

Student Documentation in EHRs

Physicians cannot get paid for services rendered by a student, but a student can participate in and document visits. The teaching physician must verify the notes made by students.

What Does CMS Say?

E/M Service Documentation Provided by Students

Any contribution and participation of students 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.

Medical Record Documentation

The physician may review and verify (sign/date), rather than re-document, notes in a patient's medical record made by physicians; residents; nurses; medical, physician assistant, and advanced practice registered nurse students; or other members of the medical team including, as applicable, notes documenting the physician's presence and participation in the services.

Sample Scenarios for Student Documentation

These were proposed to CMS by the Society of Teachers of Family Medicine based on STFM's interpretation of the guidelines.

Scenarios were taken from <https://www.cms.gov/Regulations-and-Guidance/Guidance/Transmittals/2018Downloads/R4068CP.pdf> but edited for inclusion of students and/or students and residents and the changes in Transmittal R4283CP, dated August 26, 2019.

Scenario 1: The teaching physician personally performs all the required elements of an E/M service without a student. In this scenario the student may or may not have performed an E/M service independently. In the absence of documentation by a student, the teaching physician must document as he/she would document an E/M service in a non-teaching setting.

Scenario 2: The student performs the elements required for an E/M service in the presence of, or jointly with, the teaching physician and the student documents the service. The teaching physician performs or re-performs the HPI and the physical exam, and participates in the medical decision making. The teaching physician verifies* the student's entry in the patient's record. For payment, the composite note must support the medical necessity and the level of the service billed by the teaching physician.

Scenario 3: The student performs some or all of the required elements of the service in the absence of the teaching physician and documents in the patient record. The teaching physician independently performs the HPI, the physical exam, and medical decision making with or without the student present. The teaching physician verifies* the student's entry in the patient's record. For payment, the composite note must support the medical necessity and the level of the service billed by the teaching physician.

Scenario 4: The student performs some or all of the required elements of the service in the presence of, jointly with, or in the absence of the resident and documents in the patient record. The resident performs some or all of the required elements of the service in the absence of the teaching physician with or without the student present. The resident verifies* the student's entry in the patient's record and attests that he/she (the resident) performed the required elements of the service. The teaching physician independently performs the critical or key portions of the service and participates in the management of the patient. The teaching physician verifies* the composite entry in the patient's record. For payment, the composite note must support the medical necessity and the level of the service billed by the teaching physician. Scenario 5: The student performs some or all of the required elements of the service in the presence of, jointly with, or in the absence of the resident and documents in the patient record. The resident performs some or all of the required elements of the service in the presence of, or jointly with the teaching physician with or without the student present. The resident verifies* the student note and attests that he/she (the resident) performed the required elements of the service. The teaching physician verifies* the composite entry in the patient's record. For payment, the composite note must support the medical necessity and the level of the service billed by the teaching physician.

*Verify: review and ensure the documentation is true and accurate. This includes editing as needed.