



STUDENT DOCUMENTATION

Must teaching physicians re-document the EHR work of students?

Medical student documentation is the process of medical students documenting clinical services, including history, physical exam and/or medical decision making, in a patient's electronic medical record. Historically, the teaching physician was required to re-document the medical student's entries.

The Centers for Medicare and Medicaid (CMS) issued revised guidance on medical student documentation on Feb. 2, 2018.

DEBUNKING REGULATORY MYTHS

AMA's regulatory myths series provides administrative leaders and physicians with resources to reduce guesswork and administrative burdens so their focus can be on improving patient outcomes, streamlining clinical workflow processes, and increasing physician satisfaction.

THE MYTH

Teaching physicians are required to re-document medical student entries in the patient record.*

DEBUNKING THE MYTH

CMS documentation requirements changed in February 2018, and now allow teaching physicians to "verify" in the medical record any student documentation of components of E/M services, rather than re-documenting the work, as long as this is consistent with state and institutional policies.

REGULATORY CLARIFICATION

New guidance was issued from the Centers for Medicare and Medicaid Services in 2018.

The Centers for Medicare & Medicaid Services (CMS) revised the [Medicare Claims Processing Manual](#), chapter 12, section 100.1.1, to update policy on Evaluation and Management (E/M) documentation to allow the teaching physician to verify in the medical record any student documentation of components of E/M services, rather than re-documenting the work. Students may document services in the medical record.¹

However, the teaching physician must verify in the medical record all student documentation or findings, including history, physical exam and/or medical decision making. The teaching physician must personally perform (or re-perform) the physical exam and medical decision-making activities of the E/M service being billed, but may verify any student documentation of them in the medical record, rather than re-documenting this work.²

¹ [CMS Manual System: Pub 100-04 Medicare Claims Processing](#), Chapter 12, Section 100.1. The Centers for Medicare & Medicaid Services, May 31, 2018

² [E/M Service Documentation Provided By Students \(Manual Update\)](#), MLN Matters. The Centers for Medicare & Medicaid Services, June 1, 2018

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