COMMONWEALTH OF MASSACHUSETTS

BOARD OF REGISTRATION IN MEDICINE

POLICY 2022-01

INTERIM POLICY ON PRACTICE BY LIMITED LICENSEES

DURING PUBLIC HEALTH EMERGENCY

January 12, 2022

Amended June 29, 2023

On December 17, 2020, the Board of Registration in Medicine (Board) adopted this policy to ensure an adequate supply of physicians to staff hospitals, a measure that continues to be necessary toaddress the ongoing workforce shortages at Massachusetts hospitals which constrains their capacity to admit and treat patients resulted in care delays and reduced access to services.

The Board hereby waives limitations at 243 CMR 2.02(8)(a) to the extent required to allow holders of a limited license to engage in “internal moonlighting.” Specifically, limited licensees may engage in patient care activities outside of the limited licensee’s specialty training program provided that the activities:

1. Occur under the direction of a faculty member associated with the training program;
2. Occur at the health care facility on the limited license or at the facility’s approved affiliates;
3. Are in the same specialty as the limited licensee’s specialty training program or are approved by the program director as a training area related to the specialty; and
4. Comply with limitations set in ACGME guidelines pertaining to moonlighting.