

CMS Guidelines

(Center for Medicare and Medicaid Services)



BETHEL
UNIVERSITY

1. Are based on the Patient Protection and Affordable Care Act of 2010 (PPACA)
2. There are different guidelines for resident physicians and students:
 - Resident= individual enrolled in an approved graduate medical education (GME) program
 - Student= participant in accredited education program that is not a GME program
3. Billing for services rendered
 - Medicare only covers services provided by physicians and other licensed practitioners
 - Students do not meet statutes, and therefore are not covered;They may contribute to billable service but must be done in the physical presence of the billing provider (ie. E&M; procedures)

What about other payers? In general, to bill for a service rendered, you must be considered an eligible provider of care. (Enrolled in Medicaid as a provider, or credentialed by the insurance carrier). Students are not licensed clinicians and are not credentialed to provide health care services independently.

4. CMS Guidelines- Documentation in the medical record by the student
 - Handwritten , typed , dictated then transcribed, or electronically generated...all considered documentation of the service provided or the billable service.
5. Student Documentation in the medical record, can only document:
 - Past, Family, and Social History
 - Review of Systems
 - Preceptor must repeat and document HPI, relevant PE, and medical decision-making...(ie. preceptor must go back in the room and ask the HPI questions, do the relevant exam)
6. Student Documentation is important. They need to learn proper documentation as it relates to the medical record. However, their documentation need not become part of the permanent record. We would like our students to write at least two SOAP notes each day, and have the preceptor sign, and use this for student record and evaluation.
7. Preceptor Documentation Recommendation; Preceptor should document essential components of history, physical exam, and medical decision-making.
 - Can not write “agree with above” or “I was present and agree”. These are red flags, and for Medicare. They will assume that you did not see the patient during the encounter, and therefore can not bill.
8. Clinical Coordinator Pearls and Guidance for Preceptors:
 - Must take the lead in care of the patient
 - Do not allow a patient to be evaluated by the student alone.
 - Preceptor should be present and actively involved in any student contributions to portions of the billable service.
 - Require students to document encounters so you can critique their communication skills, and demonstrate PA competency
9. Guidance to students: Document so that it is obvious the preceptor was the primary decision-maker in the encounter.
10. Electronic prescribing
 - Students can not sign prescriptions for medications either on paper or electronically