	Johns Hopkins School of Medicine Graduate Medical Education (GME) Policies and Forms	<i>Policy Number</i>	P&F029
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	<i>Subject</i> Professional Fee Billing Policy for Clinical Fellows in Accredited Programs	<i>Page</i>	1 of 3
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I. BACKGROUND

Federal regulations and the Medicare program have established rules governing the payment for services performed by clinical fellows who are in an approved training program based on the setting where the services are performed¹. Approved training programs include those clinical fellowship training programs approved by the Accreditation Council for Graduate Medical Education (ACGME) or the American Board of Medical Specialties (ABMS). Johns Hopkins Medicine (JHM) will follow the Medicare billing rules and some additional Hopkins-specific requirements for all payers unless a specific exception is granted for a specific payor or payors by the Senior Director, Office of Billing Quality Assurance.

¹ Includes 42 C.F.R. §413.86(b), §§415.200-208, and the Medicare Carriers Manual §2080.8.

II. POLICY

This policy applies to physicians who are clinical fellows in ACGME accredited Johns Hopkins Clinical Fellowship Training Programs.

III. DEFINITIONS


"Clinical Fellow" means a physician who has completed a core residency program and is eligible for board certification in that specialty and is enrolled in an accredited Johns Hopkins Training Program for a clinical subspecialty.

"Accredited Johns Hopkins Training Program" refers to a Johns Hopkins Clinical Fellowship Training Program that is accredited by the ACGME or ABMS and includes all accredited years of the Program, as designated by the Program Director; it does not include voluntary years of training in the same subspecialty or years subsequent to the final required year of the Program. It also does not include physicians with a faculty appointment in the School of Medicine.

"JHMI" means The Johns Hopkins Hospital, The Johns Hopkins Bayview Medical Center, Johns Hopkins Community Physicians/Johns Hopkins Medical Services Corporation, Howard County General Hospital, Suburban Hospital, Sibley Hospital and All Children's Hospital.

"Non-JHMI" means an institution other than one of the JHMI institutions.

"JHUSOM" means The Johns Hopkins University School of Medicine.

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“Participating Institution” means an institution to which training program physicians rotate in the physicians’ accredited Johns Hopkins Training Program.

“Training Program Physicians” or “Physicians” means Clinical Fellows in an Accredited Johns Hopkins Training Program when referred to collectively.


IV. INTRODUCTION

Whether a clinical fellow may bill for professional or patient care activities and what conditions apply to that billing activity depends on the location where the activities are rendered and the physician’s qualifications to provide that care. Set forth below are the five relevant locations and the billing policies applicable for each. These rules are summarized on Attachment B-1 to this Policy.

V. PROCESS

A. Billing Locations and Billing Policies for each Location:

1. JHMI/Hospital Setting.
 - a. Training Program Physician may bill for patient care activities in a JHMI hospital setting only if:
 - i. the activity is not in the same sub-specialty as his/her Johns Hopkins Training Program,
 - ii. the Physician does not admit patients, the Physician complies with the requirements of Attachment B-2 to this policy,
 - iii. the Physician has an approved Moonlighting Request Form (Attachment M to the Moonlighting Policy), and has an approved Professional Fee Billing Request Form (Attachment B-3 to this policy), and
 - iv. the physician has their own Maryland medical license.
2. JHMI/Non-Hospital Setting.
 - a. A Training Program Physician may bill for patient care activities in a JHMI non-hospital setting (such as a nursing home or physician’s office) only if:
 - i. the activity is not in the same sub-specialty as his/her Johns Hopkins Training Program.
 - ii. the Physician complies with the requirements of Attachment B-2 to this policy,
 - iii. the Physician has an approved Moonlighting Request Form (Attachment M to the Moonlighting Policy) and an approved Professional Fee Billing Request Form (Attachment B-3 to this policy), and
 - iv. the physician has their own Maryland medical license.
3. Non-JHMI/Participating Institution Hospital Setting.
 - a. A Training Program Physician may bill for patient care activities in a non-JHMI/Participating Institution Hospital setting only if:
 - i. the activity is not in the same sub-specialty as his/her Johns Hopkins Training Program,
 - ii. the activity takes place only in the emergency department or in an outpatient setting,
 - iii. the Physician does not admit patients,
 - iv. the Physician has an approved Moonlighting Request Form (Attachment M to the Moonlighting Policy) and an approved Professional Fee Billing Request Form (Attachment B-3 to this policy), and
 - v. the physician has their own medical license in the applicable jurisdiction.
4. Non-JHMI/Participating Institution Non-Hospital Setting.
 - a. A Training Program Physician may bill for patient care activities in a non-JHMI/Participating Institution non-hospital setting only if:
 - i. the activity is not in the same subspecialty as his/her Johns Hopkins Training Program,

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- ii. the Physician has an approved Moonlighting Request Form (Attachment M to the Moonlighting Policy) and an approved Professional Fee Billing Request Form (Attachment B-3 to this policy), and
 - iii. the physician has their own medical license in the applicable jurisdiction.
- 5. Non-JHMI/Non-Participating Institution - Hospital or Non-Hospital Setting.
 - a. A Training Program Physician may bill for patient care activities in a non-JHMI/Non-Participating Institution hospital or non-hospital setting only if the Physician has an approved Moonlighting Request Form (Attachment M to the Moonlighting Policy) and the physician has their own medical license in the applicable jurisdiction.