

Topic: Billing for Fellows

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Fellows are defined in P&P 1925- Billing for Fellows and Cost Report Accounting as “A post residency trainee employed by the University of California and enrolled in a UCDCM post-residency secondary board training program, which may or may not be ACGME approved.

In order to ensure proper billing of all payors for services rendered by fellows, UCD Medical Group Professional Billing Group (PBG) reviews all fellows billing packets received from Human Resources and submits information to the Government Reimbursement Unit of Financial Services. The Government Reimbursement Unit determines if the fellow will or will not be claimed on the Medicare Cost Report and issues a memo to PBG, the fellow’s sponsoring department, and other departments as appropriate stating whether the fellow is billable or non-billable. Upon receipt of the memo, PBG sets up the fellow in the Signature billing system and, if the fellow is non-billable, establishes an edit to ensure charges to federal and state payors are not allowed.

Coding and billing staff must be knowledgeable of a fellow’s status (billable or non-billable) in order to determine appropriate coding and billing. Below are guidelines to assist coders in reviewing and coding for service rendered by billable and non-billable fellows.

BILLABLE FELLOWS

Billable fellows are enrolled in a training program that is not ACGME-approved and are not listed on the UCDCM Medicare Cost Report.

When a billable fellow provides services to a patient with a federal or state payor plan, the billing provider is determined as follows:

E/M Services

- When a fellow provides a service without the involvement of an attending/faculty physician and the attending/faculty physician cosigns or acknowledges the encounter in accordance with P&P 2307-Medical Records Documentation Standards, the service is billed under the fellow.
- When a fellow provides a service and discusses the case with an attending/faculty physician who does not see the patient and the attending/faculty physician adds or cosigns the note, the service is billed under the fellow.
- When a fellow provides an E/M service and an attending/faculty physician also sees the patient and documents in the medical record either by use of their own note or by linking language identifying their personal involvement in the care of the patient, the service is billed under the fellow **or** the attending/faculty physician in accordance with the department’s written protocol.

Note: As these billable fellows are not considered "residents" by Medicare for the purposes of the teaching physician rules, when billing under the attending/faculty physician, do not append modifier -GC. The ability to bill under either physician is supported by Medicare's guidance on billing for physicians in group practice (Pub. 100-04, Chapter 12, Section 30.6.5)

Diagnostic Tests

- When a fellow documents the interpretation and an attending/faculty physician simply cosigns it, the service must be billed under the fellow.
- When a fellow documents the interpretation and an attending/faculty physician personally reviews the images and documents their review and agreement with the fellow's interpretation or edits the fellow's interpretation, the service can be billed under either provider based on the department's protocol.

In these types of cases, the attending/faculty physician is performing the components of the service as he/she is personally reviewing the images and making their own interpretation.

Procedures

- When a fellow independently performs a separately billable procedure, the procedure must be billed under the fellow regardless of an attending/faculty physician's presence during the procedure.

Surgeries

- When a fellow acts as the primary surgeon, the surgery must be billed under the fellow regardless of an attending/faculty physician's presence during the surgery.
- When a fellow acts as an assistant surgeon with an attending/faculty physician as the primary surgeon, the fellow's service is billed as an assistant surgeon.

When a billable fellow provides services to a patient with a non-federal or state payor plan, the billing provider (fellow or attending) is determined in accordance with the department's written protocol based on applicable payor contractual provisions. At a minimum, in order to bill under an attending/faculty physician, the attending/faculty physician must co-sign the fellow's note.

NON-BILLABLE FELLOWS

Non-billable fellows are enrolled in an ACGME approved program, are listed on the UCDCM Medicare Cost Report and are considered residents under Medicare's Teaching Physician Rules. Services rendered by non-billable fellows are not billable to federal and state program payors.

When a non-billable fellow provides services to a patient with a non-federal or state payor plan, the billing provider (fellow or attending) is determined in accordance with the department's written protocol based on applicable payor contractual provisions. At a minimum, in order to bill under an attending/faculty physician, the attending/faculty physician must co-sign the fellow's note.