

## Part B Insider (Multispecialty) Coding Alert

### In other news

The face to face hospice encounter requirement is causing hospices massive confusion as they struggle to implement the mandate. Although the "enforcement date" has been pushed back to April 1, agencies are still trying to comply with the Jan. 1 implementation date.

For example: One South Carolina reader is having trouble getting physicians to sign and document the FFE because another agency is allowing physician assistants to do so. The FFE final rule, published in the Nov. 17 Federal Register, makes clear that the certifying physician must sign the FFE documentation, even if the FFE is made by the physician's affiliated non-physician practitioner such as a nurse practitioner or clinical nurse specialist who is working in collaboration with the physician, a certified nurse-midwife, or a physician assistant under the supervision of the physician.

"If a NPP performed the encounter, the NPP would communicate the patient's clinical information obtained during the encounter to the certifying physician," the final rule says.

Help: CMS on Jan. 14 added 11 new frequently asked questions and answers to its FFE list (see the link to the FAQs at [www.cms.gov/center/hha.asp](http://www.cms.gov/center/hha.asp) -- scroll down to the Dec. 22 post).