



SAN MATEO COUNTY HEALTH  
**BEHAVIORAL HEALTH  
& RECOVERY SERVICES**

DATE: September 16, 1994

BHRS POLICY: 94-04

SUBJECT: Psychiatry Residency Training Program – Moonlighting Regulations

AUTHORITY: Divisional; Supplement to Existing County Policy

AMENDED: December 8, 2004; July 25, 2005; September 18, 2020

PURPOSE:

The purpose of this policy is to recognize the unique training needs of the Psychiatric Resident and to ensure that the resident's training is not adversely impacted by any additional employment (moonlighting) beyond their employment as a psychiatry resident at San Mateo County BHRS.

PROTOCOL:

Residents are not required to engage in moonlighting as a criterion for graduation, but PGY2-4 residents who desire to pursue moonlighting may do so in accordance with this policy and other existing county policies including County [Health Policy HS A-14 "Governing Incompatible Activities and Outside Employment for Employees of the San Mateo County Health System"](#). Moonlighting is encouraged but not required, to give residents additional exposure to and experience with the county client population. Moonlighting or any outside employment is prohibited during regularly scheduled Psychiatric Resident employment hours.

- PGY1 residents are not permitted to engage in outside employment or moonlighting. PGY1 residents who do engage in outside employment or moonlighting will be subject to review per [BHRS Policy 93-06, "Resolving Performance and Conduct Problems."](#)
- PGY2-3 residents with a postgraduate training license (PTL) may engage in moonlighting at San Mateo Medical Center (SMMC):
  - when they have passed the US Medical Licensing Examination (USMLE) Step 3 exam and obtained their DEA (Drug Enforcement Administration) license; and
  - they have been assessed to be ready for oversight level supervision as defined by ACGME; and
  - oversight level supervision is available for the moonlighting activity.
- Under certain circumstances reviewed on a case by case basis, PGY3s with a PTL and a DEA license may engage in moonlighting outside San Mateo Medical Center.
- PGY4 residents with full, unrestricted medical licenses and DEA licenses may moonlight at SMMC or outside San Mateo County without supervision.



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All residents must obtain prospective, written approval from the Program Director, for each type of moonlighting. When requesting approval, the resident must submit a form documenting the following:

- the number of psychiatry cases the resident has participated in during their regular rotations that are relevant as preparation for moonlighting (e.g., hospital cases for hospital moonlighting or outpatient cases for outpatient moonlighting)
- that they have been assessed to be ready for oversight level supervision as defined by Accreditation Council for Graduate Medical Education (ACGME) if they plan to moonlight at SMMC
- the name of the organization where they would like to moonlight
- their malpractice insurance for participating in this moonlighting
- a description of the proposed moonlighting work, including hours per shift, type of work, and approximate numbers of cases, with confirmation that the moonlighting will not violate ACGME restrictions
- if they propose to moonlight outside of SMMC, whether they will have back-up consultation from a board-certified psychiatrist if needed

The form will be reviewed by the Program Director and the Rotation Site Director who has overseen the resident’s applicable regular rotations. Once approved, this written permission will be placed in the resident’s file. Residents will review their moonlighting during regularly scheduled six-month review meetings with the Program Director.

Residents may work no more than 40 moonlighting hours in any two-week period. Additionally, the combination of moonlighting hours and residency training hours must comply with the ACGME duty hour limitations. Any moonlighting that interferes with educational or clinical responsibilities is prohibited. Residents with performance and/or conduct problems may be restricted from moonlighting pursuant to this policy and [BHRS Policy 93-06, “Resolving Performance and Conduct Problems.”](#)

Approved: \_\_\_\_\_  
*Signature on File*  
 Scott Gilman, MSA, Director  
 Behavioral Health and Recovery Services

Approved: \_\_\_\_\_  
*Signature on File*  
 Vanessa de la Cruz, MD, Medical Director  
 Behavioral Health and Recovery Services

Approved: \_\_\_\_\_  
*Signature on File*  
 Raziya S. Wang, MD, Program Director  
 BHRS Psychiatry Residency Program