

Re: Use of Medical Student Documentation for E/M Billing

In an effort to decrease administrative burden, CMS recently ruled that providers may use medical student documentation for E/M billing. Beginning May 14, Epic will be updated to allow additional student documentation and billing from their notes.

The rule has very specific requirements for using student documentation, which are different from resident documentation. Please review the requirements below and the recommended workflows in Epic for the inpatient and ambulatory settings.

- The attending or resident must personally **verify, update, and/or edit** all of the student's documentation, including all history and medical decision making.
- In addition, the attending or resident must **personally perform or re-perform** the documented physical exam (may verify, but not required to re-document.)
- The attending physician or resident must be physically present to verify all student documentation and re-perform the exam.
- Residents may use student documentation, but the resident must supervise the student and adhere to the same requirements as noted above.
- Medical student documentation may be used for H&P, Progress Notes, Consults, and Discharge Summaries with appropriate attestation. Medical student documentation of Procedure/Op Notes may **not** be used for billing and will require re-documentation.

Only the approved attestation statement (.STUDENTATTEST) should be used in all clinical settings.

Note:

- Use of medical student documentation for billing purposes is optional. Attendings may continue to use their own note or attest a resident's note, and allow students to write a separate, independent note.
- This workflow does not apply to nurse practitioner students, physician assistant students, nurse practitioners, or physician assistance.

Ambulatory

Attending with Student (no resident)

Student begins Progress Note
 ↓
 Attending re-performs exam and verifies all documentation
 ↓
 Attending opens student's note, chooses "Make Me the Author", and makes any edits
 ↓
 Attending inserts attestation at end of note
 ↓
 Attending signs encounter at conclusion of visit after confirming all elements for billing compliance

Attending with Resident & Student

Student begins Progress Note
 ↓
 Resident re-performs exam and verifies all documentation
 ↓
 Resident opens student's note, chooses "Make Me the Author", and makes any edits
 ↓
 Resident inserts attestation at end of note
 ↓
 Attending signs and attests the **encounter** at conclusion of visit after confirming all elements for billing compliance (GC/GE Rules still apply)

Inpatient

Attending with Student (no resident)

Student begins note (Progress/H&P/Consult) and assigns to **attending**
 ↓
 Attending re-performs exam and verifies all documentation
 ↓
 If no edits, select "Attest" button and inserts **student** attestation
 ↓
 If edits are needed, open note and edit, then insert attestation

Attending with Resident & Student

Student begins note (Progress/H&P/Consult) and assigns to **resident**
 ↓
 Resident re-performs exam and verifies all documentation
 ↓
 Resident opens note, edits as needed, inserts attestation, and assigns to attending
 ↓
 Attending selects "Attest" button and inserts **resident** attestation

Note: if the attending will not use the student note for billing, the resident may simply "cosign" the student note.