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 (SOC).
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 (CMS-1730-F) allows allowed non-physician practitioners to certify and order home health services.
In many areas of this document, the term "physician" means physician/ allowed practitioner as defined in the CY 2021 Final Rule for Home Health Services.
Effective date: June 1, 2020
	• 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 SOC (or within 30 days after SOC), and
	  2) was related to the primary reason for home health services, and
	  3) was performed by the certifying physician, an acute/post-acute, facility physician, or an allowed NPP.
	  4) 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 F2F narrative requirement is 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 F2F.

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Patricia Kennedy

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