

# General, Direct and Personal Supervision: Who, What, Where and Why of Meeting Medicare's Supervision Guidelines

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# Levels of Supervision

- **General:**
  - Under the physician's overall direction
- **Direct:**
  - Present in office suite, immediately available
- **Personal:**
  - In attendance in room during procedure

# Supervision Guidelines: Diagnostic Testing

# Levels of Supervision

- Additional levels of supervision:
  - General physician supervision unless:
    - Qualified, independent or clinical psychologist
    - Qualified audiologist
  - Direct physician supervision:
    - Non-certified technician
    - Non-certified PT
  - Personally performed by physician or ABPTS certified PT

# Levels of Supervision

- Diagnostic tests under section 1861(s)(3) may be furnished “incident to”
- Diagnostic test supervision requirements override “incident to” supervision requirements

# Supervision Guidelines

- Application:
  - Technical component only (TC) services
  - TC billed globally with professional component
  - Urodynamic procedures, fetal testing, shunt and pump reprogramming, radiology services and medical diagnostic testing
- Excludes:
  - Diagnostic tests furnished in hospitals

# Supervising Physician

- MD
- DO
- Dentists
  - within limitations of \*2020.3
- Chiropractor
  - within limitations of \*2020.26
- Doctor of podiatry or surgical chiropody
  - within limitations of \*2020.4
- Doctor of optometry
  - within limitations of \*2020.25

# Supervising Physician

- Excludes:
  - Nurse Practitioners\*
  - Clinical Nurse Specialists\*
  - Physician Assistants\*
  - Christian Science Practitioner
  - Naturopath



# Documentation of Supervision

- General:
  - Medical record statement or
  - Documented office policy and procedure
- Direct:
  - Medical record statement or
  - Office/facility schedule or attendance log
- Personal:
  - Medical record statement

# Supervision Guidelines:

## “Incident To” Services

# Levels of Supervision

- “Direct Personal Supervision:”
  - Office
  - Physician directed clinic or group association
  - Non-office settings
- General Supervision:
  - Homebound patients in medically under-served areas

# “Incident To” Services

- Integral but incidental to the physician’s professional service
- Commonly rendered without charge or included in the physician’s bill
- Commonly furnished in physician offices and clinics
- Furnished by the physician or auxiliary personnel

# Supervising Personnel

- Physician
- Audiologist
- Certified Nurse  
Midwife (CNM)
- Clinical Nurse  
Specialist (CNS)
- Physical Therapist  
(PT)
- Occupational  
Therapist (OT)
- Clinical Psychologist
- Nurse Practitioner  
(NP)
- Physician Assistant  
(PA)

# Employment Guidelines

- Individual acting under the physician's supervision:
  - Includes: employee, leased employee or independent contractor of the physician or entity
- Supervising personnel
  - Includes: employee, leased employee or independent contractor of the entity
  - Reassignment of benefits to billing entity

# Documentation of Supervision

- Medical record must clearly identify the individual rendering service
- Physician's initiation and involvement in the patient's course of treatment
- Physician supervision at time of service

# Supervision Guidelines: Teaching Services



# Supervision Levels

- General Supervision (“Supervisory”)
- Primary care exception
- “Line of sight”
- “Physically present”

# Supervision and Documentation for Teaching Services

- E/M services
- Time-based codes
- Surgery and endoscopic surgery
- Overlapping surgeries
- Assistants at surgery
- Minor procedures

# Supervision and Documentation for Teaching Services

- Anesthesia
- Endoscopy procedures
- Interpretation of diagnostic tests
- Interventional and high-risk procedures
- Psychiatry
- Obstetrics

# Supervision Guidelines: Miscellaneous Services

# Supervision Guidelines

- Nurse Practitioners and Physician Assistants
- CRNA services
- Physical therapy services

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