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

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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

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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