

	Policy Title	Clinical Fellow Billing Policy
	Document Number	3.08
	Department	Clinical Compliance
	Effective Date	
	Last Updated	March 21, 2022
	Clinical Compliance Committee Review Date	April 14, 2022

Purpose:

The purpose of this policy is to affirm internal guidelines regarding professional fee billing for services performed by individuals with the title of "Fellow" and align these with Center for Medicare and Medicaid Services (CMS) teaching physician rules.

Scope:

The scope and applicability of this policy includes all WCM representatives with professional fee billing responsibilities. The policy outlined in this document is a guide for teaching physicians, residents, fellows, and all those involved in the billing of any professional fee services related to these individuals.

Overview:

Within the faculty practice of Weill Cornell Medicine, the title of "Fellow" may be given to

- (a) Physicians who have completed their residency program who enrolled in a graduate medical education training program that is approved and recognized by the Accreditation Council for Graduate Medical Education (ACGME), or the American Board of Medical Specialties (ABMS) for an additional year of training, and therefore subject to the CMS teaching physician guidelines;

or

- (b) Physicians hired by and enrolled in a WCM clinical department sponsored training opportunity that is not recognized by the ACGME or ABMS as an approved graduate medical education program, and who have been given the appropriate clinical appointment and attending privileges by the WCM faculty practice and New York Presbyterian Hospital and therefore are eligible to bill for professional services.

Definitions:

Fellow: A fully credentialed, board-certified physician who has finished residency training and is pursuing more specialized training in their area of interest. Fellow training usually focuses on a narrow area of their specialty.

Resident: Post-graduate trainees with medical degrees, who are not fully credentialed or board-certified. An individual who participates in an approved graduate medical education program or a physician who is not in an approved GME program but who is authorized to practice only in a hospital setting (such as a physician credentialed/licensed in a foreign country). The term resident includes both interns and fellows in GME programs as approved for the purposes of direct GME payments made by the Fiscal Intermediary of CMS.

Teaching Physician: A physician (other than a resident) who involves residents in the care of his or her patients.

Teaching Physician Guidelines: A comprehensive set of rules issued by CMS to govern payment for physician services in teaching settings.

Policy:

Billing by Teaching Physician for ACGME/ABMS Fellows

Fellows who are enrolled in an ACGME approved program are hired as employees of New York Presbyterian Hospital and reported on their cost report. They are considered residents under the CMS Teaching Physician Rules. The services are billable by the teaching physician only when supervisory, personal participation, and documentation criteria are met.

Billing by Non-ACGME/Non-ABMS Fellows

Fellows who are not in an ACGME- or ABMS-approved training program are considered WCM Faculty Physicians and are **not** subject to the requirements for teaching physician supervision of the services they perform. Services of these Fellows are billed under the Fellow's name and NPI.

It is the hiring/sponsoring department's responsibility to ensure that Non-ACGME/Non-ABMS Fellows have a faculty appointment, have privileges at the NYP hospital where services will be rendered, and are credentialed for claims submission with Medicare, Medicaid, and managed care payers. These Fellows will be expected to practice under the rules of the WCM Professional Services Billing Compliance Program.

Contacts:

Direct any questions about this policy to the Clinical Compliance and Privacy Office (CPO):

- Telephone: (646) 962-6930
- Email: Compliance@med.cornell.edu

Reports of Non-Compliance:

Reports of non-compliance to this policy or any other compliance matter must be reported to the CPO:

- Telephone: (646) 962-6930
- Email: Compliance@med.cornell.edu
- OR via the Anonymous and Confidential Hotline: (866) 293-3077 OR www.hotline.cornell.edu

Policy Review:

The Compliance Department will review and update this Policy, when necessary, in the normal course of its review of the Organization's Compliance Program.

Policy Revision History:

TBD