NEW MEDICARE FACE TO FACE REGULATIONS TO START ENFORCEMENT

A HOME HEALTH & HOSPICE SERVICE UPDATE

The Centers for Medicare & Medicaid Services (CMS) has announced that there will not be an extension of the trial period for enforcement of its new Face to Face Regulations. Effective April 1, 2011, CMS expects home health agencies and hospices have fully established internal processes to comply with the face-to-face encounter requirements mandated by the Affordable Care Act (ACA) for purposes of certification of a patient’s eligibility for Medicare home health services and of recertification for Medicare hospice services.

While Providence Home Health had initially chosen to implement this mandate for ALL insurance providers, after much consideration, Providence Home Health will now only require the face to face documentation for Medicare and Medicare secondary insurances.

How this affects your HOME HEALTH REFERRALS:

- Medicare patients being referred from your office will need to have had a face-to-face encounter 90 days prior or within the 30 days after start of home care.
- If your Medicare patient is hospitalized and needs home care services to begin upon discharge, and if a hospitalist is involved, that hospitalist will be asked to document the face to face encounter. The physician following the patient will continue to be responsible to review and sign off the plan of care.

For questions and guidance to meet this requirement, please call:

Shaune Mattsson  
Director, Providence Home Health  
503.215.4742

Woody English, MD  
Medical Director, Providence Home Health  
503.215.9470

How this affects your HOSPICE PATIENTS:

- Any patient on hospice 180 days and beyond will be required to have a face-to-face visit by the hospice medical director prior to recertification to determine appropriateness for continued hospice eligibility. A patient cannot refuse this visit, or services cannot continue and the patient will be discharged from service.
- If a patient is discharged from one hospice and wishes to be re-admitted to another, a face-to-face physician visit will be required in order to determine eligibility by the admitting hospice.
- The patient’s PCP cannot perform this visit. It is to be provided as a service by the employed hospice physician or nurse practitioner of the Medicare-certified hospice.

For questions and guidance to meet this requirement, please call:

Dorece Norris MD  
Medical Director, Providence Hospice  
503-215-8577-office  
503-519-4043-cell

For more information, go to: www.CMS.gov