



TITLE: RC 108 Medical Student Documentation

Definitions

Cosigner means the teaching physician or resident responsible for reviewing and verifying the medical student's findings.

Critical or Key Portion means that part (or parts) of a service that the teaching physician determines is (are) a critical or key portion(s). For purposes of this section, these terms are interchangeable.

Direct Medical and Surgical Services means services to patients that are either personally furnished by a physician or furnished by a resident under the supervision of a physician at JPS (a teaching hospital) making the reasonable cost election for physician services furnished in teaching hospitals.

Documentation means notes recorded in the patient's medical record. Documentation may be dictated and typed or hand-written, or computer-generated and typed or handwritten. Documentation must be dated and include a legible signature or identity.

Pursuant to 42 CFR § 415.172 (b), documentation must identify, **at a minimum**:

- 1) the service furnished;
- 2) the participation of the teaching physician in providing the service; **and**
- 3) whether the teaching physician was physically present.

Evaluation and Management (E/M) Services means the appropriately selected level of E/M service for a given encounter as determined in accordance with the American Medical Association's Current Procedural Terminology (CPT) and any applicable documentation guidelines.

Medical Student means 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.

Medical Student Signature includes the medical student's name and year in school.

Physically Present means the teaching physician 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.



Resident means an individual who participates in an approved graduate medical education (GME) program or a physician who is not in an approved GME program but who is authorized to practice only in a hospital setting.

Dotphrase means “.medstudentattestation”

Teaching Hospital means JPS, a hospital engaged in an approved GME residency program in medicine, osteopathy, dentistry, or podiatry.

Teaching Physician means a physician (other than another resident) who involves residents in the care of his or her patients.

I. Medical Student Documentation in the EHR

1.01 Add/Update Past, Family and Social History (PFSH), Review of Symptoms (ROS): Medical Students may add/update past, family, and social history and review of systems in order to keep their patient’s EHR updated. **The physician is responsible for confirming the information and authenticating his or her note. If this information is used as part of the patient’s History and Physical (H&P), the physician who authenticates the H&P is responsible for its contents.**

1.02 Problem List: Medical Students may update their patient’s problem list.

1.03 Medication History: Within Epic@JPS, the Medical Student may use Admission, Discharge, Transfer (ADT) navigators to pend medication reconciliation for Admissions and Discharges on their inpatients.

1.03.01 “Admission” activity tab: the Medical Student may pend medications using the “Med/Rec-Pend” button.

1.03.02 “Discharge” activity tab: the Medical Student may use the “Medication Reconciliation” button, which pends the order until the order is signed by the physician.

1.04 Orders: When working in Epic@JPS, and when clinically appropriate, medical students may enter pending orders through the “Save Work” button in the “Orders” activity section during the admission, daily hospital care, or discharge process.



1.04.01 A physician of the patient's team who has an active and unrestricted Texas license shall sign the order.

1.04.02 Medical Students do not have the authority to give verbal orders and shall not attempt to do so.

1.05 Contribute to Hospital Course: Within the "Discharge" activity tab, the Medical Student may contribute to the patient's hospital course and keep this updated for their patients.

1.06 After Visit Summary: Medical students may participate in creating the patient After Visit Summary.

II. Use of Medical Student Documentation in EHR

2.01 Use of Medical Student Notes by Physicians and Resident Physicians

The standards below reflect the current rules promulgated by the Centers for Medicare and Medicaid Services (CMS) concerning a Medical Student's contribution toward a billable service.¹

2.02 Use of a Medical Student's contribution toward a billable service.

Any contribution and participation of a student to the performance of a billable service (other than the review of systems and/or past family/social history which are not separately billable, but are taken as part of an E/M service) must be performed in the physical presence of a teaching physician or physical presence of a resident in a service meeting the requirements set forth in this section for teaching physician billing.

Students may document services in the medical record. However, the teaching physician must verify in the medical record all student documentation or findings, including history, physical exam and/or medical decision making. The teaching physician

¹ See Pub. No. 100-04, Centers for Medicare & Medicaid Services, Claims Processing Manual, Ch. 12 § 100.1 et seq. (<http://cms.gov>, 2019).



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.

This section only applies to physicians with an active and unrestricted license to practice medicine in Texas. This section does not apply to other students (NP/PA students), NPs, or PAs.

III. Authentication of Medical Student Documentation—Resident Present

3.01 Interview and Examination of the Patient. The medical student shall interview and examine the patient in the physical presence of a resident. The standard procedure is to have a resident present during this student interview and examination, but where circumstances do not permit the presence of a resident, the presence of a teaching physician shall fulfill the physical presence requirement.

3.02 Resident Physically Present. The Medical Student must ensure that a Resident:

- a) is present during the Medical Student's interview and examination of the patient;
- b) verifies the patient history; **and**
- c) performs or re-performs the physician exam and medical decisions.

3.03 Medical Student Documentation. Each Medical Student shall provide complete, contemporaneous, and legible documentation that is consistent with the requirements set forth by the Texas Medical Board for keeping an adequate medical record.

3.04 Medical Student Signature. The Medical Student shall sign his or her documentation with his or her name and year in school.

3.05 Resident Co-Signature Required. The Medical Student shall select the appropriate Resident to co-sign his or her documentation and sign the note requesting



the co-signature. The request should be delivered to the Resident's *in-basket cosign notes folder* for further action.

3.05.01 The Resident shall edit, where appropriate, the Medical Student's note and provide additional documentation as necessary.

3.05.02 The Resident shall sign an attestation using the Dotphrase ".medstudentattestation."

3.05.03 The Resident shall select a Faculty to co-sign the note.

3.06 Faculty Co-Signature Required. The procedure for Physician attestation of Medical Student documentation varies according to whether the patient care setting is inpatient, outpatient, or emergency department.

3.06.01 Physician Attestation—Inpatient. Faculty will determine whether the note submitted by the Resident requires editing and, if so, shall edit the note. Once a physician determines a note does not require, or no longer requires, editing, the physician shall complete the attestation (using Dotphrase ".medstudentattestation"), and sign the note.

3.06.02 Physician Attestation—Outpatient. Faculty will determine whether the note submitted by the Resident requires editing and, if so, shall message the Resident to edit the note as necessary. Once a physician determines a note does not require, or no longer requires, editing, the physician shall complete the attestation (using Dotphrase ".medstudentattestation"), and sign the note.

3.06.03 Physician Attestation—Emergency Department. Faculty will determine whether the note submitted by the Resident requires editing and, if so, shall edit the note. Once a physician determines a note does not require, or no longer requires, editing, the physician shall complete the attestation (using Dotphrase ".medstudentattestation"), and sign the note.



IV. Authentication of Medical Student Documentation—Faculty Present

4.01 Interview and Examination of the Patient. The medical student shall interview and examine the patient in the physical presence of a resident. The standard procedure is to have a resident present during this student interview and examination, but where circumstances do not permit the presence of a resident, the presence of a teaching physician shall fulfill the physical presence requirement.

4.02 Faculty Physically Present. The Medical Student must ensure that a Resident:

- a) is present during the Medical Student's interview and examination of the patient;
- b) verifies the patient history; **and**
- c) performs or re-performs the physician exam and medical decisions.

4.03 Medical Student Documentation. Each Medical Student shall provide complete, contemporaneous, and legible documentation that is consistent with the requirements set forth by the Texas Medical Board for keeping an adequate medical record.

4.04 Medical Student Signature. The Medical Student shall sign his or her documentation with his or her name and year in school.

4.05 Faculty Co-Signature Required. Faculty will determine whether the note submitted by the Medical Student requires editing and, if so, shall edit the note. Once a physician determines a note does not require, or no longer requires, editing, the physician shall complete the attestation (using Dotphrase ".medstudentattestation"), and sign the note.



V. Sample Attestations Verifying Physical Presence and Accuracy

Scenario 1: Medical Student working with Faculty only

*I was physically present on [date of service] with the medical student who participated in the documentation of this note and personally performed or re-performed the physical exam and medical decision making. I have evaluated the patient, reviewed and verified all of the medical student documentation including the history, exam, medical decision making and findings. I agree with the assessment and plan of care. Additional findings include *** [Drop down→none, ***]*

Scenario 2: Medical Student working with Resident team and Faculty

Resident attestation

*I was physically present on [date of service] with the medical student who participated in the documentation of this note and personally performed or re-performed the physical exam and medical decision making. I have evaluated the patient, reviewed and verified all of the medical student documentation including the history, exam, medical decision making and findings. I agree with the assessment and plan of care. Additional findings include *** [Drop down→none, ***]*

Faculty attestation

*I and/or the resident/fellow were present on [date of service] with the medical student who participated in the documentation of this note. I or the resident/fellow personally performed or re-performed the physical exam and medical decision making. I have evaluated the patient, reviewed, and verified all of the medical student and resident/fellow documentation including the history, exam, medical decision making and findings. I agree with the assessment and plan of care. Additional findings include *** [Drop down→none, ***]*

References and Attachments:

RC 100 Medical Records

Pub. No. 100-04, Centers for Medicare & Medicaid Services, Claims Processing Manual, Ch. 12 § 100.1 et seq. (<http://cms.gov>, 2019).



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Procedure #: RC 108 Medical Student Documentation
Originating Department: Compliance
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22 TAC §165.1.

Medical Student Work Flow—Inpatient (pdf attachment)

Medical Student Work Flow—ED (pdf attachment)

Medical Student Work Flow—Outpatient with Faculty (pdf attachment)

Medical Student Work Flow—Outpatient with Resident (pdf attachment)