

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.

- **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.**