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To Centers for Medicare and Medicaid Services (CMS):

The amended 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) 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. However, this amendment has left out nurse practitioners (NPs) and physician assistants (PAs). Utah Nurse Practitioners respectfully urge CMS to put NPs and PAs back into the Processing Manual.

***We urge CMS to include NPs and PAs to verify E/M service student documentation.***

Reperforming 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 NP and PA students due to additional documentation requirements.

***We urge CMS to include NP and PA Preceptors.*** The amended language only includes a "teaching physician". Simply changing this term from "teaching physician" to more inclusive terms, such as "teaching provider" or "teaching clinician" would resolve this issue. 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. The Secretary has statutory authority to define "teaching physician" and could include NP and PA preceptors.

***We urge CMS to include NP and PA Students.*** The amended language does not take into account NP or PA students. CMS has the authority to interpret the word "student" in Transmittal 4068 to include NP and PA students. In Transmittal 3971, the definition of "student" in the Medicare Claims Processing Manual already includes NP and PA students. However, the language in Transmittal 4068 is only specific to "medical students" and "physician trainees".

Utah Nurse Practitioners respectfully urges CMS to include NPs and PAs as preceptors, students and verification of student documentation in the Medicare Claims Processing Manual (Transmittal 4068).

Sincerely,

Mike Vreeland, APRN

Nurse Practitioner  
President

