

Eli's Hospice Insider

Compliance: F2F Enforcement Is Here, But Advocates Still Working For Reform

Industry groups tracking F2F results to gather evidence against the requirement.

Just because hospices are working hard to comply with the physician face-to-face encounter rule now that the enforcement date has passed doesn't mean you should give up on relief from the new burden.

The **National Association for Home Care & Hospice** is tracking the results of the F2F requirement with a one-page survey providers fill out weekly. "The purpose of this tracking effort is to gather the data needed to support advocacy efforts to rescind and reform the face-to-face encounter requirement," NAHC says in its member newsletter. "The potential for doing so hinges on whether patients are adversely affected in terms of their access to care."

Using a weekly survey aims to "provide near real-time identification of outcome concerns that could spur Congress into action on the issue," NAHC adds. The survey focuses on three potential adverse outcomes for patients: (1) denial of access at admission; (2) delayed admission; and (3) loss of access after the 30-day period from the start of care in which the encounter must be completed.

The **Visiting Nurse Associations of America** is also monitoring for F2F problems, the trade group says in a release. VNAA is working "with VNAA members and others to document and report the problems implementing this provision that will most certainly delay or limit access to care for some patients," it notes.

"We are deeply disappointed that more time was not provided as there was a strong consensus among diverse groups that it takes about six months for an educational and system change of this magnitude," VNAA's **Andy Carter** says in the release. "Our nonprofit members are most likely to take the risk of serving patients who may not have a primary care physician and may not be able to get the documentation done within the timeframe."

Resource: VNAA has F2F sample documents, some of which are accessible to the public, at <http://vnaa.co/F2Fhelp>.