

## Understanding Physician Supervision Levels

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Q – Does the doctor have to be in the clinic when we take an x-ray? I have a free lunch coming if I am right. Thanks. N.C.

A – There are three levels of physician supervision according to CMS guidelines. The physician fee schedule includes an indicator that helps to illustrate the minimum level required for each of those services. National and State Fee Schedule Database information can be found at [www.cms.hhs.gov/center/practice.asp](http://www.cms.hhs.gov/center/practice.asp).

It is important to note that documentation maintained by the billing provider must demonstrate that the required physician supervision is furnished. Services that are not performed under the appropriate supervision are not considered reasonable and necessary and, therefore, are not covered under Medicare.

An example of the requirements for a chest x-ray would be:

- 71020 – chest x-ray requires general supervision
- 71023 – chest x-ray with fluoroscopy requires personal supervision

### Physician Supervision of Diagnostic Tests

General supervision means the procedure is furnished under the physician's overall direction and control, but the physician's presence is not required during the performance of the procedure. Under general supervision, the training of the nonphysician personnel who actually performs the diagnostic procedure and the maintenance of the necessary equipment and supplies are the continuing responsibility of the physician.

Direct supervision in the office setting means the physician must be present in the office suite and immediately available to furnish assistance and direction throughout the performance of the procedure. It does not mean that the physician must be present in the room when the procedure is performed.

Personal supervision means a physician must be in attendance in the room during the performance of the procedure.

This policy applies to technical components (TCs) (including TCs billed globally with the professional component (PC) of the procedure) and other diagnostic procedures which do not have relative value units reflecting physician work. These supervision requirements do not apply to diagnostic tests furnished in hospitals.

Source: Practice Management Institute

For further training, certification and other resources, see listing of programs at [www.pmimd.com](http://www.pmimd.com)

Publications on this topic on website [www.practicesupport.com](http://www.practicesupport.com) include:

[Practical E/M: Documentation and Coding Solutions for Quality](#)