

## To-Do List for Implementing the CMS 2018 Manual Change Regarding the Use of Student Documentation by the Teaching Physician for Billing Purposes

In an effort to reduce the burden placed on teaching physicians by the Medicare documentation requirements, CMS recently made changes to the teaching physician billing rules. The teaching physician is now able to use medical student documentation, including history, physical exam and/or medical student decision making provided that he/she personally performs or re-performs the physical exam and medical decision making of the evaluation and management service and verifies the student's documentation. The AAMC actively supported this effort and will continue to work with CMS to reduce unnecessary burdens.

The AAMC is working with members, other associations, and CMS to ensure that these changes are correctly and consistently understood. In the meantime, below is a suggested checklist to help you determine how to best implement this change in your institution.

1. Determine who in your organization needs to be involved:
  - a. Medical staff leadership
  - b. Legal Counsel
  - c. Designated Institutional Official
  - d. Chief Academic Officer
  - e. Clerkship directors
  - f. Others at the medical school
  - g. Compliance office
  - h. Revenue cycle for billing/coding
  - i. IT for changes to EHR access for students
2. Are medical student notes considered as part of the medical-legal record? If no:
  - a. Must revise medical staff by-laws, rules, and regulations and have changes approved
3. Do students have appropriate access in your electronic medical record?
4. Will you apply this change to notes by all students, M3-M4 students, or limit it to students who have achieved a certain level of competence?
5. Have medical students been taught and assessed on how to write good notes?
6. Have you educated teaching physicians (both AMC-based and community-based), residents, and medical students on the rules of the road?
7. Consider the implications for resident documentation, keeping in mind that the teaching physician billing rules must be followed. Note that the AAMC will be working with CMS to get more information.
8. What is the time line for implementing the change?
9. What are your plans for monitoring compliance once the change is in place?

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