UW Health Medical Student Documentation Guidelines

Effective July 2018

I. Background

CMS revised the Teaching Physician section of the Medicare Claims Processing Manual regarding utilizing student documentation for billing as follows:

100.1.1 - Evaluation and Management (E/M) Services

B. E/M Service Documentation Provided by Students

Any contribution and participation of a student to the performance of a billable service (other than the review of systems and/or past family/social history which are not separately billable, but are taken as part of an E/M service) must be performed in the physical presence of a teaching physician or physical presence of a resident in a service meeting the requirements set forth in this section for teaching physician billing.

Students may document services in the medical record. However, the teaching physician must verify in the medical record all student documentation or findings, including history, physical exam and/or medical decision making. The teaching physician must personally perform (or re-perform) the physical exam and medical decision making activities of the E/M service being billed, but may verify any student documentation of them in the medical record, rather than re-documenting this work.

II. Definitions

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. The term includes interns and fellows in GME programs recognized as approved for purposes of direct GME payments made by the FI. Receiving a staff or faculty appointment or participating in a fellowship does not by itself alter the status of "resident". Additionally, this status remains unaffected regardless of whether a hospital includes the physician in its full time equivalency count of residents.

Student - An individual who participates in an accredited educational program (e.g., a medical school) that is not an approved GME program. A student is never considered to be an intern or a resident. Medicare does not pay for any service furnished by a student. See §100.1.1B for a discussion concerning E/M service documentation performed by students.

Teaching Physician - A physician (other than another resident) who involves residents in the care of his or her patients.
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.

III. Guidelines

The following are the requirements related to the use of medical student documentation for the billing of E/M codes:

A. Medicare does not pay for services performed by medical students; however, medical students may participate in the documentation of Evaluation and Management (E/M) services teaching physicians use for billing.

B. The medical student documentation used to support a billable service must represent the teaching physician’s personal performance of all E/M elements.

C. For use of medical student documentation, either a resident or a teaching physician must be physically present with the medical student for the HPI, physical exam and medical decision making.

D. For use of medical student documentation, the teaching physician must verify the history and perform the physical exam and medical decision-making activities of the E/M service being billed.

E. To use medical student documentation for billing, the “Cosign/Addend” Healthlink button should be used to allow for editing of the note. The teaching physician/resident must verify any student documentation in the medical record by adding an attestation such as:

Example 1 – Teaching Physician present with medical student and performing all physical exam and decision making that is documented:

TPmedstudattest
I was present with the medical student. I have edited this note as necessary to reflect the history, physical examination and medical decision making I have performed and deem medically necessary.

Example 2: Resident present with medical student, teaching physician verifies history, performs all physical exam and decision making that is documented (Both resident and TP must add separate attestations - resident as being present and TP for performance of the documented PE and medical decision making):

Resident attestation:
resmedstud
I was present with the medical student. I have edited this note as necessary to reflect our findings.
AND

Teaching physician attestation:
.TPresmedstudattest

I have edited this note as necessary to reflect the history, physical examination and medical decision making I have performed and deem medically necessary.

F. The teaching physician is ultimately responsible for the accuracy and medical necessity of the documentation and level of service billed.

G. Teaching physicians still may choose to use their own documentation for billing purposes. The TP can attest to a medical student note as “educational purposes only” by using the “Note Reviewed/Attest” button in Healthlink and by adding the following: .medstud

This note is intended for educational purposes only. Please see my note from the same date for my history, physical exam, assessment and plan.

H. Teaching Physicians may choose to have their residents continue to write their own notes allowing the TP to perform the key portions and use their current resident attestation. A resident cannot copy and paste a student note as their own.

IV. Limitations

A. These guidelines apply only to Evaluation and Management services.

B. These guidelines do not apply to APPs and APP students.