

E/M Student Documentation

Have You Heard?

- CMS revised its policy toward E/M Service Documentation Provided by Students for 2018
- The **UWP** implementation date for this change is September 1, 2018

Did You Know?

- This revision is for evaluation and management (**E/M services only – not procedures**)
- Services must be performed in the physical presence of the teaching physician or resident
 - If the resident edits and/or adds to the documentation of a medical student's E/M note, the usual teaching physician rules ("key and critical") for residents do not apply, instead only the rules regarding medical student's participation apply. (see FAQ)
- The teaching physician must verify all student documentation or findings, including history, 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
- Refers to medical students and teaching physicians only – no ARNP, PA, or any other student work may be used

Teaching Physician policies have been revised to reflect this change

There are three basic scenarios:

Scenario 1: The Teaching Physician is present with the medical student for the E/M service

The TP is present while the medical student performs the history of present illness, the physical exam and medical decision making. The TP must re-perform the exam and medical decision making and verify the history of present illness. The teaching physician can then verify* and attest to the medical student's documentation.

*Verify – make sure or demonstrate the documentation is true and accurate. This includes editing as needed.

Scenario 2: The medical student sees the patient first without the TP or resident present

If the medical student sees the patient first alone, the medical student must be present throughout as the teaching physician later confirms the history with the patient. The student must also be present as the TP performs their physical exam and articulates their medical decision making. The TP can then verify and attest to the medical student's documentation.

Scenario 3: The resident is present with the medical student for the E/M service

If a resident and a medical student see the patient together without the teaching physician, and the medical student writes the note, the teaching physician must again repeat or confirm the entire patient history, perform the physical exam and express their medical decision making (with or without the medical student). Only then can the TP use the medical student's note, again after verifying and attesting to it. The resident will attest to their presence with the medical student.

Resources:

CMS Pub 100-04 Medicare Claims Processing Manual, Chapter 12, 100.1.1



R3971CP.pdf

MLN # MM10412

<https://www.cms.gov/Outreach-and-Education/Medicare-Learning-Network-MLN/MLNMattersArticles/Downloads/MM10412.pdf>

UWP Teaching Physician Policy E/M

<https://one.uwmedicine.org/sites/uwp/PP/Policies/Teaching%20Physician%20Presence%20and%20Documentation%20-%20Evaluation%20and%20Management%20Services.pdf>

Tools:

EHR SmartPhrases:

Teaching Physician Present with Medical Student

(Scenario 1 and 2)

Epic – ATTMSCOMPLETE ORCA = Att Stmt – Med Student Complete

I was present with medical student for the service. I personally verified the history of present illness and performed the physical examination and medical decision making. I have verified all of the medical student's documentation for this encounter.

Resident Present with Medical Student

(Scenario 3) (Resident Attestation)

RESMEPRESENCE Epic and ORCA

I was present with the medical student for the service.

Teaching Physician Verify (uses) Medical Student Documentation

(Scenario 3)

Epic – ATTMSVERIFY ORCA = Att Stmt – Med Student Verify

I personally verified the history of present illness and performed the physical examination and medical decision making. I have verified all of the medical student's documentation for this encounter.

Quick Guide: Medical Student Participation in E/M Services

E/M element	May the medical student perform and document the E/M element?	Is teaching physician (or resident) <i>presence with the medical student</i> required for billing the service?	Is the teaching physician required to personally <i>verify*</i> the medical student's note?	Is the teaching physician required to personally <i>(re)perform</i> the service?
Chief Complaint	Yes	Yes	Yes	No
History of Present Illness (HPI)	Yes	Yes	Yes	No
Past, Family, and Social History (PFSH)	Yes	No	Yes	No
Review of Systems (ROS)	Yes	No	Yes	No
Physical Exam (PE)	Yes	Yes	Yes (must also personally perform)	Yes
Medical Decision Making (MDM)	Yes	Yes	Yes (must also personally perform)	Yes

**Verify – make sure or demonstrate the documentation is true and accurate. This includes editing as needed.*