

## Face-to-Face Encounter (F2F) Fast Facts

The Patient Protection and Affordable Care Act was signed into law on March 23, 2010, and included the Face-to-Face Encounter (F2F) requirements for both Certified Home Health and Hospice Providers. The Centers for Medicare and Medicaid (CMS) released the regulations for the Face-to-Face Encounter, and providers across the country have struggled to meet the standards detailed in the updated 2011 Home Health Final Rule.

### Face to Face (F2F) Clarity

CMS F2F Interpretive Guidelines are *pending* and expected by the last week of January. CMS agreed to a three-month transition period before enforcement of the F2F requirements. Additionally, CMS is taping physician F2F training accessible by all to be posted on YouTube in the next few weeks.

**Bottom Line:** Implement processes to track and monitor the F2F for your Medicare beneficiaries the first quarter of 2011. Modify processes, if indicated, with the release of the CMS F2F Interpretive Guidelines.

### F2F Home Health Fast Facts

- **Who Can Perform the F2F Encounter:** Physician, NP, CNS or PA who work with the physician; Hospitalists
- **Where:** Facility; Patient Home; CMS Approved Telehealth (very rare)
- **Time Frame:** 90 days before or within 30 days after admission to home health
- **Required Documentation:** By physician only; Must be PECOS (PECOS is the CMS registry of physicians who can make referrals to home health and DME)
- **Documentation Elements:** Date of F2F Encounter; Specific clinical findings that requires home health; Eligibility for Medicare Home Health, including homebound status and skilled care of nurse or therapist; physician signature and date. If the NP, CNS or PA performed the F2F Encounter, they must report findings to the physician to document the F2F elements.

### Considerations

- **Billing:** Providers may drop a RAP before completion of the F2F, BUT cannot bill a Final Claim without the F2F Encounter documentation. The F2F Encounter documentation is part of the initial certification (485) process.

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**F2F: Fast Facts**

- **Applies only to Medicare initial certifications, not recertifications**

**Summary**

**Fast track your implementation and monitoring of the F2F Encounter to ensure compliance by April 1, 2011.**

- **Monitor the CMS Web Site to ensure up to date information on additional written Provider Guidance.**
- **Contact your software vendors for further 485 addendum and customization per staff and physician feedback.**
- **Integrate F2F compliance processes into your current agency Compliance Program.**