

# Start-Stop Time Attestation Cheat Sheet

Reviewed by the BastionGPT Clinical Advisory Board · August 2026

**A start-stop time attestation** is the notation in a psychotherapy progress note that records when the session began and ended, or the total face-to-face minutes, to support time-based codes such as 90832, 90834, and 90837. Payers and auditors use it to verify the billed code; most versions run one to two lines inside the note. US Medicare accepts either format, start and stop times or total time (CMS A57520); in Australia, meeting the stated duration is a condition of the MBS benefit.

**1 • Date of service and service type** the minutes attach to one encounter

**Do:** anchor the time statement to the date and the service furnished: individual, group, telehealth, or E/M plus add-on.

**Pitfall:** a time entry that floats free of the service description; reviewers match the claim line to the note.

**2 • Start and stop clock times** optional for Medicare, strongest in audit

**Do:** record when face-to-face psychotherapy began and ended, such as 3:02 pm to 3:55 pm.

**Pitfall:** copying the appointment slot from the schedule; the booked block is not the clinical time.

**3 • Total face-to-face minutes** keep the arithmetic visible

**Do:** write out the computed duration (= 53 minutes), even when you also record clock times.

**Pitfall:** a stated total that contradicts the clock times; the first inconsistency an auditor checks.

**4 • The code the time supports** the code follows the minutes

**Do:** 16 to 37 minutes support 90832; 38 to 52 support 90834; 53 or more support 90837; under 16, psychotherapy is not separately billable.

**Pitfall:** rounding up through a threshold; a 52-minute session billed as 90837 is upcoding.

**5 • Separate statement for combined E/M visits** two clocks, kept apart

**Do:** record psychotherapy time on its own, excluding every E/M minute; select the E/M level by medical decision-making.

**Pitfall:** one blended total for the whole visit; 6 of the 60 time failures in the OIG's national audit were exactly this.

**6 • Signature, credentials, and date signed** authenticate when rendered

**Do:** sign with credentials and date it; Medicare expects records "legible, complete, dated, timed, and authenticated."

**Pitfall:** a signature added weeks later; a requested signature attestation is due within 20 calendar days.

## Before you sign

- ☐ Time present in an accepted format
- ☐ Clock arithmetic matches the stated total
- ☐ Documented minutes support the code billed
- ☐ Psychotherapy minutes separate from any E/M time
- ☐ Non-therapy time excluded by name
- ☐ Signed with credentials on the day of service

## Drafting with AI

Give it a dictation, a transcript, or session bullets; ask for the time statement and a pre-sign gap check.

*"Check this note against 90834 and draft the time attestation: accepted format, consistent arithmetic, psychotherapy minutes separated from E/M: ..."*

**Never paste client-identifying information into consumer AI tools. BastionGPT is HIPAA-compliant with a signed BAA on every plan.**

**10 to 40 words**  
typical length

**1 to 2 min by hand**  
clinical team estimate

**Every timed-code session**  
when it's written

**Payers · auditors · billers**  
who reads it

# Start-Stop Time Attestation Template

Copy or print for your practice - Adapt fields to your organization's, payer's and jurisdiction's documentation requirements.

Lives inside the psychotherapy progress note: a data element, not a standalone document. Record time in either accepted format below; recording both keeps the arithmetic visible. Session times are not protected psychotherapy notes, so keep them in the progress note, where payers may review them.

Client (initials): \_\_\_\_\_

Date of service: \_\_\_\_\_

Clinician and credential: \_\_\_\_\_

## Service furnished

Anchor the minutes to one identifiable encounter

☐ Individual psychotherapy   ☐ Group   ☐ Telehealth   ☐ E/M plus psychotherapy add-on

## Format option A: start and stop clock times

When face-to-face psychotherapy began and ended; the strongest evidence when minutes are questioned. Record actual clinical time, not the booked appointment slot.

Time started: \_\_\_\_\_ Time stopped: \_\_\_\_\_ = Total minutes: \_\_\_\_\_

## Format option B: total time only

Medicare accepts total time alone; write the minutes out

Total face-to-face minutes: \_\_\_\_\_

Count face-to-face therapy time only: exclude intake paperwork, scheduling, documentation time, and any E/M time.

## Code supported by the documented minutes

The code follows the minutes; under 16 minutes, psychotherapy is not separately billable. Do not round up through a threshold.

☐ 90832 (16 to 37 min)   ☐ 90834 (38 to 52 min)   ☐ 90837 (53 or more min)

☐ Psychotherapy add-on with E/M: \_\_\_\_\_

## Same-day E/M service

Two clocks, documented apart; no minute counted toward both services

☐ No   ☐ Yes: E/M documented separately; E/M level selected by medical decision-making

Clinician signature / credentials: \_\_\_\_\_

Date signed: \_\_\_\_\_