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- 'Incident to', Shared and Scribed Services Documentation Errors

Compliance Hotline

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"Incident to", Shared and Scribed Services Documentation Errors

TrailBlazer's Medical Review department and the Comprehensive Error Rate Testing (CERT) contractor have recently noted problems with the documentation of "incident to", shared and scribed services. These errors include:

- **Documentation does not demonstrate what portion of the encounter was performed by the physician.**
 - A non-physician practitioner (NPP) should not document the physician's work and vice versa. Each provider must always document the service he/she performed.
- **Documentation does not demonstrate the physician's involvement in the management of the patient's condition.**
 - A summary statement such as "seen and examined" or "discussed and agree" is not sufficient to describe the physician's involvement.
- **Documentation does not establish that a face-to-face encounter occurred between the physician and the patient.**

"Incident to"

- These services are commonly furnished in a physician's office.
- The physician must have initially seen the patient.
- There is direct supervision by the physician (physician is present in the office suite).
- The physician has an active part in the ongoing care of the patient.

Documentation must clearly link the services of the NPP and the services of the supervising physician. This may be demonstrated by:

- Co-signature or legible identity and credentials of both the NPP and the supervising physician on the documentation and
- Documentation of the physician's involvement in the patient's care.

Shared Services

"Incident to" services may not be billed in the inpatient setting. When a hospital evaluation and management service is **shared** between a physician and an NPP from the same group practice and the physician provides any face-to-face portion of the E/M encounter with the patient, the service may be billed under either the physician's or the NPP's National Provider Identifier (NPI). Documentation must:

- Demonstrate that the physician personally saw the patient face-to-face and participated in the management of the patient.
- Not be limited to a physician's co-signature of the NPP's note or additions to the NPP's note.
- Not simply indicate that the physician reviewed and/or discussed the case with the NPP.

Scribed Services

Scribed services may be performed in any setting. When an NPP acts as a scribe for a physician, the medical record must clearly document that the NPP is acting as a scribe and be signed by both the "scribe" and the physician. **Documentation is considered to be scribed when the NPP documents in the record while the physician is personally performing the service. The NPP may not provide any part of the professional service to the patient.** The documentation must clearly identify the provider who performed the service.
