THE UNIVERSITY OF CHICAGO
UChicago Medicine | Office of Corporate Compliance

Tip Sheet: PA & APRN Student Documentation (incl. Telehealth)
February 21, 2022

This document provides workflows a PA/APRN Preceptor must follow when a Student participates in a billable E/M service. For further questions regarding this document contact: compliance@bsd.uchicago.edu.

Effective Jan 1st, 2020 CMS finalized a broad change to allow Physicians, PAs, and APRNs to review and verify, rather than re-document, information placed in the medical record by students, residents, nurses, or other members of the medical team. CMS names PA and APRN (NP, CNS, CNM, and CRNA) students, along with medical students*, as the types of students who may document notes in a patient's medical record that may be reviewed and verified rather than re-documented by the billing professional.

Though students may document, ___PAs and APRNs are paid for professional services only when the services have been personally performed by the PA or APRN___ and no facility or other provider charges, or is paid for furnishing the professional service. This guidance follows the spirit of CMS Teaching Physician rules with respect to Medical Students*, along with Federal Regulations governing PA/APRN billing, and UCM PA/APRN student supervision practice.

Preceptor Requirements when PA/APRN Students Participate in a Billable Visit:

1. **Verification of Student Documentation**
   o Physician Assistants & APRNs may verify, instead of re-document student documentation with the use of the PA/APRN Student Attestation outlined in this guide.

2. **Presence Requirements (Supervision)**
   o Student contribution and participation in the performance of a billable service must be performed under the supervision of the PA or APRN preceptor.

3. **PA/APRN Personal Performance of Billable E/M Service**
   o Physician Assistants and APRNs must personally perform all parts of the professional service when students participate and contribute to the performance of a billable service.

WORKFLOW	
STUDENT WORKFLOW	**PA/APRN PRECEPTOR WORKFLOW**
1. Student performs elements of E/M service under supervision	1. PA/APRN supervises student while performing elements of E/M service
2. Student documents their participation in the performance of an E/M service in a Student Note	2. PA/APRN personally performs all elements of the billable E/M service with the patient (i.e. History, Exam, and Medical Decision Making, etc.)
3. Student routes the Note to the supervising PA/APRN	3. PA/APRN Verifies/Edits Student Note using an option below & Attests: ➢ **Option 1:** Take ownership of Student Note and attest in note ➢ **Option 2:** Attest in Student Note, then create separate note **PA/APRN uses the below attestation(s)** – (see attestation content page 2) FACE-TO-FACE VISITS 1. Add Verification Attest Only: **.VERIFY_PA/APRNSTUDENT** VIRTUAL VISITS **(2-STEP PROCESS)** 1. Add Verification Attestation: **.VERIFY_PA/APRNSTUDENT** 2. **PLUS** Telehealth Attestation: **.ATTTELEHEALTHOUTPATIENT** or **.ATTTELEHEALTHINPATIENT** ➢ Then Choose SmartPhrase: ATTTELEHEALTH_PROVIDER

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ATTESTATIONS FOR PHYSICIAN ASSISTANT AND APRN PRECEPTORS	
CLINIC IN-PERSON **Preceptor Supervises Student During F2F Visit** **.VERIFY_PA/APRNSTUDENT_NOTE**	**STUDENT NOTE ATTESTATION:** I supervised the {PA/APRN} student who participated in the documentation of this note. I personally performed the service and evaluated the patient. I reviewed the student's note and verify agreement with the findings and plan as written.
TELEHEALTH VISIT **Preceptor Supervises Student During Virtual Visit** **.ATTTELEHEALTHOUTPATIENT** • Then Choose SmartPhrase from List: ATTTELEHEALTH_PROVIDER	*(Attest to Student Note first using "**.VERIFY_PA/APRNSTUDENT_NOTE**")* **TELEHEALTH ATTESTATION (ATTTELEHEALTH_PROVIDER):** The {PATIENT/SURROGATE:935} participated in the encounter via {Video/Telephone}. Identity was verified by name and {identityconfirmation:931}. Verbal consent for the visit was provided. • ***Telephone***: I spent *** minutes on the telephone with the patient on the date of this encounter. I {was/was not} onsite. • ***Video***: I spent a total of *** minutes (excluding separately reportable procedure time) in care of this patient on {:LNK,ED}. I {was/was not} onsite. *{TIP | MDM based attestation - only complete below SmartList if you plan to use MDM to level this service:220262}* **{MDM (Optional):200051}** Note that this visit was determined by MDM instead of time and that the risk associated with the patient's management today was *** .

References:

1. Teaching Physicians: E/M Service Documentation Provided by (Medical) Students
   Transmittals R4068CP 2018   Clm Manual 104 Chapter 12 Sec 100.1.1.B

2. Teaching Physicians: Payment for Physician Services in Teaching Settings Under the MPFS (Residents)
   Clm Manual 104 Chapter 12 Sec 100.1 & 100.1.1.A

3. FY20 Physician Fee Schedule Final Rule
   FY20 PFS Final Rule

4. CMS Code of Federal Regulations:
   APN 42 FR 410.75   PA 42 FR 410.74

*Disclaimer: Teaching Physician rules governing Residents do not apply to Physician Assistants & APRN Students. Residents and Students are defined differently by CMS. A student is "an individual who participates in an accredited educational program (e.g., a medical school) that is not an approved GME program. A student is never considered to be an intern or a resident. Medicare does not pay for any service furnished by a student."