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Utah's Nurse Practitioners:

The comments period for this change expires on September 10, 2018. NOW is the time to make your voice heard!

<https://www.regulations.gov/comment?D=CMS-2018-0076-0621>

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). This change was celebrated by students, preceptors, and teaching institutions as a step in the right direction to decrease the regulatory burden that comes with the training of clinicians.

We urge CMS to include NP and PA Preceptors. This can be accomplished by changing the language from "teaching physician" to "teaching provider". The Secretary has statutory authority to define "teaching physician" and could include NP and PA preceptors, preferably using the term "teaching provider." If CMS believes such a change would require additional rulemaking, the Secretary could use his existing waiver authority or issue a nonenforcement instruction to Medicare carriers to immediately extend the teaching physician policies to NP and PA preceptors.

We urge CMS to include NP and PA students. CMS has the authority to interpret the word "student" in Transmittal 4068 to include NP and PA students. The term "student" is not defined in regulation, and the existing definition of "student" in the Medicare Claims Processing Manual already includes NP and PA students. Harmonizing this interpretation could be accomplished through guidance, would not require rulemaking. However, this language is only specific to medical students and physician trainees. It does not take into account NP or PA students.

We strongly urge you to take 1-2 minutes and go to the link provided here to make your voice heard on this important matter. It is our belief that excellent student experiences make excellent clinicians and we sincerely hope you get yourself and your colleagues involved to make the change become reality.

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Sincerely,

Mike Vreeland, APRN
President



Please feel free to use the following talking points:

- Include NP preceptors and PA preceptors in the definition of "teaching physician."
- Change the language of "teaching physician" to "teaching provider".
- Include NP and PA Students in the interpretation of "Student."
- 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.
- 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.
- 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.
- Restrictive policies surrounding student documentation may lead to suboptimal student experiences where student learning and participation is greatly diminished.