

Revised CMS standard regarding medical student, PA, NP documentation

“Students (medical student, physician assistant, nurse practitioner student = provider level 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.”**

Scenarios that meet the standard

Attending physician or resident physician directly observes the student performing the history and physical exam

- Time permitting, the attending or resident physician directly observes the student interaction with the patient and simply re-performs the key elements of the physical exam.
- This direct observation is optimal for feedback purposes, but not always feasible.
- When directly observed, only the key elements of the physical exam need to be re-performed by the observing physician.
- Student documentation can simply be verified in the record in this scenario.

Student Presents in Front of Patient

- If not able to directly observe the student-patient interaction, you can have the student present their findings directly in front of the patient
- This allows the patient to confirm the history
- The attending physician then re-performs key elements of the physical exam in the room with the patient
- The attending physician is then directly involved with the medical decision making
- This works in the outpatient clinics as well as on rounds in the hospital

Student Does NOT Present in Front of Patient

- If the student is not directly observed performing the history taking and physical exam, and the presentation is not in front of the patient, therefore there is no opportunity for confirming the history in this scenario.
- In this scenario, the attending physician must re-perform the history and the physical exam in their entirety.
- Student documentation can still be utilized after the attending physician re-performs all elements of the history and physical exam.

Remember

- Student documentation CANNOT be used for:
 - Surgeries
 - Procedures
 - History & Physicals (eg. admission H & Ps, new patient visits)
 - Discharge summaries



What a
GREAT
opportunity!