I. PURPOSE:
In some departments, there is educational value in allowing residents or fellows to perform some services and procedures without the physical presence of the attending physician as a resident or fellow nears completion of the program in order to allow the resident or fellow to achieve increasing levels of independence.

II. POLICY:

Government Payers: In the absence of specific contract provisions permitting billing of services of a resident or fellow who provides services without the presence or personal involvement of an attending physician, the UUHSC will comply with CMS standards concerning such billing. CMS generally prohibits billing for the services of a trainee without the presence and in some cases the personal involvement of the attending physician. University Medical Billing will put a hold on all claims to government payers when there is not a teaching attestation (attestation of the physical presence and/or involvement of a teaching physician during the service performed by a resident).

Commercial Payers: With respect to private commercial payers that have contractually agreed to allow billing for services performed by licensed residents and fellows in accredited programs, it is the policy of the UUHSC that such billing may take place provided that the services rendered in such cases by residents have been co-signed by a supervising physician.

Method: The University of Utah Healthcare Compliance Oversight Committee has designated the Epic One Chart electronic medical record and medical billing program as the approved mechanism for tracking co-signatures and teaching attestations associated with billing for services provided by residents.

APPROVAL BODY: Compliance Oversight Committee
APPROVAL DATE: 11/19/2010
POLICY OWNER: University Healthcare Billing Compliance Office

HISTORICAL INFORMATION
ORIGIN DATE: 03/16/2009