

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: - occurred no more than 90 days prior to the home health SOC (or within 30 days after SOC), and - 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 eliminated</u>. 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.



Face To Encounter Guidelines

Julia Schneider



Face To Encounter Guidelines:

Face To Encounter Guidelines Book Review: Unveiling the Power of Words

In some sort of driven by information and connectivity, the power of words has become more evident than ever. They have the capacity to inspire, provoke, and ignite change. Such may be the essence of the book **Face To Encounter Guidelines**, a literary masterpiece that delves deep in to the significance of words and their effect on our lives. Written by a renowned author, this captivating work takes readers on a transformative journey, unraveling the secrets and potential behind every word. In this review, we shall explore the book is key themes, examine its writing style, and analyze its overall impact on readers.

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Table of Contents Face To Encounter Guidelines

1. Understanding the eBook Face To Encounter Guidelines
 - The Rise of Digital Reading Face To Encounter Guidelines
 - Advantages of eBooks Over Traditional Books
2. Identifying Face To Encounter Guidelines
 - Exploring Different Genres
 - Considering Fiction vs. Non-Fiction
 - Determining Your Reading Goals
3. Choosing the Right eBook Platform
 - Popular eBook Platforms
 - Features to Look for in an Face To Encounter Guidelines
 - User-Friendly Interface
4. Exploring eBook Recommendations from Face To Encounter Guidelines
 - Personalized Recommendations
 - Face To Encounter Guidelines User Reviews and Ratings
 - Face To Encounter Guidelines and Bestseller Lists

5. Accessing Face To Encounter Guidelines Free and Paid eBooks
 - Face To Encounter Guidelines Public Domain eBooks
 - Face To Encounter Guidelines eBook Subscription Services
 - Face To Encounter Guidelines Budget-Friendly Options
6. Navigating Face To Encounter Guidelines eBook Formats
 - ePub, PDF, MOBI, and More
 - Face To Encounter Guidelines Compatibility with Devices
 - Face To Encounter Guidelines Enhanced eBook Features
7. Enhancing Your Reading Experience
 - Adjustable Fonts and Text Sizes of Face To Encounter Guidelines
 - Highlighting and Note-Taking Face To Encounter Guidelines
 - Interactive Elements Face To Encounter Guidelines
8. Staying Engaged with Face To Encounter Guidelines
 - Joining Online Reading Communities
 - Participating in Virtual Book Clubs
 - Following Authors and Publishers Face To Encounter Guidelines
9. Balancing eBooks and Physical Books Face To Encounter Guidelines
 - Benefits of a Digital Library
 - Creating a Diverse Reading Collection Face To Encounter Guidelines
10. Overcoming Reading Challenges
 - Dealing with Digital Eye Strain
 - Minimizing Distractions
 - Managing Screen Time
11. Cultivating a Reading Routine Face To Encounter Guidelines
 - Setting Reading Goals Face To Encounter Guidelines
 - Carving Out Dedicated Reading Time
12. Sourcing Reliable Information of Face To Encounter Guidelines
 - Fact-Checking eBook Content of Face To Encounter Guidelines
 - Distinguishing Credible Sources
13. Promoting Lifelong Learning

- Utilizing eBooks for Skill Development
 - Exploring Educational eBooks
14. Embracing eBook Trends
- Integration of Multimedia Elements
 - Interactive and Gamified eBooks

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