

Documentation Guidelines for Emergency Physicians Providing Observation Services
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Under CMS guidelines, billing for observation professional services by emergency medicine groups typically necessitates that an observation code is submitted in place of an E/M code. This document is designed to provide guidance for emergency physicians in completing both observation notes and discharge summaries which are CMS compliant.

1. What are the elements required for an observation note?
 - a. Initial evaluation and management and observation documentation requirements are similar, except observation notes are required to include Past Medical History, Social History, and Family History.
 - b. The levels of complexity for observation levels of service are roughly parallel to E/M 99283-99285 codes.
 - c. Additionally:
 - i. An order for observation status is necessary (electronic order is acceptable).
 - ii. Progress notes may be entered separately or as an addendum to the initial observation note.
2. What are the necessary elements of an observation discharge summary note?
 - a. Final examination
 - b. Description of clinical care provided while under observation
 - c. Medical decision making and final diagnosis
 - d. Plans for ongoing care (referring to electronic discharge instructions is acceptable)
 - e. Length of time in observation
 - i. From ED registration to Observation discharge
 - f. Notes
 - i. A complete history and physical similar to the initial observation history and physical does NOT need to be repeated.
 - ii. The discharge summary note should be a separate, standalone note.

Additional resource:

ACEP Website - [Observations Services FAQs- Physician Coding and Hospital Payment](#)