

## Part B Insider (Multispecialty) Coding Alert

### EVALUATION & MANAGEMENT: Outpatient Teaching Doctors Face Confusion

When the **Centers for Medicare & Medicaid Services** unveiled new documentation requirements for teaching physicians late last year, many rejoiced. Finally, physicians wouldn't have to repeat documentation already provided by residents.

The change affects evaluation and management services provided by residents and billed by teaching physicians, according to the **American College of Physicians-American Society of Internal Medicine**. Medicare auditors must consider the combined medical record entry of the teaching physician and the resident when deciding whether documentation justifies the level of service the teaching physician billed.

But some outpatient physicians who teach medical residents say the new guidelines present them with impossible hurdles to jump.

In CMS' Open Door Forum for physicians, one physician complained that the new guidelines leave important ambiguities in the outpatient setting. The new guidelines require a preceptor to document his involvement the same day as the resident provided the service. Teaching physicians also must document that they reviewed the resident's written record of the patient visit.

But in an outpatient setting, the resident's record might not be available for a few days, until the practice gets the dictation transcribed.

The physician said he sought guidance from CMS officials, who passed him on to one of the physicians who developed the new guidelines. That physician reportedly said nothing had changed, since outpatient teaching physicians couldn't comply with the previous version of the guidelines either.

CMS officials said they would follow up the outpatient teaching physicians' concerns in an "action item."

Not everyone sympathizes with the outpatient physicians' dilemma, however. "The complaint that it takes three days to get [a record] back from transcription is an administrative problem of the practice," argues consultant **Quin Buechner** with **Proactive Consultants** in Cumberland, WI. "It's not an impossibility, it's an inconvenience," he argues.

Most importantly, the teaching physician needs to be able to go back and fix any of the resident's mistakes before the patients "take off into parts unknown," Buechner says.