

Part B Insider (Multispecialty) Coding Alert

Documentation: Doctors' Face-to-Face Requirement Could Do An About-Face

By 2015, your face-to-face requirement might be a thing of the past.

The Physician Fee Schedule wasn't the only proposal that CMS released last week—and one section in particular of the home health prospective payment system proposed rule could make your doctors' lives a little easier.

In the document, CMS announces plans to end the controversial physician narrative portion of the face-to-face (F2F) requirement for home health certification. "In an effort to simplify the face-to-face encounter regulations, reduce burden for HHAs and physicians, and to mitigate instances where physicians and HHAs unintentionally fail to comply with certification requirements, we propose that ... (t)he narrative requirement ... would be eliminated," CMS says in the proposed rule.

However: "The certifying physician would still be required to certify that a face-to-face patient encounter, which is related to the primary reason the patient requires home health services, occurred no more than 90 days prior to the home health start of care date or within 30 days of the start of the home health care and was performed by a physician or allowed non-physician ... and to document the date of the encounter as part of the certification of eligibility," CMS says.

Exception: "For instances where the physician is ordering skilled nursing visits for management and evaluation of the patient's care plan, the physician will still be required to include a brief narrative that describes the clinical justification of this need as part of the certification/recertification of eligibility," CMS notes. "This requirement was implemented in the CY 2010 HH PPS final rule ... and is not changing."

Don't count on your F2F relief right away since the fee schedule is merely a proposal, and reviewers looking at claims before the effective date would still be able to deny claims based on the requirement in effect at the time. Therefore, you should continue writing narratives until the rule takes effect.

Resource: See the proposed rule at www.ofr.gov/OFRUpload/OFRData/2014-15736_PI.pdf.