

 <p><b>All HFHS Includes:</b>                  Behavioral Health Services                  Community Care Services                  Corporate Services                  Henry Ford Hospital                  Henry Ford Medical Group                  Kingswood Hospital                  Macomb Hospitals                  West Bloomfield Hospital                  Wyandotte Hospital</p>	<b>Policy Name/Subject:</b> Moonlighting, Extra Shifts and Paid Call (MEP 220)		<b>Policy No:</b> MEP 220
	<b>Type of Document:</b> Policy		
	<b>Applies to:</b> Tier 1: System-wide <b>Business Unit:</b> All HFHS <b>Site:</b> [Site] <b>Department:</b> Graduate Medical Education		
	<b>Category:</b> Clinical <b>Sub-Category:</b> Graduate Medical Education		<b>Current Approval Date:</b> 6/8/2017 <b>Last Revision Date:</b>
	<b>Owner:</b> Graduate Medical Education		<b>Approver:</b> HFAH GMEC, HFH GMEC, HFMH GMEC, HFWH GMEC
	<b>Related Policy/Procedure:</b> <i>Include title and number</i>		
	<b>Author:</b> Graduate Medical Education		
	<b>External Regulatory Requirement:</b> ACGME;AOA		
	<b>Audience:</b> Interns, Residents & Fellows (House Officers)		
	<b>Key Words:</b> voluntary shifts; GME; Medical Education; moonlighting		

**Purpose**

The purpose of this policy is to specify the circumstances under which House Officers may engage in moonlighting, extra shifts and paid call, as well as the criteria which must be satisfied by the House Officer who engages in such activities. The criteria for such activities takes into account the legal, regulatory and accreditation requirements, patient care needs, the House Officer’s educational goals and HFHS policy requirements.

**Policy**

House Officers shall devote themselves conscientiously to the performance of their full-time professional efforts as defined by Medical Education policies and graduate medical education program (Program) requirements. Required Program obligations take precedence over all moonlighting and voluntary extra shifts and must not interfere with the House Officer’s ability to achieve the goals and objectives of their Program. Moonlighting must not interfere with the ability of the resident to achieve the goals and objectives of the educational program, and must not interfere with the resident’s fitness for work nor compromise patient safety.

Time spent by residents in internal and external moonlighting must be counted toward the 80 hour maximum weekly limit. PGY 1s are not permitted to moonlight.

House Officers must be in good standing within their Program to be granted permission to moonlight and take voluntary extra shifts. All moonlighting, voluntary extra shifts and mandatory paid call must be reported as clinical and educational work hours and total clinical and educational work hours may not exceed the ACGME or AOA requirements. Both the institution and program director must closely monitor all activities.

Moonlighting and voluntary extra shifts that (a) are not authorized, (b) create a conflict of interest, (c) result in impaired efficiency, absenteeism or tardiness, or (d) are performed during scheduled Program hours, will subject the House Officer to disciplinary action up to and including dismissal. Individual programs may have additional requirements or restrictions.

Approved moonlighting, voluntary extra shifts and mandatory paid call benefiting the Henry Ford Health System are covered by HFHS-provided professional liability insurance. House Officers are not covered by the HFHS-provided insurance when moonlighting at non-HFHS facilities or being compensated by a non-HFHS entity, even if approved.

<b>Definitions &amp; Requirements</b>	<b>Moonlighting:</b> Independent Clinical Activity (CMS definition)	<b>Voluntary Extra Shifts:</b> Supervised Clinical Service	<b>Mandatory Paid Call:</b> Supervised Clinical Service
<b>Prior Approval Required (form)</b>	Yes	Yes	No
<b>Supervision vs. Privileges</b>	Must apply for medical staff privileges or credentials	Supervision same as in program	Supervision same as in program
<b>Minimum Licensure Requirements</b>	Full Medical & Independent DEA	Educational Medical & Hospital DEA	Educational Medical & Hospital DEA
<b>Allowed on Visa</b>	H1-B*	H1-B*	H1B* and J-1
<b>Malpractice</b>	Moonlighting within HFHS is covered by HFHS; activities external to HFHS are not	Covered by HFHS	Covered by HFHS
<b>Program Requirement</b>	No	No	Yes
<b>Number of calls must be equal for PGY level in the program</b>	N/A	N/A	Yes
<b>Where allowed</b>	If in an ACGME or AOA accredited program, allowed only in Program Hospital Outpatient, including Emergency Dept., AND outside of program; OR External to Program Hospital  If in a non-accredited fellowship program, allowed also in Program Hospital Inpatient	May or may not be in program	In program only
<b>House Officer bills for services</b>	Yes	No	No
<b>Supervising Physician bills for services</b>	No	Yes, in accordance with payor guidelines as documented in EMR (present for key portions of service; attestation)	Yes, in accordance with payor guidelines as documented in EMR (present for key portions of service; attestation)
<b>Method of Payment to House Officer</b>	Hourly, through moonlighting account (SH3); charged to clinical department	Hourly, at established GME rates, through paid call account (SHX); charged to clinical department	Appendix to GME contract for specific number of required calls and associated stipend; charged to clinical department

<b>Example</b>	Cardiology Fellow takes call as a Hospitalist at West Bloomfield Hospital; WB credentials and established hourly rate for services.	EM resident taking additional shift (beyond required in the program)  IM resident taking a shift in ED (supervised as in the program)	All Fellows in a program must take 10 calls per year above the basic program requirements. All are paid for 10 calls only as a stipend.
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\*Requires application to Immigration, consult HFHS immigration attorney.

Requests to moonlight and take voluntary extra shifts must be approved by the applicable Program Director<sup>1</sup>, at his/her discretion, taking into account the House Officer’s current educational performance, adherence to the clinical and educational work-hour policy, safe patient care and other such factors as the Program Director deems appropriate. A House Officer on probation may not moonlight or take voluntary extra shifts.

The Program Director must:

- Monitor House Officer moonlighting and voluntary paid shifts to ensure that there is sufficient time for rest and restoration to promote the House Officer’s educational experience and safe patient care. The number of hours must not, when added to program hours, exceed the ACGME or AOA clinical and educational work-hour requirements.
- The Program Director, may, at his/her discretion, rescind approval for moonlighting and voluntary paid shifts.

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<sup>1</sup> The AOA also requires the Director of Medical Education to approve moonlighting requests.