

November 4, 1998

TO: Group on Faculty Practice
Compliance Officers Forum

FROM: G. Robert D'Antuono
Assistant Vice President



Ivy Baer
Regulatory Counsel

Division of Health Care Affairs
AAMC

RE: Clarification of Medical Student Documentation

Some members are asking for still further clarification on the use of medical student documentation. This issue is addressed in a recent letter from HCF A to Dr. Cohen, dated October 15, 1998 that we faxed to all GFP members and Compliance Officers last week.

On page 3 of this letter, HCFA states that:

"...a history taken by a medical student may be included in the documentation for an EM service. Our response is that the medical student's documentation of history can be used in the documentation of the physician's service. The physician would need to verify the medical student's findings but would not have to repeat the note."

HCFA has NOT changed its policy with this clarification. The teaching physician does NOT need to re-document the Review of Systems and Past Family and Social History, if well documented by a medical student, resident, nurse, vis a vis their note or standardized form. However, the teaching physician must perform and briefly re-state the history of present illness, since the rule states the teaching physician must provide a personal, summary note that demonstrates his/her personal service (work) in each of the major component activities of a visit service---ie., history, exam, and medical decision-making---for all NEW patient visits.

For an ESTABLISHED patient visit, such as a subsequent hospital or follow-up office visit, the teaching physician need only perform service and document his/her activity in TWO of the three areas, in accordance with CPT. The physician may select from among the three areas of the visit to provide both personal service and documentation, depending upon patient need.

The documentation by the teaching physician for history of present illness should be a brief statement (as little as one sentence) of why the patient is being seen by the physician on that particular occasion of service.

Should you have any further questions regarding the use of medical student documentation by the teaching physician, please contact us, or your local Medicare carrier medical director.

Thank you.

Cc: Terry Kay
HCFA