

Incident To Audit

Chart #		Physician:		Met Criteria:	
DOS		NPP:			

Rule	Task	Met Criteria	
		Yes	No
Supervision	Is there direct supervision by a group physician? (Present in the office suite to assist, if necessary. The physician does not need to be physically present in the patient treatment room for these services)?		
Supervision	Is there a documentation link between auxiliary staff and the physician when the incident-to service was performed? (Records of when the supervising physician was in the office suite, i.e. physician schedules, etc or documentation in the medical record by the physician.)?		
Estab Incident To	Did the physician personally perform the initial service and develop the plan of care? (Non-physician practitioners (NPPs) cannot see established patients with new problems incident-to)?		
MD Involvement	Is the service a part of the patient's normal course of treatment?		
MD Involvement	Is the physician 'actively' involved in the patient's treatment?		
MD Documentation	Is the physician's involvement documented in order to prove physician involvement on an "active" level?		
Auxiliary Staff Service	If service is performed by auxiliary staffs, who are not NPPs, is only a level 1 visit (CPT 99211) billed? (NPPs can bill for whatever established patient evaluation and management level that is documented)		
Auxiliary Staff Documentation	If the review of systems (ROS) and past family and social history (PFSH)? were performed by auxiliary is there documentation to support that the physician and/or NPP personally reviewed this documentation by confirming it in the medical record?		
Scribes	If a scribe was used, did they only document what was dictated to them by the physician and is the scribe identified as such? (Scribes do not act on their own)		
Drug Not Self-administered	Drugs were given by members of the physician's staff and could not have been self-administered		
Drug Staff	Drug staff was directly supervised by the physician and this is evidenced for the date of service		
Drug Expense	Drug given represented an expense to the physician as far as documentation demonstrates		
Billing Primary MD	The physician who performs the initial evaluation of the current problem is listed in Box 17 and 17a, if they are not supervising on today's date		
Billing Supervision	The physician who supervised the service for this date has their NPI in Box 24J		