Hospice Face-to-Face Encounter Final Rule Published

Summary at a Glance:

Late Tuesday afternoon, November 2nd, the Federal Register posted the final rule for the Hospice Face-to-Face Encounter as part of the Final Rule entitled: Medicare Program; Home Health Prospective Payment System Rate Update for Calendar Year 2011; Changes in Certification Requirements for Home Health Agencies and Hospices. Highlights in the final rule are as follows:

- A hospice physician, hospice Nurse Practitioner, or incident to/are physician rotating through the hospice may perform the face-to-face encounter.
- CMS clarified that the face-to-face encounter is based on benefit periods and not on actual days of care.
- Visit Timeframe is now 30 days. CMS has expanded the time frame for face-to-face encounter to 30 days prior to the start of the 180th-day recertification, and each subsequent recertification.
- CMS has changed the language in 418.22 (C)(4) from "must visit" to "have a face-to-face encounter" in order to make clear that the hospice has flexibility for the practitioner to see the patient – either at the patient's home or by the patient coming in to see the physician or NP.

Clarification that the face-to-face encounter is NOT billable. The billing regulations for hospice do not allow for physician reimbursement for administrative activities of physicians.

The Requirement:

The Affordable Care Act amends section 1814(a)(7) of the Social Security Act to require that on and after January 1, 2011, a hospice physician or nurse practitioner (NP) must have a face-to-face encounter with every hospice patient to determine the continued eligibility of that patient prior to the 180-day recertification, and prior to each subsequent recertification. Furthermore, the Affordable Care Act requires that the hospice physician or NP attest that such a visit took place, in accordance with procedures established by the Secretary of the HHS.

Specific provisions in the final rule:

1. Who Can Perform the Encounter?

Physicians:

- **Certifying terminal illness:** By statute, only a physician (not a NP) may certify a patient's terminal illness.
- **Definition of hospice physician:** A "hospice physician" is a physician either employed by or working under arrangement with a hospice (i.e., contracted).
- **Increased accountability:** By limiting "hospice physician" to those physicians who are employed by or working under contract with a hospice, CMS also increases accountability, as the hospice is in control of its employees and contracted physicians.

Face To Face Encounter Documentation Examples

Hussin A.Rothana

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