

Title: Graduate Medical Education - Fellow Billing Policy

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I. Policy Statement

- a. In order to ensure proper billing for services rendered by Fellows, it is critical for all staff to be knowledgeable of a Fellow's billable or non-billable status. Below are guidelines to assist departments in reviewing services rendered by Fellows and determining the appropriateness of billing for such services.

II. Definitions

- a. **Resident:** Resident means an intern or resident who is formally accepted, enrolled, and participating in an approved MUHC medical training program. (based on CMS Guidelines for Teaching Physicians, Interns, and Residents and ACGME Glossary of Terms).
- b. **Fellow:** For the purpose of this policy, a fellow is a physician in a program of graduate medical education, which may or may not be ACGME approved, who has completed the requirements for Board Certification within the specialty and employed by the University of Missouri. (ACGME Glossary of Terms)
- c. **Teaching Physician:** A physician, other than an intern or resident, who involves residents in the care of his or her patients. Generally, for the service to be payable under the Medicare PFS, he or she must be present during all critical or key portions of the procedure and immediately available to furnish services during the entire service.
- d. **Moonlighting:** Voluntary, compensated work for clinical services provided as a credentialed member of the medical staff. With the appropriate approval, this may occur within MUHC or outside of MUHC.
- e. **Extra Shifts:** Supervised, voluntary, compensated work in MUHC facilities, and not related to training requirements. Additional compensation for these extra shifts at MUHC facilities is permissible with the appropriate approval.
- f. **Work Hours:** All clinical and academic activities related to a training program, patient care, both inpatient and outpatient, administrative duties relative to patient care, the provision for transfer of patient care, time spent on in-house call, moonlighting, extra shifts, and other scheduled activities such as conferences.

III. Process/Content

- a. ACGME Fellows
 - i. ACGME Fellows must be credentialed and privileged by the Hospital to perform and bill for independent patient care activities.

- ii. ACGME Fellows may also participate in supervised extra call shifts without the need to be credentialed and privileged by MUHC.
 - iii. ACGME Fellows must be permanently licensed in the State of Missouri to participate in unsupervised patient care activities.
- b. Non-ACGME Fellows
 - i. Fellows who are enrolled in a non-ACGME accredited program.
 - ii. Non-ACGME Fellows must be credentialed and privileged by the Hospital to perform independent patient care activities.
 - iii. Non-ACGME Fellows must be permanently licensed in the State of Missouri to participate in unsupervised patient care activities.
- c. ACGME Residents
 - i. ACGME Residents may participate in supervised extra call shifts without the need to be credentialed and privileged by MUHC.
 - ii. ACGME Residents are not required to be permanently licensed to take extra call shifts.

IV. Attachments

V. References, Regulatory References, Related Documents, or Links

- a. [Graduate Medical Education - Supervision Policy](#)
- b. [CMS Pub. 100-04, Chapter 12, Section 30.6.5](#)
- c. [Graduate Medical Education - Moonlighting Policy](#)
- d. [ACGME Glossary of Terms](#)
- e. [CMS Guidelines for Teaching Physicians, Interns, and Residents](#)
- f. [42 CFR 415.208 - Services of Moonlighting Residents](#)