Face-to-Face (F2F) Encounter - HOME HEALTH

The Affordable Care Act of 2010 (Section 6407) established a physician face-to-face encounter as a requirement of eligibility for Medicare home health services. The certifying physician must document that he/she, or a non-physician practitioner (NPP) working with the physician, has seen the patient. Effective Date: 1/1/2011 [Enforcement Date: 4/1/2011]

When must the F2F occur?

F2F encounter must occur no earlier than 90 days prior to (M0030) Start of Care Date or within 30 days after the Start of Care (S0C).

Who may perform the F2F encounter?

Certifying physician or qualified, collaborating non-physician practitioner (NPP) who is neither employed by or has a financial relationship with the home health agency.

NPP is defined as a nurse practitioner, physician's assistant, certified nurse midwife, or clinical nurse specialist who is working in collaboration with or supervised by the certifying physician or an acute/post-acute care physician. The certifying physician may use a visit note from F2F encounter performed by a collaborating NPP.

For patients admitted to home health immediately following an acute or post-acute facility stay, a physician who cared for the patient in the acute/post-acute facility (or an allowed NPP working with that physician) may perform the F2F encounter. The certifying physician documents that the encounter occurred (process through which the facility and/or home health agency communicates F2F visit to the certifying physician is not specifically mandated in regulation).

What must the F2F encounter documentation include?

Important Note:

CMS Final Rule for

Home Health CY

2021

allows allowed

non-physician

practitioners to

certify and order

home health

In many areas of

this document, the

term "physician"

means physician/

millionweed.

practitioner as

defined in the CY

2021 Final Rule for

Home Health

Services:

Effective date:

June 1, 2020

services.

(CMS-1730-F)

- The certifying physician/practitioner must document that the F2F encounter visit took place (regardless of who performed the encounter).
- The certifying physician/practitioner is required to certify that a F2F patient encounter:
 1) occurred no more than 90 days prior to the home health S0C (or within 30 days after S0C).
 - 2) was related to the primary reason for home health services, and
 - was performed by the certifying physician, an acute/post-acute, facility physician, or an allowed NPP.
 - The physician/practitioner must also document the date of the encounter as part of the certification of eligibility.
- Effective for episodes beginning on or after January 1, 2015, the <u>F2F narrative requirement is</u> eliminated. However, remember that:
 - CMS expects the certifying physician's and/or acute/post-acute facility's medical record to contain clinical documentation of the F2F patient encounter visit that justifies the referral for Medicare home health, the patient's need for skilled services, and homebound status.
 - Documentation from the certifying physician's and/or the acute/post-acute facility's medical records must be provided, upon request to the home health agency, review entities, and/or CMS.
 - The home health agency must be able to provide this documentation from the certifying physician and/or acute/post-acute facility to CMS and/or its contractors upon request.
- Home Health Agency (HHA) staff:
- May communicate information to the certifying physician about the patient's homebound status and need for skilled care. (The physician must review and sign off on any home health communication that is incorporated into the physician's own medical record.)
- May facilitate communication about the F2F encounter (for example, hospital discharge summary) between the acute/post-acute physician and the certifying physician.
- Must ensure the certification is complete prior to billing Medicare for services.
 - Physicians/practitioners should complete the certification when the Plan of Care (POC) is established, or as soon as possible thereafter. It is not acceptable for HHAs to wait until the end of the 60-day episode to obtain a completed certification.

Home health agencies should do the following to ensure compliance with the F2F requirement:

- Train all relevant staff on F2F regulations & guidance.
 Educate physicians & staff on their role/responsibility under the rule.
- Institute compliance assurance process to track qualifying encounters, required certifications, and supporting documentation, as needed.
- Establish policies and procedures to respond to circumstances in which the patient does not have a timely qualifying P2F.



Face To Encounter Guidelines

Sheila Curran Bernard, Kenn Rabin

Face To Encounter Guidelines:

Master Medicare Guide Wolters Kluwer Law & Business, 2015-02-25 The 2015 Master Medicare Guide is packed with timely and useful information to help you stay on top of one of the most complex programs administered by the federal government The 2015 Edition includes Over 500 explanation summaries for all aspects of the Medicare program coverage eligibility reimbursement fraud and abuse and administration Highlights of the Protecting Access to Medicare Act of 2014 P L 113 93 and the Improving Medicare Post Acute Care Transformation Act of 2014 P L 113 185 the most recent physician fee schedule reimbursement fix A focus on the continuing implementation of the Affordable Care Act as it relates to Medicare including accountable care organizations and a tighter link between the quality of health care and Medicare reimbursement All discussions include cross references to relevant laws regulations CMS manual sections administrative and judicial A Guide to Prayer for All Who Walk with God John S. Mogabgab, Rueben P. Job, Norman decisions and more Shawchuck, 2014-01-01 This book the fourth in The Upper Room's bestselling Guide to Prayer series offers a simple pattern of daily prayer built around weekly themes and organized by the Christian church year Each week follows this pattern Affirmation Psalm Psalm Prayer Daily Scripture Readings Silence Daily Reading Reflection Silent or Written Prayers Offering of Self to God Blessing The daily readings are drawn from the history of Christian spirituality and feature such writers as Francis of Assisi Teresa of Avila Dietrich Bonhoeffer Henri J M Nouwen Sue Monk Kidd Douglas Steere Jan Richardson Trevor Hudson Wendy M Wright and many others Beautifully bound in a leather like cover A Guide to Prayer for All Who Walk with God makes a perfect gift and a reliable companion for anyone seeking to deepen a steady life of prayer Guide for Celebrating® Reconciliation J. 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