



CMS Guidelines for Student Documentation

(Center for Medicare and Medicaid Services)

1. Student documentation = the process of medical students documenting clinical services, including history, physical exam and/or medical decision making, in a patient's electronic medical record.
2. Historically, the teaching physician/preceptor was required to re-document the medical student's entries. However, CMS documentation **requirements were updated in February 2018 to allow teaching physicians/preceptors to "verify" student documentation in the medical record rather than re-documenting the work.**
3. Per CMS Guidelines- Student documentation in the medical record may include:
 - Handwritten, typed, dictated and transcribed, or electronically generated...all considered documentation of the service provided or the billable service
 - history, physical exam and/or medical decision making
4. The preceptor 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.
 - ie. preceptor must go back in the room and ask the relevant HPI questions, do the relevant exam then verify the student documentation
5. For purposes of payment, E/M services billed by teaching physicians require that they personally document at least the following:
 - That they performed the service or were physically present during the key or critical portions of the service when performed by the student; and
 - The participation of the teaching physician in the management of the patient
6. Student Documentation is important.
 - Students need to learn proper documentation as it relates to the medical record.
 - We would like our students to write at least two (or more) documentation notes each day to be reviewed/verified by the preceptor and use this for student record and evaluation.
7. Guidance for Preceptors:
 - 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, actively involved in and verify 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.
8. Guidance for Students
 - Document so that it is obvious the preceptor was the primary decision-maker in the encounter.
9. Electronic prescribing
 - Students can not sign prescriptions for medications either on paper or electronically.

DISCLAIMER: This document is intended to convey general information based on guidance issued by applicable regulatory agencies. The content is not to provide legal advice or opinion nor should this information be relied upon for legal guidance in any particular circumstance.

Further information available at:

[CMS Manual System: Pub 100-04 Medicare Claims Processing, Chapter 12, Section 100.1. The Centers for Medicare & Medicaid Services, May 31, 2018](#)
[E/M Service Documentation Provided By Students \(Manual Update\). MLN Matters. The Centers for Medicare & Medicaid Services, June 1, 2018](#)