

Subject: YM Medical Student Documentation and Billing Policy

Date: Monday, December 3, 2018 at 12:30:45 PM Eastern Standard Time

Yale Medicine

Dear Colleagues,

Effective January 2018, the Centers for Medicare & Medicaid Services (CMS) allows teaching physicians to verify in the medical record any medical student documentation of components of Evaluation and Management (E/M) services, rather than being required to re-document the work if the medical student is providing the care in the presence of the teaching physician. However, the policy still requires that the teaching physician 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.

The attached [YM Medical Student Documentation and Billing Policy](#) provides instructions regarding medical students and teaching physicians.

Yale Medicine is aware that CMS publication CR 10412 includes language about students evaluating patients in the physical presence of a resident. However, because there is ambiguity about this practice from a billing compliance perspective, Yale Medicine will only allow participation of a medical student in a billable service when performed in the presence of the teaching physician at this time.

Please contact Judy Harris, CPC, Director of Medical Billing Compliance, at (203) 785-3868 or judy.harris@yale.edu if you have any questions.

Sincerely,

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- Richard Belitsky, MD, Deputy Dean for Education

- Joshua Copel, MD, Associate Chief Medical Officer
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- Alyssa Greenwald, Esq., Associate General Counsel
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