

## Face-To-Face (FTF) Encounters for Home Health Certification



Effective Date:	Required for start of care home health certifications on/after January 1, 2011.
Who – Performed by:	The certifying physician or qualified non-physician practitioner (NPP) <b>who is not employed by or has a financial relationship with</b> the home health agency as defined in §411.354, unless the financial relationship meets one of the exceptions set forth in §411.355 through §411.357. NPP is defined as a nurse practitioner, physician’s assistant, certified nurse midwife, or clinical nurse specialist.
When - Timeframe:	<ul style="list-style-type: none"> <li>• FTF must occur no earlier than 90 days prior to the start of care (SOC) or within 30 days after the SOC.</li> <li>• If the FTF encounter occurred within 90 days of the SOC but is not related to the primary reason for home health, the NPP or certifying physician must have a FTF encounter within 30 days after the SOC.</li> </ul>
Where - Location:	There is no requirement mandating where the FTF encounter takes place. In addition, Medicare eligible telehealth visits are allowed. See <a href="http://www.cms.gov/Telehealth">www.cms.gov/Telehealth</a> for more information on what constitutes telehealth services under Medicare.
What - Documentation Requirements:	<ul style="list-style-type: none"> <li>• The certifying physician must document the FTF visit took place regardless of who performed the FTF encounter.</li> <li>• If FTF encounter performed by NPP, must document clinical findings and provide these to the certifying physician.</li> <li>• Must be a separate and distinct section of, or an addendum to, the certification.</li> <li>• The documentation must include: <ul style="list-style-type: none"> <li>○ The date of the FTF encounter; and</li> <li>○ Clinical findings to support that the encounter was related to the primary reason for home care, the patient is homebound, and in need of Medicare covered home health services.</li> </ul> </li> <li>• Must be clearly titled, dated and signed by certifying physician.</li> <li>• HHAs <b>may not</b> formulate standard language on the certification forms related to the encounter.</li> </ul>
Additional Information:	<ul style="list-style-type: none"> <li>• FTF must be related to the primary reason for the home health admission.</li> </ul>
Resources:	<ul style="list-style-type: none"> <li>• Social Security Act, Section 1861(aa)(5): <a href="http://www.ssa.gov/OP_Home/ssact/title18/1861.htm#act-1861-aa-5">http://www.ssa.gov/OP_Home/ssact/title18/1861.htm#act-1861-aa-5</a></li> <li>• November 2, 2010 “Home Health Prospective Payment System Rate Update for Calendar Year 2011” Final Rule, pages 296 - 330 - <a href="http://edocket.access.gpo.gov/2010/pdf/2010-27778.pdf">http://edocket.access.gpo.gov/2010/pdf/2010-27778.pdf</a></li> <li>• <a href="#">December 1, 2010, Home Health &amp; Hospice Medicare A Newslines</a>, pgs 32-35</li> </ul>