Flowchart for Separately Billable Services of Fellows

APPENDIX to Policy B-407

Is the physician in a formal training program?

Yes

Does the physician have an unrestricted license to practice medicine in California?

Yes

Fellow’s Services are not separately billable

No

No

Physician is not a Fellow

No

Outpatient

Where are the services being performed?

Yes

Inpatient

At fellowship training site

No

Inpatient or Outpatient?

Inpatient

Fellow’s services are not separately billable

Outpatient

Services are not billed by USC.

Moonlighting activity must be approved in advance by the Fellowship Program Director.

“Moonlighting” at location outside of fellowship program

Yes

Is the training program an ACGME- or ABMS–approved fellowship training program potentially leading to certification?

Yes

Fellow’s services are separately billable as “internal moonlighting” only if:

(i) separately identified from services within the scope of the physician’s training program;

(ii) under a written agreement between USC and the Physician setting forth: (a) the services to be provided under the moonlighting arrangement; (b) that such services are outside of the scope of the Physician’s training program; and (c) that separate compensation will be provided to the Physician for the services;

(iii) within scope of USC credentialing;

(iv) non-fellowship activity is within the scope of billable services approved by USC Care

(v) service is not furnished to a patient previously seen by the fellow in the fellowship program for the same or related diagnosis or treatment plan as that for which the Fellow is rendering moonlighting services or as an inpatient in the training hospital;

(vi) if billing for assistant at surgery services, no qualified resident was available; and

(vii) meet any additional criteria set forth in Policy B407

NOTE: These “internal moonlighting” activities still count towards any ACGME resident hour limits.