Medicare Funding for Clinical Ethics Fellowships

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Federal Statute

• 42 CFR § 413.85(e) Approved nursing and allied health education programs. CMS will consider an activity an approved nursing and allied health education program if the program is a planned program of study that is licensed by State law, or if licensing is not required, is accredited by the recognized national professional organization for the particular activity, including but not limited to, the Commission on Accreditation of Allied Health Education Programs, the National League of Nursing Accrediting Commission, the Association for Clinical Pastoral Education Inc., and the American Dietetic Association.

• Training program must be clinical, students must work with patients
  • A non-clinical fellowship, or one primarily at a system office, would not count
Medicare Reimbursement Requirements

• The facility must (42 CFR § 413.85(e)):
  • Directly incur the training costs;
  • Have direct control of the curriculum;
  • Control program administration: collect of tuition, maintain staff and student payroll, and day to day program operation;
  • Employ the teaching staff; and
  • Provide and control classroom instruction and clinical training.

• Medicare pass through reimbursement:
  • Based in part on students’ clinical hours and percentage of Medicare patients at the facility
  • Doesn’t cover 100% of costs but can cover most, including student stipends and faculty salary
Recognized National Professional Organization

- ASBH
  - “ASBH should consider establishing a Council to accredit educational programs (e.g., graduate, fellowship, or certificate programs) that use the ASBH Core Competencies as a baseline for CEC knowledge and skill development.”

- ACPE (Association of Clinical Pastoral Education)

- ABPD (Association of Bioethics Program Directors)

- Others?

- Regardless of the organization, it benefits all of us to pursue this as a funding opportunity