

PROCEDURE GME39

Subject: BILLING BY FELLOWS IN
NON-ACGME PROGRAMS

Effective Date: AUGUST 2021

Applies to: HOUSTON METHODIST HOSPITAL
SYSTEM - GME

Date Revised/Reviewed:

Originating Area:
GRADUATE MEDICAL EDUCATION COMMITTEE

Target Review Date:
AUGUST 2024

I. GENERAL STATEMENT

Residents and Fellows in ACGME programs are not eligible to bill for any patient care services that they provide. Such services are billed under the name of the attending physician. Medicare rules allow for fellows who are not in approved programs, as defined below, to bill for services in their own name. Houston Methodist Medical Staff Bylaws have been adapted to allow these fellows in non-ACGME programs to bill provided they meet all applicable credentialing criteria for their core specialty and would be eligible to bill under Medicare billing rules.

This procedure establishes the process for establishing the requirements to allow Fellows in non-ACGME and non-ABMS approved programs to bill for services and to ensure compliance with CMS guidelines addressing billing for professional services rendered with or by fellows.

II. GENERAL REQUIREMENTS FOR FELLOWS TO BILL

- A. An Approved Program is defined as any program accredited by the ACGME and/or where certification by a member board of the American Board of Medical Specialties (ABMS) is available.
- B. An Unapproved Program is defined as any program non-ACGME and where certification by a member board of the American Board of Medical Specialties (ABMS) is not available.
- C. Houston Methodist Hospital Medical Staff Bylaws, June 2021, state that Practitioners (any physician, podiatrist, or dentist holding a current license to practice within the scope of his license) participating in non-ACGME advanced fellowship training programs may be eligible for Medical Staff membership provided they meet all applicable credentialing criteria for their core specialty.
- D. In order for non-ACGME Fellows to be considered eligible to bill for services, the Fellow must:
 - a. Have and maintain a full and unrestricted Texas Medical License;
 - b. Have and maintain a personal DEA number;
 - c. Be board eligible or certified in his/her core specialty by the applicable member board of the ABMS;
 - d. Complete all paperwork required by the Houston Methodist Hospital Medical Staff Services Office.

Upon being appropriately credentialed by the Houston Methodist Medical Staff Services Office, Fellows in an Unapproved Program may bill for services in any provider setting within their boarded core specialty.

- E. Fellows may only bill for those services for which the fellow is privileged by the hospital to perform and for which they have been trained as part of their completed residency program. The department chair and fellowship program director are required to identify which procedures qualify for fellow billing, in coordination with the Houston Methodist Specialty Care Group Billing and Coding office. Programs must ensure that Fellows follow proper billing and coding procedures for those services billed outside of their fellowship training program.
- F. All revenue generated from a fellow billing pursuant to this Procedure shall belong to the department under which the fellow is employed. No such revenue shall be used to increase or otherwise affect a fellows stipend fellow as set forth in their current Agreement of Appointment.
- G. Notwithstanding the above, Residents and Fellows in programs that are ACGME-accredited residencies or those for which certification is available by a member board of the ABMS may not bill for any services provided within their respective residency or fellowship program, whether or not the physician is otherwise licensed to practice medicine in the state of Texas.

III. COMMITTEES REVIEWING/APPROVING PROCEDURE

- 1. Graduate Medical Education Committee [Approved on 11 August 2024]

IV. AUTHORITATIVE REFERENCES

- 1. BYLAWS OF THE MEDICAL STAFF OF HOUSTON METHODIST HOSPITAL (Approved June 23, 2021) Article 3.5.1