

**General Psychiatry Residency Program**  
**Policy for Practicing with Restricted Registration**  
(also known as Moonlighting)

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**Background**

Practicing with Restricted Registration, also known as *moonlighting* is defined as extracurricular (i.e. outside of a residency training program) provision of clinical services for remuneration, by residents registered in a postgraduate medical education program leading to certification with the College of Family Physicians of Canada (CFPC) or with the Royal College of Physicians and Surgeons of Canada (RCPSC).

In Ontario, “Restricted Registration” is a certificate issued by the College of Physicians and Surgeons of Ontario (CPSO) allowing senior residents who hold an educational license to practice under supervision outside of their residency training requirements.

The Council of Ontario Faculties of Medicine (COFM) have defined Restricted Registration as: “Residents registered in postgraduate medical education programs leading to certification with the Royal College of Physicians and Surgeons of Canada or the College of Family Physicians of Canada who provide clinical services for remuneration outside of the residency program.”

**COFM requirements** for restricted registration are as follows:

- it does not affect the ability of the resident to successfully participate in their postgraduate program,
- it does not undermine the educational environment, and
- a resident is not on remediation.

**Please note:**

- Each University and program may *determine their own criteria* for participation in RR, based on the Resident’s performance to date and the program’s assessment of their ability to perform semi-independently.
- All Programs and Postgraduate Deans reserve the right to choose not to approve an application if a Resident is not meeting the required standards in their program.
- The University of Toronto, PGME does not support residents moonlighting at the same hospital where they are currently undertaking residency training.
- Residents must obtain an RR (restricted registration) certificate if they provide clinical service for pay outside of their training program.
- Residents working on a RR certificate cannot exceed maximum duty hours as defined in the PARO collective agreement (<https://myparo.ca/your-contract/#maximum-duty-hours>).
- Due to specific arrangements regarding income tax and personal revenue, Pool C Residents/Visa Trainees are not eligible to participate in Restricted Registration.

**At *minimum*, Residents must:**

- Have successfully completed the MCCQE Parts I and II
- Have completed 18 months of residency training
- Be in good academic standing
- Be actively engaged in their residency training program (i.e. not on leave).
- Residents wishing to work in Emergency Departments must have successfully completed training in Advanced Trauma Life Support and Advanced Cardiac Life Support. (Note - This requirement is not relevant to Psychiatry)

In light of **CBD (Competence by Design)**, the RCPSC has also noted the following:

Eligibility for Restricted Registration

A resident may be deemed eligible to participate in moonlighting, predicated on whether that resident has *demonstrated competence in the skills aligned with the enhanced clinical responsibility*. Currently, eligibility is defined by year of training and by the completion of rotations that are relevant to the moonlighting service, an explicitly time-based criterion. In CBME, the focus shifts to the *demonstration of competence* as opposed to time spent in training.

Supervision and Stage of Training

Residents will continue to require supervision appropriate to their stage of training and the clinical service on which they are moonlighting. Within the Competence Continuum, the 'Transition to Practice' stage may serve as a useful point at which to consider a reduction in the level of supervision required for those residents who wish to moonlight. The delineation of the requirement for supervision will also require involvement of the provincial regulatory authority.

Revoking Restricted Registration Privileges

Current policies define circumstances under which eligibility for moonlighting can be revoked. These circumstances include concerns about **academic performance, compromise of the educational progress of the moonlighting resident and/or failure to abide to the terms of the moonlighting agreement (e.g. breaking the rules regarding maximum hours worked)**.

**Approval of RR certificate**

Based on the above information and defined requirements for a RR certificate, the General Psychiatry Residency Program at the University of Toronto supports Residents to practice with Restricted Registration under the following circumstances:

**The Resident**

- meets all COFM requirements for restricted registration as noted above
- is not currently undertaking any psychiatry residency program rotations at the site where they are practicing with RR
- fulfills all residency program and hospital site on call requirements (i.e. call requirements take precedence)
- is not exceeding maximum duty hours at per PARO collective agreement
- is provided with supervision at the site where the resident is practicing under a RR certificate commensurate with Stage of Training and demonstrated competency

The residency program accepts the RCPSC criteria for **revoking restricted registration privileges** as noted above.

Process for applying for RR certificate:

- Resident contacts Program Director with regards to intent to apply for RR, including (if known) list of hospital sites where they intend to work and what services they will be providing (e.g. emergency psychiatry consultations, inpatient psychiatry ward)
- The Program Director may contact the Psychiatrist-in-Chief at the hospital where the Resident intends to work under a RR certificate to ensure that there is adequate supervision and to clarify roles and responsibilities
- The Resident's performance in the residency program will be reviewed by the Program Director and the PRPC (Psychiatry Residency Program Committee) and a recommendation made with regards to the resident participating in the RR program

Please note that the **Program Director reserves the ability to revoke their support for a RR certificate** should there be any concerns raised about the Resident's academic performance, professionalism, capacity to successfully participate in all aspects of the residency program, PARO collective agreement adherence, or quality of supervision at the hospital site where work under a RR certificate is taking place.

**Sources for Policy**

Ontario Restricted Registration Program <https://restrictedregistrationontario.ca/>

COFM Policy <https://cou.ca/wp-content/uploads/2017/12/Restricted-Registration-Policy.pdf>

PARO [myparo.ca](http://myparo.ca)

Royal College CBD Working Group Policy Communique

<https://www.royalcollege.ca/rcsite/documents/cbd/cbd-policy-comm-moon-e.pdf>

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**Approved at PRPC Meeting:** June 7, 2021

**Date of next scheduled review:** 2024