

GME @ Dentons

Welcome to GME @ Dentons, a newsletter designed to provide you with monthly updates on issues related to **graduate medical education (GME)**.

Our DC-based team—

Holley Thames Lutz

and

Susan Banks

—regularly advise clients on all aspects of GME and write the GME @ Dentons newsletter to help you navigate the ever-evolving GME regulatory landscape.

Holley has, for more than a decade, represented a broad array of health care providers with respect to Medicare coverage and reimbursement issues, including those relating to graduate medical education. Finally, Susan's Medicare and Medicaid compliance and reimbursement consulting experience has a large GME component, including advising on GME-related contracting requirements in connection with the establishment of new medical and dental residency programs.

What can you expect from *GME @ Dentons*?

- Hot topics and insights into key developments in the complex world of GME reimbursement.
- Updates on proposed GME regulations and other guidance from the Centers for Medicare & Medicaid Services (CMS).
- Alerts and analysis regarding significant proposed GME legislation.

Showing 41 - 50 of Total Results (87)



Key contacts



Holley Thames Lutz

Partner,

Washington, DC

Washington, DC

D +1 202 408 6836

holley.lutz@dentons.com



Susan Banks

Partner,

Denver

Denver

D +1 303 634 4329

susan.banks@dentons.com



CMS issues new documentation rules for medical students

March 1, 2018



On February 2, 2018, the Centers for Medicare & Medicaid Services (CMS) revised the documentation requirements associated with medical student entries in the medical record.





GME Recommendations in the President's FY 2019 Budget Proposal

February 15, 2018



On February 12, 2018, the Trump administration released its Fiscal Year (FY) 2019 budget request. Published on an annual basis, presidential budget requests do not set the federal budget, but rather are "messaging" documents that generally play three roles in shaping federal policy.





Medicare and accrediting bodies may not always speak the same GME language

February 1, 2018



Medicare GME payment rules do not always align perfectly with developments in the residency program accreditation world. In light of recent and ongoing movement toward a single accreditation system (SAS), many clients have been asking questions about possible changes in the applicable Medicare rules governing what constitutes an "approved" program for GME payment purposes.





House of Representatives reintroduces resident rotator legislation

December 14, 2017



The US House of Representatives last week reintroduced a bill to help hospitals that accidentally established Medicare GME full-time equivalent (FTE) resident limits, or "caps," and/or per resident amounts (PRAs) based on small numbers of resident rotators. A Senate version of the same bill was introduced in June. The bills also address the problem of extremely low 1996 base-year caps.





Tying GME Funding to Quality Metrics

November 30, 2017



"Pay-for-performance" initiatives have become the norm within Medicare payment programs. However, Medicare funding for graduate medical education is still based on statutory formulae that are not linked to outcome or performance metrics. In a first-of-its-kind

request for public comment

, the Health Resources and Services Administration (HRSA) is now asking for feedback on structuring a "quality bonus system" for payments made under the Children's Hospitals Graduate Medical Education (CHGME) program. The deadline for written comments on HRSA's proposal is December 15, 2017.



The Teaching Health Center Graduate Medical Education Program: Overview, updates and future considerations

November 2, 2017



The Patient Protection and Affordable Care Act of 2010 (ACA) established the Teaching Health Center Graduate Medical Education (THCGME) program to expand training in community-based primary care

settings, particularly in rural and underserved areas. Originally, the ACA funded the THCGME program at \$230 million over five years (2011–2015). The Medicare and CHIP Reauthorization Act (MACRA, P.L. 114-10) provided \$60 million per year to extend the THCGME program through FYs 2016 and 2017 (this amount was reduced to \$55.9 million by the sequester). Threatened with the September 30, 2017, expiration of the THCGME program, Congress reauthorized funding through the first quarter of FY 2018 as part of a larger bill extending funding for the Federal Aviation Administration (P.L. 115-63 (9/29/17)). Many policy questions raised during the most recent reauthorization cycle remain to be addressed.



CMS issues new guidance on interim rates for new teaching hospitals

October 5, 2017





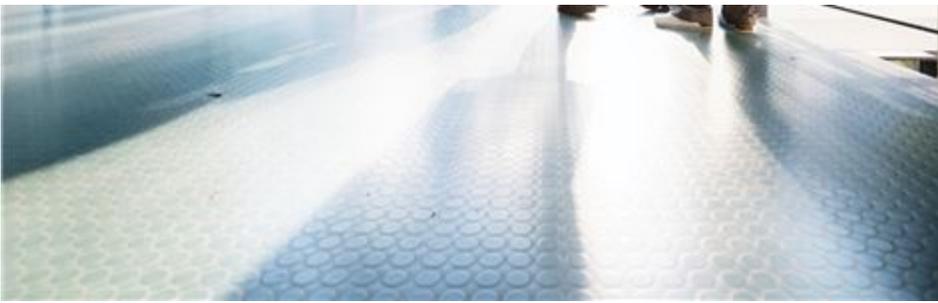
Prompted by confusion among Medicare Administrative Contractors (MACs) regarding how to initiate payments to new teaching hospitals, CMS issued on September 22, 2017, a One-Time Notification, Transmittal 1923, "Calculating Interim Rates for Graduate Medical Education (GME) Payments to New Teaching Hospitals ."



Emergency Medicare GME affiliation agreements

September 7, 2017





Hurricane Harvey, which is currently devastating the Houston area, reminds us that natural disasters and other emergencies outside a hospital's control may sometimes make it impossible for a teaching hospital to continue training residents until the situation is resolved. In such situations, Medicare's GME reimbursement rules allow a "home hospital" located in a presidentially declared emergency or disaster area to enter into an emergency Medicare GME affiliation agreement with a "host hospital." Under such an agreement, the home hospital lends its full-time equivalent (FTE) resident cap slots to the host hospital, so the host may receive GME reimbursement for training the home hospital's displaced residents.



Medicare Physician Fee Schedule payment for services furnished by residents jointly or under the supervision of a teaching physician

August 3, 2017





Medicare reimbursement for physician services in teaching settings is contingent on satisfying certain supervision and documentation requirements. This article addresses the Medicare Physician Fee Schedule payment requirements related to scenarios in which the resident performs elements required for a given service either jointly or in the presence of the teaching physician.



Key funding issues for provider-operated allied health residency programs

July 13, 2017





Medicare GME reimbursement is designed only to support the training of medical, dental and podiatric residents.

**How can the world's largest law firm help you today
?**

Contact us or find an office in your location.