

Residents/Fellows
Moonlighting Within the University of Kentucky HealthCare Enterprise
Requirements Document

Step One: Requestor

- Defined as the individual who wishes to utilize resident or fellow services for moonlighting activities within the UK HealthCare Enterprise.
- It must be clearly understood by all parties that resident participation in moonlighting activities is optional.
- Must describe the proposed moonlighting activity in detail, identify the resident or fellow, identify dates and times of proposed activity, and attest that the duty hours of the core training program will not violate the ACGME limitations.
- Must ensure that the services requested are outside the scope of their training program and that the moonlighting activity will not count toward the completion of any of their training program requirements.
- Must ensure that resident is qualified to perform the services identified. Provide supporting documentation that reflects the competency and experience level.
- Must complete Part 1 of the “Internal Moonlighting Request Form.”

Step Two: Residency Program Director

- Must agree that the resident/fellow may participate in proposed moonlighting activity.
- Must document any limitations that he/she deems appropriate on the moonlighting activity.
- Must determine if participation in the moonlighting activity poses any problems relative to the ACGME duty hour requirements.
- Must complete Part 2 of the “Internal Moonlighting Request Form.”

Step Three: Graduate Medical Education Office

- Must confirm licensure of participant.
- Must determine if resident/fellow is in an approved program certified by the Accreditation Council for Graduate Medical Education (ACGME)

and/or if a certificate is available by a member board of the American Board of Medical Specialties (ABMS).

- Must determine if the resident/fellow is counted for Direct Medical Education (DME) payment under Medicare Part A.
- Must complete Part 3 of the “Internal Moonlighting Request Form.”

Step Four: Medical Malpractice Claims Committee (MMCC)

- Review circumstances surrounding the request to determine overall need to the institution.
- Review experience and competency level of the individual.
- Authorize or deny coverage for malpractice insurance.

Step Five: KMSF

- Determine anticipated payer mix to estimate impact of Medicare patients. All Medicare bills are to be suppressed and written off. Medicare regulations do not allow for moonlighting in the home institution where the training program resides for inpatient services.
- Clarify that arrangement will meet the Medicaid test for allowable billing under a moonlighting arrangement.
- Ensure moonlighting contract has been completed.
- Submit for approval/notification to the Billing Guidelines and Compliance Committee.
- Must complete Part 4 of the “Internal Moonlighting Request Form.”

Step Six: Requestor

- If cleared by the above entities, requestor makes final determination as to whether to proceed based upon clinical need and billing capabilities.
- If decision is to proceed, requestor has resident/fellow complete moonlighting contract, contacts Department Administrator to initiate payroll requirements, and forwards credentials and request for privileges to the Medical Staff Affairs Office.

Step Seven: Medical Staff Affairs Office

- Reviews all materials.
- Determines if qualifications of resident/fellow meet clinically acceptable standards for performance of expected duties under the moonlighting arrangement.
- Initiates standard credentialing process.
- Approves and establishes privileges.

Step Eight: Resident/Fellow, Residency Director, GME Office, KMSF

- Resident/Fellow and Residency Director must assume responsibility to ensure that the on-going moonlighting activity does not violate the ACGME 80-hour limitation for duty hours.
- GME Office will reconcile the schedules with overload forms.
- KMSF will compare billing dates to standard and overload schedules.