


Title: Graduate Medical Education - Fellow Billing Policy

| | | |
|---|---|--|
|  | Document Owner: Stacie Connot | Last Approved Date: 07/14/2021 |
| | Content Expert: Christi McCoy | Ref#16175 |

Printed copies are for reference only. Please refer to the electronic copy for the latest version.

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. **Fellow:** 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)
- b. **Resident:** An individual who participates in an approved GME Program or a physician who is not in an approved GME Program, but who is authorized to practice only in a hospital setting (for example, has a temporary or restricted license or is an unlicensed graduate of a foreign medical school). For DGME and IME payment purposes, a Resident means an intern, resident, or fellow who is formally accepted, enrolled, and participating in an approved medical residency program including programs in osteopathy, dentistry, and podiatry as required to become certified by the appropriate specialty board. (CMS Guidelines for Teaching Physicians, Interns, and Residents and 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. **External Moonlighting:** Voluntary, compensated work for clinical services provided in a specialty that is not related to the training program and located at a facility outside of UMHC.
- e. **Internal Moonlighting:** Voluntary, compensated work in an UMHC outpatient department or emergency room, and not related to training requirements. Internal moonlighting in an inpatient setting at UMHC, and outside the scope of the enrolled training program, for additional compensation, is permissible with the appropriate approval, however these services cannot be billed independently by the resident. (42 CFR 415.208 - Services of Moonlighting Residents).
- f. **Duty 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 and other scheduled activities such as conferences (ACGME glossary of terms).

III. Process/Content

- a. Billing for inpatient services is not allowed per CMS 42 CFR 415.208 - Services of Moonlighting Residents.
- b. ACGME Fellows
 - i. Fellows who are enrolled in an ACGME approved program, listed on the MU Health Care Medicare Cost Report are only eligible to bill federal and state program payors for services rendered at UMHC consistent with the definition of Internal Moonlighting.
 - ii. When an ACGME Fellow provides services to a patient covered by a non-federal or state payor plan, the Teaching Physician of record must countersign the Fellow's chart entries as per standard practice for oversight of Residents.
- c. 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.

IV. Attachments

- a. [Graduate Medical Education - Fellow Billing Status Flow Chart](#)

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](#)