



Student Medical Record Documentation

SCOPE:

This policy was developed for SIU Medicine (“SIU”). SIU collectively applies to the SIU School of Medicine (“SIU SOM”), including the Federally Qualified Health Center (“FQHC”), and SIU HealthCare (“SIU HC”). These entities are collectively referred to as SIU in this policy.

This policy applies to SIU staff, faculty, trainees, agents, officers, directors, interns, volunteers, contractors, and any other individual or entity engaged in providing teaching, research and health care items and services at SIU. These individuals are collectively referred to as SIU personnel in this policy.

PURPOSE:

SIU has implemented a compliance program establishing effective internal controls promoting adherence to all applicable Federal and State laws and regulations, the requirements of Federal health care programs, and SIU’s Code of Conduct. This policy outlines when a student may document in an SIU medical record, as well as, the documentation requirements for the physician, physician assistant, or advanced practical registered nurse, if the student documentation is to be used to support a billable service.

POLICY:

SIU is committed to complying with all applicable Federal and State laws and regulations and the requirements of Federal health care programs. Since SIU is an academic institution, SIU strives to provide a practical education experience for all students who participate in patient care. As such, at the discretion of the teaching provider, a student may document in a SIU patient medical record their participation in providing patient care to SIU patients.

This policy does not apply when students are participating in patient care at SIU affiliated sites and are documenting in electronic health records not owned, licensed, or operated by SIU. SIU affiliated sites would include organizations with which SIU has established relationships related to patient care, such as partnering hospitals. When students are participating in patient care at SIU affiliated sites and have access to the affiliated sites electronic health record, students and teaching providers are required to follow the policies and procedures at those sites regarding student documentation in the medical record.



DEFINITIONS:

Advanced Practice Registered Nurse (“APRN”) – is a Nurse Practitioner, Certified Nurse Midwife, Clinical Nurse Specialist, or Certified Registered Nurse Anesthetist.

Dental Student – an individual who is a student or post-graduate resident at an approved Dental School.

Physician Assistant (“PA”) – is a mid-level medical practitioner who works under the supervision of a licensed medical or osteopathic physician.

Resident – 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.

Student – an individual who participates in an accredited educational program (e.g., a medical school). Student would also include an individual who is attending an accredited education program to become a PA or APRN.

Teaching Provider – is a physician, other than an intern or resident, who involves residents and students in the care of his or her patients. A Teaching Provider would also include a PA or APRN who is responsible for the training of Students who are in an accredited education program to become a PA or APRN.

PROCEDURES:

Student documentation in a SIU patient medical record is for educational purposes only and should not solely be relied upon for billing purposes. Services provided by a student are not reimbursable by Federal health care programs. However, a teaching provider may rely upon the documentation of a student, if the teaching provider personally performed or re-performed the key components of the services documented by the student and the student documentation is accurate based on the medical opinion of the teaching provider. The key components of an evaluation and management service are history of present illness, physical exam, and medical decision making.

If the teaching provider is going to rely on the documentation of a student to reflect the medical services provided to the SIU patient, then the teaching provider must document in the medical record that they saw the patient, personally performed or re-performed the services documented in the medical record, and that they reviewed and verified all information documented by the student. The teaching provider is expected to make any edits to the student documentation based



on their review and verification of the information. An example of a teaching provider verification and attestation is:

A student assisted with the documentation of this service. I personally performed the services documented and reviewed and verified all information documented by the student and made modifications to the documentation, when appropriate.

In addition to the teaching physician documenting their verification and attestation of the student documentation, the student must document their participation in the documentation. An example of this documentation is:

I, [insert student name], participated in the documentation of this service as a student on [insert date] at [insert time].

If both a student and resident document in the SIU patient medical record, the teaching provider should follow the guidelines and documentation requirements listed above for any student documentation that will be utilized to support a billable service and should follow the supervision and documentation requirements for the portion of the record documented by a resident. This may lead to the teaching provider having to include two attestations, one for the student documentation and one for the resident documentation.

Dental student documentation in the SIU patient dental record may be relied upon under the direct supervision of the attending dentist for billing purposes to the Illinois Department of Healthcare and Family Services Dental Program. The attending dentist is not required to perform or re-perform the key services of the dental procedure, when performed by a dental student under direct supervision.

PERIODIC REVIEW OF POLICIES AND PROCEDURES

SIU shall review its policy and procedure for Student Medical Record Documentation at least once every two (2) years.

OFFICE OF RESPONSIBILITY

The Office of Compliance and Ethics

Approved: June 9, 2021
Revisions: N/A