Dear [INSERT NAME HERE]:

Earlier this year, the Centers for Medicare and Medicaid Services (CMS) amended the Medicare Claims Processing Manual to allow for teaching physician verification — rather than redocumentation — of student notes related to Evaluation and Management (E/M) services (Transmittal 3971, later replaced by Transmittal 4068). Subsequent communications from CMS indicate that the agency believes these changes only apply to medical student documentation and not to PA student documentation.

CMS will be accepting comments on its related Physician Fee Schedule proposed rule through September 10, and we’re asking all PA education advocates to urge CMS to interpret the Transmittal as also allowing teaching physicians to verify PA student documentation. In addition to submitting our suggested comments, please share your own brief story about the impact of current E/M documentation requirements on your preceptors and the value of allowing teaching physician verification of PA student documentation.

Should you wish to draft your own comments to be submitted on Regulations.gov, please feel free to use the following key talking points:

- Requiring teaching physicians to reperform student documentation of E/M services is a significant administrative burden that adversely impacts patient care and the willingness of clinicians to train students.
- The existing Medicare Claims Processing Manual definition of “student” unambiguously includes physician assistant and nurse practitioner students.
- Transmittal 4068, which removes previous references to medical students and allows teaching physicians to verify rather than reperform student documentation, should be interpreted to include documentation by physician assistant and nurse practitioner students based on the Medicare Claims Processing Manual.
- Restricting verification of student documentation to medical students would create a two-tiered system in which preceptors would be increasingly unwilling to train physician assistant and nurse practitioner students due to additional unnecessary documentation requirements.

This is just the first step. Next on the advocacy agenda, we will work to encourage CMS to also include PA and nurse practitioner preceptors within the definition of “teaching physician.” Stay tuned, because we’ll need your help.

If you have any questions, please let us know.

Sincerely,

David Keahey, MSPH, PA-C
Chief Policy & Research Officer