



Compliance Guidance on Recent CMS Update on Evaluation and Management (E/M) Services Documentation Provided by Medical Students

➤ **Question 1: What is the major change?**

Answer: CMS has changed the documentation requirements which now allows teaching physicians to use ***all*** student documentation for billable services provided that the physical presence requirements are met, the teaching physician satisfies the performance requirement and verifies the documentation. Previously, the only portion of the students' documentation that was permitted for billing purposes was the Review of Systems (ROS) and the Past, Family and Social History (PFSH).

➤ **Question 2: What are the physical presence requirements?**

Answer: Any contribution and participation of a student to the performance of an E/M billable service (other than the review of systems and/or past, family and social history) **MUST** be performed in the physical presence of a teaching physician or physical presence of a resident.

➤ **Question 3: What are the performance requirements?**

Answer: The teaching physician must personally perform (*or re-perform*) the physical exam and medical decision making of the E/M service being billed. The teaching physician no longer needs to re-document these elements but rather they must verify in the medical record all student documentation or findings, including history, physical exam and/or medical decision making.

➤ **Question 4: Does this mean that a medical student can now act as a scribe?**

Answer: No. This rule change does not address the use of medical students as scribes. The scribe rules are very different. Please refer to our scribe policy for further guidance.

➤ **Question 5: Does this update apply to Nurse Practitioner (NP) and Physician Assistant (PA) students too?**

Answer: No. This update does not apply to NP and PA students. The update was intended for medical students only.

➤ **Question 6: Does this change apply to all Evaluation and Management (E/M) Services?**

Answer: No. This does not apply to all E/M services. Please see the attached appendix A for a listing of those E/M services that are permitted and not permitted for this new rule change.

➤ **Question 7: Are there any Epic Smartphrases available to assist the teaching physician?**

Answer: We have created two different Epic Smartphrases to assist the teaching physician with the documentation requirements. **.attmedicalstudentonly** is for encounters when the teaching physician is working with a medical student only and **.attmedicalstudentwithresident** is for encounters when the teaching physician is working with a medical student and a resident.



➤ **Question 8: Has the language in the Professional Services General Standard policy changed?**

Answer: Yes. We have made the necessary changes. Please see section III Process/Procedures, subsection S. Additional Documentation for the revised language.

➤ **Question 9: Will there be any education efforts by the Compliance Office?**

Answer: Yes. The Compliance Office has created educational tools including this FAQ document, Epic Smartphrases, updates to our general standard policy and we will be providing education during routine meetings and presentations with the clinical departments and divisions that we support.

➤ **Question 10: Who should I contact if I have additional questions and/or would like to request education?**

Answer: Please contact Theresa Kullman, Director, Professional Services Billing Integrity at (650)-498-6108 or tkullman@stanfordhealthcare.org or Sunita Rangwala, Manager, Professional Services Billing Integrity at (650) - 736-1051 or srangwala@stanfordhealthcare.org



Epic Smartphrases for Compliance Guidance on Recent CMS Update on Evaluation and Management (E/M) Services Documentation Provided by Medical Students

.attmedical	
Abbrev	Expansion
☆ ATTMEDICALSTUDENTONLY	Teaching Attestation: Med Student Only I was present with the me...
☆ ATTMEDICALSTUDENTWITHRESIDENT	Teaching Attestation: BOTH Med Student and Resident I and/or th...

➤ **SCENARIO #1: TEACHING PHYSICIAN WORKING WITH A MEDICAL STUDENT ONLY**

Epic Smartphrase: .attmedicalstudentonly

Teaching Physician Attestation:

I was present with the medical student who participated in the documentation of this note. I personally performed the physical exam and medical decision making. I have reviewed and agree with all the medical student documentation including the history, exam, medical decision making and findings, with the addition and/or exception of items documented below.

@ME@

➤ **SCENARIO #2: TEACHING PHYSICIAN WORKING WITH A MEDICAL STUDENT AND A RESIDENT**

Epic Smartphrase: .attmedicalstudentwithresident

Teaching Physician Attestation:

I and/or the resident were present with the medical student who participated in the documentation of this note. I personally performed the physical exam and medical decision making. I have reviewed and agree with all of the medical student and resident documentation including the history, exam, medical decision making and findings, with the addition and/or exception of items documented below.

@ME@

APPENDIX A

CPT Listing for Medical Students

Standard E/Ms (Permitted)

OUTPATIENT

99201-99205 New Patient Office Visits
99211-99215 Established Patient Office Visits
99241-99245 Office Consultations
99381-99387 New Patient Preventive Medicine
99391-99397 Established Patient Preventive Medicine

INPATIENT

99221-99223 Initial Hospital Care
99231-99233 Subsequent Hospital Care
99251-99255 Inpatient Consultations
99238-99239 Hospital Discharge Services

OBSERVATION

99218-99220 Initial Observation Care
99224-99226 Subsequent Observation Care
99217 Observation Discharge Care

OBSERVATION OR INPATIENT

99234-99236 Observation or Inpatient (Admission and Discharge on the same date)

ER

99281-99285 Emergency Department Services

NURSING FACILITY SERVICES

99304-99306 Initial Nursing Facility Care
99307-99310 Subsequent Nursing Facility Care
99315-99316 Nursing Facility Discharge Day Management
99318- Other Nursing Facility Services

DOMICILIARY, REST HOME, or CUSTODIAL CARE SERVICES

99324-99328 New Patient Domiciliary or Rest Home Visits
99334-99337 Established Patient Domiciliary or Rest Home Visits

HOME SERVICES

99341-99345 New Patient Home Visits
99347-99350 Established Patient Home Visits

APPENDIX A

More Complex E/Ms (NOT Permitted)

PROLONGED SERVICES

99354-99359 Prolonged Services (with and without direct patient contact)

MEDICAL TEAM CONFERENCES

99366-99368 Medical Team Conferences (with and without direct patient and/or family contact)

CARE PLAN OVERSIGHT

99374-99375 Supervision of patient under home health agency

99377-99378 Supervision of a hospice patient

99379-99380 Supervision of nursing facility patient

CRITICAL CARE SERVICES

99291-99292 Critical Care

99466-99486 Pediatric Critical Care Patient Transport

99468-99476 Neonatal and Pediatric Critical Care

INTENSIVE OBSERVATION

99477-99480 Initial and Continuing Intensive Care Services

CHRONIC CARE MANAGEMENT

99490 Chronic Care Management

COMPLEX CHRONIC CARE MANAGEMENT

99487-99489 Complex Chronic Care Management

PSYCHIATRIC COLLABORATIVE CARE MANAGEMENT

99492-99494 Initial or Subsequent psychiatric collaborative care management

TRANSITIONAL CARE MANAGEMENT

99495-99496 Transitional Care Management services

ADVANCE CARE PLANNING

99497-99498 Advance Care Planning