

Policy	Restricted Registration (“Moonlighting”) Policy
Date Approved	November 6 th , 2025
Approved By PGMEC	Sept 9 th , 2025
Effective Date	November 6 th , 2025
Approved by SOMAC	November 6 th , 2025
Approved by Faculty Board	November 6 th , 2025
Review to Commence	May 2028
Responsible Portfolio/Unit/Committee	Postgraduate Medical Education
Responsible Officer(s)	Associate Dean, Postgraduate Medical Education
Relevant Policies	COFM Restricted Registration Policy Restricted Registration Program CPSO Restricted Registration in Ontario Policy CPSO Residents Working Additional Hours for Pay Policy PARO-OTH Collective Agreement RCPSC CBD Policy Working Group Communique: Moonlighting

1. Purpose

This policy outlines the conditions under which residents may voluntarily engage in additional clinical work outside of their training program. Moonlighting may be permitted provided it does not interfere with program requirements (academic and clinical) or duty hour limits. Participation in moonlighting does not count toward the accumulation of educational credits or competencies leading to certification.

2. Scope

This policy applies to all postgraduate medical residents registered in a Royal College or College of Family Physicians of Canada residency program at Queen's University, who are considering or currently participating in clinical work beyond their training responsibilities that would require a certificate of restricted registration.

3. Definitions

3.1 CMPA Type of Work (TOW) Code

A specific CMPA designation that provides liability coverage for residents engaged in moonlighting activities outside their residency duties.

3.2 Moonlighting

Clinical work performed for compensation under a restricted registration certificate of registration that is separate from the resident's required training activities and not part of their residency program.

3.3 Restricted Registration

A CPSO licensing category that permits eligible residents with educational licenses to provide additional clinical services under defined conditions.

4. Principles

4.1 Education

A resident's *primary responsibility is to their training program*. Moonlighting must not interfere with educational objectives (e.g., attendance at academic half-days) or clinical expectations within the residency program.

4.2 Resident Wellness

Engaging in additional clinical work outside of the resident's program may lead to unintended health consequences for the trainee, recognizing that each trainee's circumstances are unique.

4.3 Patient Safety

If a resident engages in clinical work outside of their program, it must be performed safely and within their scope of training, without compromising patient safety, and under supervision per the restricted registration program.

4.4 Regulatory and Professional Accountability

Residents are expected to follow all regulatory requirements, including CPSO licensing, CMPA liability coverage, and credentialing obligations.

4.5 Transparency and Oversight

Moonlighting should be approached with openness and accountability. Residents are expected to disclose their participation, and programs have a responsibility to provide oversight to ensure moonlighting does not compromise educational or professional responsibilities.

5. Policy and Procedures

5.1 Eligibility for Moonlighting under Restricted Registration

- 5.1.1 Completion of at least 18 months of postgraduate training.
- 5.1.2 Successful completion of MCCQE Part I.
- 5.1.3 Canadian citizenship or permanent residency (visa trainees are not eligible).
- 5.1.4 Written approval from the program director.
- 5.1.5 No recent remediation, probation, or unsatisfactory evaluations (within the last 12 months).
- 5.1.6 Experience in the area where moonlighting is proposed (must have completed a relevant rotation).

5.2 Work Restrictions and Duty Hour Compliance

- 5.2.1 Residents may not moonlight at the same site they are currently assigned.
- 5.2.2 Moonlighting must not exceed the PARO-OTH Collective Agreement work hour restrictions.
- 5.2.3 Program requirements will supersede moonlighting opportunities.
- 5.2.4 A minimum of 12 hours off is required between a moonlighting shift and the next scheduled residency duty.

5.3 Wellness Safeguards:

5.3.1 Consultation with the program director and the Wellness Office will be required where:

- 5.3.1.1 the trainee is working with an accommodation plan,
- 5.3.1.2 trainees are working in a part-time capacity, or
- 5.3.1.3 the program has identified that unintended consequences may be manifesting in the performance of the trainee.

5.3.2 The Wellness Office may flag concerns if moonlighting appears to have negative consequences on established individualized plans (e.g. accommodations, part-time capacity).

5.5 Liability and Insurance

- 5.5.1 Residents must ensure the appropriate CMPA coverage is in place before beginning any moonlighting activities.
- 5.5.2 Residents are responsible for confirming this coverage is valid for their specific moonlighting role.

5.6 Credentialing Requirements

- 5.6.1 Moonlighting residents must obtain the necessary privileges and credentialing at the institution where they intend to work. This is separate from their residency appointment and must be arranged independently.
- 5.6.2 Residents must disclose any changes in their CPSO license status to the PGME office.

5.7 Application and Approval Process

- 5.7.1 Residents must apply for restricted registration through the CPSO and allow 8–12 weeks for processing.
- 5.7.2 A letter confirming program approval along with confirmation of restricted registration status must be submitted to the PGME office at barrosol@queensu.ca.
- 5.7.3 Moonlighting is not permitted to begin until all approvals and registrations are in place.

5.8 Revocation

- 5.8.1 Moonlighting privileges may be revoked at the program director's or associate dean's discretion if a resident requires new accommodations or a modified learning plan, and will be revoked if the resident enters remediation, fails to meet program expectations, or engages in conduct deemed unsafe or unprofessional.

Approval History:

PGMEC	Sept 9, 2025	SOMAC	Nov 6, 2025	Faculty Board	Nov 6, 2025
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