


# Title: Graduate Medical Education - Apprentice Physician Fellow Model - Policy

 <b>Health Care</b>	<b>Document Owner:</b> Crystal Arellano	<b>Last Approved Date:</b> 09/11/2025
	<b>Content Expert:</b> CHRISTI McCoy                      Ref#29108	

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## I. Policy Statement

The Apprentice Physician model provides structured learning opportunities for clinicians engaged in advanced training outside of ACGME-accredited programs. Apprentice Fellows are learners who must practice under faculty supervision for training, yet may independently bill for services within their primary specialty of board eligibility. Apprentice Physicians are subject to all institutional policies and state licensing requirements.

## II. Definitions

- a. **Apprenticeship Training Model:** A model of training that is completed through hands-on, practical experience under the guidance of experienced professionals.
- b. **Apprenticeship Fellow:** A physician in a Graduate Medical Education (GME) approved apprenticeship program, who are learning through hands-on, practical experience under the guidance of experienced professionals.

## III. Process/Content

### a. Eligibility:

- i. Must hold a Doctor of Medicine (MD) or Doctor of Osteopathic Medicine (DO) from an accredited institution.
- ii. Validated successful completion of an ACGME-accredited residency program in a related specialty.
- iii. Must hold a full and unrestricted medical license (to bill independently). In rare instances, a temporary or training license may be allowed with GME approval.
- iv. Must be Board Certified or eligible for Board Certification in the core specialty.
- v. VISA sponsorship may be available.
  - 1. H-1B VISA sponsorship is at the discretion and cost of the training program.

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2. J-1 VISA sponsorship typically should not be considered for an apprenticeship model. This sponsorship should be discussed with the GME Office prior to offering any position.
  - a. J-1 VISA holders may not practice or bill independently.
  - b. To sponsor the J-1 VISA in a non-ACGME accredited fellowship, the program must seek approval as a Non-Standard Training (NST) program through the Accreditation Council for Graduate Medical Education (ACGME), thus requiring monitoring by the GME Office.
- b. Process:
  - i. To be approved as an apprenticeship training program, the program director must submit to the GME Office, the following:
    1. A document outlining the schedule of rotations and experiences of the apprentice.
    2. A defined educational curriculum for the apprenticeship program.
    3. A copy of the employment contract that includes the title and salary for the School of Medicine position. *Job codes used by the GME Office for GME employed resident and fellow positions are not to be used for the apprenticeship model.*
    4. An outline of supervision policies and procedures for determining when the apprentice is a learner versus an independent clinician.
    5. A schedule of evaluations to ensure the learner is progressing through the apprenticeship appropriately.
    6. A document outlining how the learner is to track their work hours and how the program will monitor the hours worked.
    7. A list of procedures for which the training program requests the clinician to be privileged to perform independently. The requested procedures are to be in the specialty in which the clinician is board certified/eligible and adequately trained to perform. **There must be adequate supervision for procedures in which the clinician is designated as a learner and independent billing should not be requested for these procedures.**
  - ii. After the GME Office receives the required information and approves the program, the Medical Staff Office will be notified to begin the credentialing and privileging process. The MUHC Medical Staff Office

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requires 60-days' advance notice of the clinicians first independent clinical assignment.

- iii. The School of Medicine department in which the apprenticeship is housed will be responsible for employing and credentialing the candidate.
- iv. The following eligibility requirements must be in place for independent practice at MUHC:
  - 1. A permanent MO license and DEA registration.
  - 2. A current BNDD registration.
  - 3. An appropriate Work VISA when applicable (H-1B).
  - 4. Have appropriate liability coverage by virtue of their employment.
  - 5. A peer reference response is required from the current Program Director, or confirmation of completion of the primary specialty if the applicant is new to MUHC.
  - 6. Program Director endorsement of requested privileges.
  - 7. The SOM Department sponsoring the independent practice must provide a clear Criminal Background Check (CBC) with submission of the application to Medical Staff Committees for approval.
    - a. *For the purposes of credentialing, the CBC remains valid for 120 days.*
    - b. *The CBC is a requirement per the Medical Staff Credentials Procedure Manual, Section 5.1.6.5: A criminal background check will be performed at appointment. Per existing protocol, the Medical Staff Office (MSO) may request the CBC from SOM HR, on behalf of the sponsoring SOM Department.*
- v. Upon credentialing and privileging, these clinicians will be able to work independently as part of their apprenticeship program. All monitoring and quality assurance, and behavioral intervention becomes the responsibility of the sponsoring SOM Department, with a subsequent responsibility to report any adversely identified issues to the Medical Staff Office. This might be either singular events, or ongoing interventions through the FPPE or OPPE process.
- vi. With approved credentials and clinical privileges, the applicant is eligible to apply for billing status with Provider Enrollment. This application process is the responsibility of the SOM Department sponsoring the independent practice.

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## **Billing by Supervisory Attending Physicians Utilizing the Apprenticeship Fellow's Documentation:**

- vii. For supervisory attending billing purposes under CMS regulations, when a clinician is in a learner role, an attending may only refer to the apprentice fellow's note if the fellow is enrolled in an approved GME program or holds a temporary or training license.

### **IV. Attachments**

- a. [Graduate Medical Education - Moonlighting Policy](#)
- b. [Graduate Medical Education - Application to Moonlight](#)
- c. [Graduate Medical Education - Fellow Billing Policy](#)
- d. [Medical Staff - Bylaws](#)
- e. [Medical Staff - Credentials Procedure Manual](#)
- f. [Medical Staff - Interventions and Hearing Manual](#)

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

- a. [Accreditation Council for Graduate Medical Education](#)