

Services by Unlicensed Residents and Medical Students Policy, Professional

IMPORTANT NOTE ABOUT THIS REIMBURSEMENT POLICY

This policy is applicable to UnitedHealthcare Medicare Advantage Plans offered by UnitedHealthcare and its affiliates.

You are responsible for submission of accurate claims. This reimbursement policy is intended to ensure that you are reimbursed based on the code or codes that correctly describe the health care services provided. UnitedHealthcare Medicare Advantage reimbursement policies use Current Procedural Terminology (CPT®*), Centers for Medicare and Medicaid Services (CMS), or other coding guidelines. References to CPT or other sources are for definitional purposes only and do not imply any right to reimbursement.

This reimbursement policy applies to all health care services billed on CMS 1500 forms. Coding methodology, industry-standard reimbursement logic, regulatory requirements, benefits design, and other factors are considered in developing reimbursement policy.

This information is intended to serve only as a general resource regarding UnitedHealthcare's Medicare Advantage reimbursement policy for the services described and is not intended to address every aspect of a reimbursement situation. Accordingly, UnitedHealthcare Medicare Advantage may use reasonable discretion in interpreting and applying this policy to health care services provided in a particular case. Further, the policy does not address all issues related to reimbursement for health care services provided to UnitedHealthcare Medicare Advantage enrollees. Other factors affecting reimbursement may supplement, modify or, in some cases, supersede this policy. These factors may include, but are not limited to: legislative mandates, the physician or other provider contracts, and/or the enrollee's benefit coverage documents**. Finally, this policy may not be implemented exactly the same way on the different electronic claims processing systems used by UnitedHealthcare Medicare Advantage due to programming or other constraints; however, UnitedHealthcare Medicare Advantage strives to minimize these variations.

UnitedHealthcare Medicare Advantage may modify this reimbursement policy at any time to comply with changes in CMS policy and other national standard coding guidelines by publishing a new version of the reimbursement policy on this website. However, the information presented in this reimbursement policy is accurate and current as of the date of publication. UnitedHealthcare Medicare Advantage encourages physicians and other health care professionals to keep current with any CMS policy changes and/or billing requirements by referring to the CMS or your local carrier website regularly. Physicians and other health care professionals can sign up for regular distributions for policy or regulatory changes directly from CMS and/or your local carrier. UnitedHealthcare's Medicare Advantage reimbursement policies do not include notations regarding prior authorization requirements.

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*** For more information on a specific enrollee's benefit coverage, please call the customer service number on the back of the member ID card.*

Application

This reimbursement policy applies to services reported using the 1500 Health Insurance Claim Form (a/k/a CMS 1500) or its electronic equivalent or its successor form. This policy applies to all products and all network and non-network physicians and other qualified health care professionals, including, but not limited to, non-network authorized and percent of charge contract physicians and other qualified health care professionals.

Policy

Overview

This policy describes the reimbursement of services rendered by unlicensed Residents, interns and medical Students as identified by the Healthcare Provider Taxonomy Code reported on the claim. This policy also addresses how reimbursement for services by unlicensed Residents, interns and medical Students will be considered when billed with

an appropriate modifier to indicate covered services were rendered under the direction of a Teaching Physician, or without the presence of a Teaching Physician under the Primary Care Exception.

Reimbursement Guidelines

Health Care Provider Taxonomy Code Set

According to the National Uniform Claim Committee (NUCC), the Health Care Provider Taxonomy code set levels are organized to allow for drilling down to the provider's most specific level of specialization. The ten-digit codes and categories are to be used exactly as they are assigned in the Taxonomy list.

The taxonomy code for medical Students is 390200000X, "Student in an Organized Health Care Education/Training Program." This code can be used by an individual who is enrolled in an organized health care education/training program leading to a degree, certification, registration, and/or licensure to provide health care. This code is reported on the CMS 1500 claim in Box 24J (servicing provider) or the electronic equivalent.

Consistent with CMS, UnitedHealthcare Medicare Advantage will not reimburse services rendered by unlicensed medical Students as identified by the Healthcare Provider Taxonomy Code reported on the claim and claims. Services performed by medical Students who do not fall within the scope of the CMS definition of "Intern or Resident" are not reimbursable. To be considered for reimbursement a Teaching Physician must re-perform the services and can then bill for those services under their own NPI.

Claim Submission Guidelines

Claims for services by unlicensed Residents and interns will be considered for reimbursement when appended with modifiers GC or GE. According to CMS, these modifiers indicate services were rendered in part by a Resident/intern under the direction of a Teaching Physician, or they were performed by a Resident without the presence of a Teaching Physician under the Primary Care Exception, respectively. Claims for services rendered by an unlicensed Resident/intern that do not include modifier GC or GE are not reimbursable and will be denied.

General Documentation Guidelines

Teaching Physicians must personally document that they performed the service or were Physically Present during key or critical portions of the service and their participation in the management of the patient. The physician may refer to the Resident's documentation; however, a statement by the attending (teaching) physician is required and must include independent documentation to correspond with the Resident/ 's documentation. Without such documentation, no reimbursement can be made.

Definitions

Physically Present	The teaching physician is located in the same room (or partitioned or curtained area, if the room is subdivided to accommodate multiple patients) as the patient and/or performs a face-to-face service.
Resident	An individual who participates in an approved graduate medical education (GME) program or a physician who is not in an approved GME program but who is authorized to practice only in a hospital setting
Primary Care Exception	An exception within an approved GME Program that applies to limited situations when the resident is the primary caregiver and the faculty physician sees the patient only in a consultative role (that is, those residency programs with requirements that are incompatible with a physical presence requirement). In such programs, it is beneficial for the resident to see patients without supervision to learn medical decision making.

Student	An individual who participates in an accredited educational program (for example, medical school) that is not an approved GME Program and who is not considered an intern or resident
Teaching Physician	A physician, other than an intern or resident, who involves residents in the care of their patients. Generally, for the service to be payable, they must be present during all critical or key portions of the procedure and immediately available to furnish services during the entire service.
Taxonomy Code	A taxonomy code is a unique 10-character code that designates your classification and specialization. To find the taxonomy code that most closely describes your provider type, classification, or specialization, use the National Uniform Claim Committee (NUCC) code set list.

Questions and Answers

1	<p>Q: What if a Teaching Physician is not involved with any part of a patient's care?</p> <p>A: No services may be reported on a CMS-1500 claim, as UnitedHealthcare Medicare Advantage is aligning with CMS on and after Jan. 1, 2022 and will not pay for services furnished by an unlicensed Resident/intern where a Teaching Physician was not involved with any part of the care (except in the case of the Primary Care Exception and these services would be reported with modifier GE).</p>
2	<p>Q: What happens when the unlicensed Resident/intern/medical Student becomes licensed?</p> <p>A: When the healthcare provider becomes licensed, they need to update their taxonomy code, after which this policy will no longer apply. Outreach to UnitedHealthcare Medicare Advantage is also necessary to update records/credentialing.</p>

Resources

www.cms.gov

Medicare Claims Processing Manual - Chapter 12 – Physician/Nonphysician Practitioners Section: 100 ,100.1.1

National Uniform Claim Committee (NUCC).

The Medicare Learning Network (MLN): MLN Matters MM10412 Revised, MLN Booklet ICN 006347

History

1/1/2022	Policy Implemented by UnitedHealthcare Medicare Advantage
11/3/2021	Policy approved by the UnitedHealthcare Medicare Advantage Stakeholders