

Moonlighting in this document refers to voluntary, compensated, medically related work beyond a resident's or fellow's clinical experience and education hours, and additional to the work required for successful completion of the program.

Whether to allow moonlighting of any kind is determined by the program director.

External moonlighting: Voluntary, compensated, medically related work performed outside the site of the resident's or fellow's program, including the primary clinical site and any participating sites.

Internal moonlighting: Voluntary, compensated, medically related work performed within the site of the resident's or fellow's program, including the primary clinical site and any participating sites.

ACGME Definitions

6.25. Moonlighting

Moonlighting must not interfere with the ability of the resident or fellow to achieve the goals and objectives of the educational program and must not interfere with the trainee's fitness for work nor compromise patient safety. (Core)

6.25.a. Time spent by trainees in internal and external moonlighting (as defined in the ACGME Glossary of Terms) must be counted toward the 80-hour maximum weekly limit. (Core) *No other clinical and educational work hour requirements apply*

6.25.b. PGY-1 residents are not permitted to moonlight. (Core)

Moonlighting must not be required of any trainee during their training.

ACGME Glossary of Terms, last update 9/2025: [ab_ACGMEglossary.pdf](#)

Forms required:

Program – Yearly approval required by DIO, reviewed by GMEC

Confirm supervisor, shifts available, pay per hour, and eligibility for trainees

Work Hours audit and list of trainees participating must accompany application

Individual – Yearly approval by PD

Must confirm good standing, appropriate progress, individual work hours, and appropriate licensure

Must confirm current visa allows moonlighting, and if so, must notify ECFMG

“Good Standing” Requirements to be eligible for Moonlighting or Extra Shifts:

-Trainee remains up to date in all compliances, as well as work hours and clinical documentation.

-Trainee is progressing as expected through the specialty-specific milestones and is not under any remediation review.

-Trainee is on track to complete program on time with no extensions related to performance.

-Shifts during vacation, FMLA or approved Leave of Absence are not allowed.

-Work hour reporting for the program is at least 75% over 3mo rolling.

Procedure:

- PD must submit proposal for each internal or external moonlighting opportunity, and include audit of previous year's moonlighting activity, annually by May 1st / June 1st.
- Individual trainee must submit annual application.
- GME office will review and bring forward to GMEC for approval on an annual basis.

- Programs or trainees who fail to report timely and/or accurate work hours will lose moonlighting privileges.

External Moonlighting

Moonlighting that occurs outside of UI Health Care's physical and organizational structures. An outside entity is employing the trainee for work outside of their training and outside of UI Health Care.

Requirements for Program and Site:

- Program Director must review and approve site, supervision, compensation, and proposed shifts, and must approve individual trainees, annually. PD reserves the right to rescind approval at any time.
- Program Director must ensure work hour reporting for the program is at least 75% over 3mo rolling.
- Program Director is responsible for monitoring performance and work hours for each trainee, and providing annual audit of participating trainees and hours worked. PD must confirm individuals' fitness for work and ensure patient safety will not be compromised by participating.
- Program Director is responsible for outlining services performed and how these are different from, or will enhance, those required as a part of their training program.
 - o Work cannot be a part of the required curriculum or counted towards required minimums
 - o Work hours must be counted towards total hours per week
 - o Work must not interfere with ability of trainee to achieve goals and objectives of training program
- Site must provide malpractice or require trainee to secure independently.
- Approval must be secured by DIO/GMEC annually. GME reserves the right to rescind approval at any time.

Requirements for Trainee:

- Must apply for eligibility annually.
- Must be PGY2 or greater and have a permanent license
- Active military trainees are prohibited from moonlighting.
- Must be in good standing in the program and track all work hours weekly. Moonlighting hours should be designated as such in Med Hub. Trainee is not eligible for moonlighting shifts if on performance improvement plan or remediation, or while on vacation / FMLA / leave from training program.
- Trainees holding visas must confirm with PD and GME prior to applying.

Internal Moonlighting / Extra Shifts

Moonlighting that occurs internal to UI Health Care, the sponsoring institution. Includes shifts that are not part of core training requirements.

Tier 1 Internal Moonlighting/Extra Shifts

- Trainee receives compensation outside normal working hours to provide patient care with attending supervision
- Outside normal working hours or normal assigned shifts but can be similar to the level or type of care provided in training program. Trainee must have confirmed competency in type of care required to be eligible for moonlighting.
 - o **Tier 1a** – Trainees performing ‘**extra shifts for extra compensation**’ in their program, similar to the level of care they would otherwise do, to provide increased coverage on busy services or where increased experience is desired. *This type of moonlighting is discouraged at UIHC, and will be approved only in very limited circumstances, unless it is an established part of the training program. In those cases, it will be classified as “Extra Shifts” but is tracked and monitored in the same way.*
 - Example – Resident doing extra shifts within their own training program
 - Example – Extra Meritorious Service for senior residents in Anesthesia
 - o **Tier 1b** – Trainees performing frontline care in another service or program within their department, but **at a lower level of care** than they would normally perform in their current training program, and at a level of competency that has already been achieved
 - Example – Fellow providing frontline, resident-level care in their department
 - Example – SHE Hospitalist coverage in Internal Medicine
- Iowa limited temporary training license is sufficient
- Supervising attending is responsible for billing for services. Trainee cannot bill for services.
- Malpractice – Per hospital legal team, malpractice is covered as a part of the training program and additional assessment from UIP is not needed.

Tier 2 Internal Moonlighting

- Trainee receives compensation outside normal working hours to provide patient care as an independent medical practitioner
- Outside normal working hours or normal assigned shifts, separate from level or type of care provided in training program. Trainee must have confirmed competency in type of care required to be eligible for moonlighting.
- In accredited programs, moonlighting monitoring is required. In un-accredited or NST programs, PD may incorporate billable activities as part of the training program.
- Valid full Iowa medical license required. *CSO can credential trainee prior to start of moonlighting shifts and consider them a “Fellow Associate” with a separate identity from trainee.*
- GME and training programs do not cover cost of licensure for moonlighting.
- Trainee is eligible to bill independently.
- Trainee must obtain malpractice coverage from UIP, and must establish a second identity for billing in Epic.

Requirements for Program and Site:

- Program Director must review and approve site, supervision, compensation, and proposed shifts, and must approve individual trainees, annually. PD reserves the right to rescind approval at any time.
- Program Director is responsible for outlining services performed and how these are different from those required as a part of their training program.
 - o Work cannot be a part of the required curriculum or counted towards required minimums
 - o Work hours must be counted towards total hours per week
 - o Work must not interfere with ability of trainee to achieve goals and objectives of training program
 - o Moonlighting cannot be used for Jeopardy or scheduled back-up shifts already in effect during training program.
- Program Director must ensure work hour reporting for the program is at least 75% over 3mo rolling.
- Program Director is responsible for monitoring performance and work hours for each trainee, and providing annual audit of participating trainees and hours worked. PD must confirm individuals' fitness for work and ensure patient safety will not be compromised.
- Approval must be secured by DIO/GMEC annually. GME reserves the right to rescind approval at any time.

Requirements for Trainee:

- Must apply for eligibility annually.
- Must be PGY2 or greater and have appropriate licensure.
- Active military are prohibited from moonlighting.
- Must be in good standing in the program and track all work hours weekly. Moonlighting hours should be designated as such in Med Hub. Trainee is not eligible for moonlighting shifts if on performance improvement plan or remediation, or while on vacation / FMLA / leave from training program.
- Trainees holding visas must confirm with PD and GME prior to applying. J1 visa holders are now eligible to moonlight internally only, and are not eligible to bill independently. An additional form is required by ECFMG.

Comparison of GME Moonlighting Options

	External Moonlighting	Internal Tier 1a - Extra Shifts	Internal Tier1b	Internal Tier 2	Other Types of Moonlighting
Requirements	Full Iowa Medical License Billing Eligible	Must be considered part of training program Cannot include required, unexpected, or unplanned work or shifts within training program	Limited temporary training license No Billing	Full Iowa medical license Billing Eligible	No billing All proposals must be reviewed by GME
Description	Outside of UIHC	At UIHC A – level of care in current training program	At UIHC B – different level of care than in current training program	At UIHC	Consulting No clinical work required
Supervision	Per Site Director Attending supervision not required	Direct or indirect supervision by attending required	Direct or indirect supervision by attending required	Per Site Director Attending supervision not required	
Eligible Trainees	PGY2 or greater Residents or Fellows No J1 visa holders	PGY2 or greater Residents or Fellows *J1 visa holders eligible	PGY2 or greater Residents or Fellows *J1 visa holders eligible	Fellows or Chief Residents only No J1 visa holders	
Malpractice	Must be provided by site or individual trainee	Covered under training program	Covered under training program	UIP	Depending on task – must be reviewed by legal
Tracking by GME	Med Hub Hours	Paycheck approval Med Hub Hours	Paycheck approval Med Hub Hours	Paycheck approval Med Hub Hours	Med Hub Hours