e.g. TB, the trainee must discuss the exposure with the program director before returning to work. Trainees are responsible for assessing the facility where they plan to moonlight for the adequacy of safety precautions, appropriate screening of patients, the availability of PPE, the availability of sterilization/sanitation products, and any other health or safety precautions, and determining, in trainee's sole discretion, whether to proceed with the moonlighting activity.

Program Guidelines

- All outside employment must be reported to UA annually.
- The moonlighting requirements apply to any sort of employment, including but not limited to outpatient medicine, inpatient medicine, emergency medicine, urgent care, telemedicine, medical chart review, wellness physical exams, sports physicals, and any other patient-involved activities that occur beyond the confines of the Sponsoring Institution.
- The trainee must be in good academic standing, as determined by the program director, to be eligible for moonlighting.
- As set forth herein, the program director must give prior permission in writing for the trainee to participate in moonlighting. This approval must be maintained in the trainee's file.
- Each program must monitor the effects of moonlighting activities on a trainee's performance in the program. If the trainee's moonlighting is resulting in adverse effects for the trainee, the program should withdraw permission to moonlight. The program director shall report to GMEC any circumstances where approval was withdrawn due to adverse performance impacted by moonlighting.
- This policy and any modifications thereto will be communicated to trainees, which may include communication during Intern Orientation, Upper-Level Orientation, after obtaining full unrestricted licensure, during resident forums.
- Trainees must sign and acknowledge this policy before starting any moonlighting activity, and the signed copy will be retained in the trainee's file in the residency office.

Consequences

Any violation of this Policy by a trainee may result in immediate revocation of previously approved moonlighting permissions, prohibition of any future moonlighting activities while enrolled in the training program, or other disciplinary action as may be appropriate.

References

Clinical and Educational Work Hour Policy - Overall

Scope

This policy applies to all residents and other participants associated with The University of Alabama-Tuscaloosa **Psychiatry Residency** Program.