# Are teaching physicians required to re-document the EHR work of students?

## DEBUNKING THE MYTH

Teaching physicians are not required to re-document medical students' documentation of E/M components of a patient visit. Rather, they can simply verify these entries with a signature and date.[1]

## BACKGROUND

In February 2018, CMS documentation requirements changed, allowing teaching physicians to verify in the medical record student documentation of components of E/M services rather than re-documenting this work provided that the physician (1) is physically present and (2) personally performs (or re-performs) the physical exam and medical decision-making activities of the E/M service being billed.[2]

### Key takeaway

The use and verification of medical student notes can decrease physician documentation burden and improve the practical application of medical students' education.

### Success Story

After changes to CMS documentation requirements went into effect, Stanford Children's Health implemented medical student documentation. As a result, attending physicians' interactions with student notes significantly increased from 4% of student notes reviewed to 84%. Further, students reported that implementation of this change enhanced their learning and made their notes more meaningful.[3]

Additionally, a January 2018 survey of preceptors revealed that approximately 92% believed that student documentation would save them time after clinic. Specifically, almost 50% (48.3%) reported this change would save them between 31-60 minutes per half-day session.[4]

### AMA policy

Medical Student Access to Electronic Health Records H-315.969

CMS Documentation Guidelines for Teaching Physicians H-315.982

### Resources

- **CMS MLN Fact Sheet:** Complying with Medicare Signature Requirements. Accessed November 2024.
- **CMS MLN Matters Article:** E/M Service Documentation Provided by Students. Accessed November 2024.
- **CMS Claims Processing Manual**: E/M Service Documentation Provided by Students. Accessed November 2024.
- **AMA STEPS Forward® Playbook**: Reducing Regulatory Burden. Accessed November 2024.
- **AMA STEPS Forward Playbook**: Simplified Outpatient Documentation and Coding. Accessed November 2024.

### References

1. Centers for Medicare and Medicaid Services. Complying with Medicare Signature Requirements. *MLN Fact Sheet;* 2024. **https://www.cms.gov/files/document/mln905364-complying-medicare-signature-requirements.pdf**
2. Centers for Medicare & Medicaid Services. Pub 100-04 Medicare Claims Processing: Transmittal 4068. *CMS Manual System. Change Request 10412*; 2018. **https://www.cms.gov/Regulations-and-Guidance/Guidance/Transmittals/2018Downloads/R4068CP.pdf**
3. Stevens LA, Pageler NM, Hahn JS. Improved Medical Student Engagement with EHR Documentation following the 2018 Centers for Medicare and Medicaid Billing Changes. *Applied Clinical Informatics. 2021;12(03):582-588. doi:*10.1055/s-0041-1731342
4. Society of Teachers of Family Medicine (STFM). FAQs: New E/M Service Documentation Provided by Students requirements included in Transmittal 4068; May 31, 2018. **https://www.stfm.org/media/1360/new-em-service-documentation-provided_may2018.pdf**