



Policy Number:	94-04
Policy Name:	Psychiatry Residency Training Program – Moonlighting Regulations
Authority:	Divisional; Supplement to Existing County Policy
Original Policy Date:	September 16, 1994 Effective Date: 09/16/94
Supersedes:	N/A
Policy Last Revised:	11/03/25
Attachments:	N/A

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.

DEFINITIONS

Moonlighting as defined by Accreditation Council for Graduate Medical Education (ACGME) is voluntary, compensated, medically related work performed beyond a resident’s clinical experience and education hours and additional to the work required for successful completion of the program.

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 program, including the primary clinical site and any participating sites.

PROCEDURE/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 not required, but can at times offer residents additional exposure to and experience with the county client populations in different settings.

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 duty or compromise patient safety. Moonlighting, including Internal moonlighting at San Mateo Medical Center (SMMC), is prohibited during regularly scheduled Psychiatric Resident employment hours. Residents are not



permitted to incorporate any duties undertaken during moonlighting towards their Accreditation Council of Graduate Medical Education (ACGME) required residency hours or caseloads. The ACGME is an independent organization that sets and monitors professional educational standard in preparing physicians for independent practice.

- 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."](#)
- PGY2-4 Residents with a full, unrestricted Medical License may engage in moonlighting at San Mateo Medical Center (SMMC) when:
 - they have obtained their DEA (Drug Enforcement Administration) license; and,
 - they have been assessed to be ready to moonlight without supervision by the BHRS Residency Training Committee; and,
 - oversight level appropriate supervision is available for the moonlighting activity.
- PGY4 Residents with full, unrestricted medical license and DEA licenses may moonlight outside San Mateo County without supervision, current standing in the residency and with approval of the program director.

All residents must obtain prospective, written approval from the Program Director, for each type of moonlighting. When requesting approval, the resident must submit a Moonlighting Request 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 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 Moonlighting Request 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."](#)

SIGNATURES

Approved: _____ *Signature on File*
 Dr. Jei Africa, PsyD, FACHE
 BHRS Director

Approved: _____ *Signature on File*
 Dr. Tasha Souter, MD
 BHRS Medical Director

Approved: _____ *Signature on File*
 Dr. Brendan Scherer, MD
 BHRS Psychiatry Residency Program Director

REVISION HISTORY

Date of Revision	Type of Revision	Revision Description
11/03/25	Amend	Policy: Definitions added; language revised to be consistent with ACGME regulations; eligibility for moonlighting outside of SMC limited to PGY4 residents (previously PGY3 & PGY4)
10/14/24	Amend	Policy: Updates to moonlighting regulations for psychiatry residents
09/18/20	Amend	Policy: Amended
07/25/05	Amend	Policy: Amended
12/08/04	Amend	Policy: Amended