

**Institutional Handbook of Operating Procedures**  
**Policy 06.03.03**

Section: Compliance	Responsible Vice President: Senior Vice President & General Counsel
Subject: Coding and Billing	Responsible Entity: Office of Institutional Compliance

**I. Title**

*Use of Scribes*

**II. Policy**

Every entry in the medical record that is made on behalf of a faculty physician, a [Non-Physician Practitioner \(NPP\)](#), or a resident (when his/her entry is scribed), must be authenticated by an attestation from the faculty physician, the NPP, or the resident that the documentation reflects his or her performance of the service(s). A [scribe](#) can be a NPP, nurse, resident, or other ancillary personnel allowed by the physician, the NPP, or the resident to document his or her services in the patient's medical record. These ancillary personnel do not have to be employed by the physician or NPP performing the service(s) in order to scribe. When a NPP has used a scribe to document his/her services (i.e. NP or PA student), a faculty physician cannot perform or bill a split/shared visit with the NPP. Under this scenario, the NPP must bill for the service.

*Purpose:* To define UTMB's policy for the use of scribes to document in the patient's medical record on behalf of the faculty physician, the NPP, or the resident.

*Audience:* Physicians, Non-Physician Practitioners, Residents, Department Administrators, Billing Managers, Billing and Coding Staff.

Violation of this policy may result in disciplinary action up to and including termination for employees; termination of the ability to utilize scribes; termination of employment relationship in the case of contractors or consultants; or suspension or expulsion in the case of a student. Additionally, individuals may be subject to loss of access privileges and civil and/or criminal prosecution.

**III. Procedures**

- A. Documentation and all attestations must clearly reflect what transpired during the encounter.
- B. A scribe's entry must accurately reflect the service provided on a specific date of service. Documentation of scribed services must clearly indicate:
  - 1. Who performed the service
  - 2. Who recorded the service
  - 3. Qualification of each person (i.e., professional degree, medical title)
  - 4. Signed and dated by both, the physician, the NPP, or the resident, and the scribe
- C. The provider is responsible for the content of the documentation even when the faculty physician, the NPP, or the resident utilizes a scribe to document the medical record entry on his/her behalf.

- D.** The **faculty physician, NPP, or resident must state that the note was scribed as dictated and that it is his/her documentation. The faculty physician, NPP, or resident, and the scribe must then sign the attestation** to authenticate the entry.
- Example- “I, Dr. \_\_\_\_\_, (or NPP or resident as applicable) personally performed and/or ordered the services described in this documentation, as scribed by \_\_\_\_\_ in my presence, and it is both accurate and complete.”  
(Signed) *Dr. Faculty, Date, Time*
  - Example- “I, \_\_\_\_\_, am scribing for, and in the presence of, Dr. \_\_\_\_\_ (or NPP or resident as applicable) who performed and/or ordered the services described here-in.”  
(Signed) *Scribe, Qualifications, Date, Time*
- E.** The authentication must take place within reasonable time after the patient encounter. Authentication cannot be delegated to another physician or practitioner.
- F.** The faculty physician must also include a teaching physician attestation (TPA), as required, when there is resident involvement during the encounter.

**IV. References**

- [The Joint Commission Standards FAQ Details on Scribes](#)
- [Novitas Jurisdiction H Provider Bulletin on Scribe Services](#)

**V. Dates Approved or Amended**

<i>Originated: 04/20/2015</i>	
<i>Reviewed with Changes</i>	<i>Reviewed without Changes</i>
05/18/2017	
09/16/2021	

**VI. Contact Information**

Office of Institutional Compliance  
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