

<b>Responsible Office:</b>	Yale Medicine	<b>Effective Date:</b>	1/1/2018
<b>Responsible Department:</b>	Medical Billing Compliance	<b>Last Revision Date:</b>	10/18/2018

## Medical Student Documentation for Billing Purposes

Policy Statement .....	1
Procedures.....	1
Authority to Grant Medical Student Privilege to Document in Epic .....	1
Epic .....	1
Contacts.....	2

### Policy Statement

CMS publication MM10412 (March 2018) revised the Medicare Claims Processing Manual to allow the teaching physician to verify in the medical record any student documentation of components of Evaluation and Management (E/M) services, rather than being required to re-document the work.

The policy states that any participation of a medical student in a billable service must be performed in the presence of the teaching physician. The teaching physician, if present with the medical student, can verify student documentation in the record. The teaching physician does not necessarily have to rewrite everything, and can acknowledge its accuracy in the record. However, the teaching physician must still personally perform or re-perform the exam and decision-making activities of the service being billed when services are performed by a student in their presence.

This policy only applies to medical students. It does not apply to any other types of students including APRN, PA, nurse midwife, audiology, or speech students. This policy only applies to E/M services. It does not apply to diagnostic procedures, medical procedures or surgeries.

This policy applies to Clerkship students and Advanced “Sub I” and Elective students. <sup>1</sup>

Clerkships are the required clinical rotations that all medical students must take. These are the first clinical rotations and are done from January of the second year of medical school until December of the third year. Sub-internships and electives are taken following the clerkship year. These are taken by subsets of the students depending upon their interests and the field they plan to apply in for residency or fellowship. In a Sub-internship students engage in a clinical rotation in which, with appropriate supervision, they assume primary patient care responsibility at the highest appropriate level possible within the specialty area, directly interfacing with the patient, the medical team, the nursing staff, and any other services. They are totally immersed in day-to-day activities, tasks, and responsibilities of patient care and have a level of independence appropriate to a 4th year medical student. In a Clinical Elective, medical students engage in a clinical rotation in which, with appropriate supervision, they participate in the care of patients as an adjunct to a primary clinician (usually a fellow or resident) on a service. The student may interface with the patient, medical team, nursing staff, and other services. In Electives the student gains exposure to and participates in day to day activities, tasks, and responsibilities of patient care on the service. Electives are an opportunity for exposure to sub-specialty areas of medicine which will enhance student's knowledge base and experience.

## Procedures

### Authority to Grant Medical Student Privilege to Document in Epic

Supervisors, Clerkship Directors and attending on service are authorized to confirm when a medical student is approved to document E/M notes in Epic that will contribute to a billable service.

### Epic

#### Medical Student Epic Access

Medical students have access to Epic beginning with their clinical years and can document and pend (non-active) orders as well as review results and read notes. Based on CMS MM10412, medical students will have access to physician templates.

### Smartphrase

The following smartphrase should be used by the teaching physician when observing a medical student provide an E/M service.

.studentmdattest

"I was present when the medical student completed E/M related services with the patient and have personally performed or re-performed the exam and plan. I have verified and/or revised the medical student documentation for accuracy. Of note \*\*\*"

### Contacts

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### References:

CMS MLN Matters 10412 <https://www.cms.gov/Outreach-and-Education/Medicare-Learning-Network-MLN/MLNMattersArticles/Downloads/MM10412.pdf>

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