

**MEDICARE GUIDELINES
SUPERVISING PHYSICIANS IN TEACHING SETTINGS
REVISION EFFECTIVE NOVEMBER 22, 2002**

I What Supervision is Affected?

- A These revised rules apply **ONLY** to the supervision of residents and fellows; **NOT** to NPs, PAs or Medical Students

II Overall Documentation Requirements

- A Date
B Legible signature or identity (SMH Policy 6.0 also requires professional status)
C Service rendered
D Participation of Teaching Physician (TP) in providing the service
E Whether TP was physically present (see definition on reverse)

III General Documentation Instructions + Common Scenarios

A Evaluation and Management (E/M) Services

- 1 Appropriate level of E/M service determined according to CPT code definitions
- 2 TP must personally document at least:
 - ◆ Performance of the service or physical presence during the key or critical portions of the service when performed by the resident
 - ◆ Participation of the TP in the management of the patient
- 3 Can combine documentation of both the resident and TP in assigning billing code
- 4 Combined entries by the TP and resident constitute the documentation for the service and together must support the medical necessity of the service

B Common Scenarios and Documentation Requirements for TP

- 1 TP personally performs all required elements of E/M service without a resident.
 - ◆ Document
 - In the absence of any note by a resident, document entire service
- 2 Resident performs service in presence of, or jointly with, TP.
 - ◆ Document
 - Presence during performance of critical or key portions
 - Direct involvement in management of the patient
 - The TP's note should reference the resident's note

- 3 Resident performs some or all required elements in the absence of TP and documents the service; TP independently performs the critical or key portions of service with or without resident present.
 - ◆ Document
 - Personally saw the patient
 - Personally performed critical or key portions of the service
 - Participated in the management of the patient
 - The TP's note should reference the resident's note
- 4 Sample Documentation – for new patient or follow-up/subsequent visit. **Note emphasis on patient-specific details and problem-specific recommendations.**

"I personally evaluated Mr. S; discussed with housestaff. He presents with fever and a rash. Otherwise his exam is unremarkable. Care plan as outlined above including repeat cultures and CXR in AM because of possible pneumonia vs drug fever. Will hold antibiotics unless he becomes unstable."

IV Unacceptable Documentation

- A Resident documentation of the presence and participation of the TP
- B Specific examples of unacceptable documentation
 - 1 "Agree with above", followed by legible countersignature or identity
 - 2 "Rounded, Reviewed, Agree", followed by legible countersignature or identity
 - 3 "Discussed with resident. Agree", followed by legible countersignature or identity
 - 4 "Patient seen and evaluated", followed by legible countersignature or identity
 - 5 A legible countersignature or identity alone

V New Definitions

- A "Critical or key portion means the part (or parts) of a service that the TP determines is (are) critical or key portion(s). For purposes of this section, these terms are interchangeable."
- B "Documentation means notes recorded in the patient's medical records by a resident, and/or teaching physician or others as outlined in specific situations regarding the service furnished... Documentation must be dated and include a legible signature or identity...documentation must identify, at a minimum, the service furnished, the participation of the teaching physician in providing the service and whether the TP was physically present."
- C "Physically present means that the TP is located in the same room (or partitioned or curtained area, if the room is subdivided to accommodate multiple patients) as the patient and/or performs a face-to-face service."

VI Complete CMS Document

- A The complete CMS publication of Section 15016, Supervising Physicians in Teaching Settings, is available on their web site at:

http://cms.hhs.gov/manuals/pm_trans/R1780B3.pdf