

Eli's Hospice Insider

Face-To-Face: Know New Hospice F2F Ropes Or Risk Compliance, And Reimbursement

CMS clarifies what to do when the face-to-face requirement isn't fulfilled.

Complying with the hospice face-to-face physician encounter requirement will get a little easier under new rules taking effect Oct. 1, but tripping up on your F2F documentation will get easier too.

"We are finalizing the policy to allow any hospice physician to perform the face-to-face encounter regardless of whether that same physician recertifies the patient's terminal illness and composes the recertification narrative," the **Centers for Medicare & Medicaid Services** says in the 2012 wage index final rule published in the Aug. 4 Federal Register. Hospices that use this policy must remember to take the next step beyond the encounter. New regulatory language will "state that the attestation of the nurse practitioner or a non-certifying hospice physician shall state that the clinical findings of that encounter were provided to the certifying physician, for use in determining continued eligibility for hospice," CMS says in the rule.

CMS loosened up the hospice physician requirement, but it turned down commenter suggestions to allow physician assistants or clinical nurse specialists to conduct the F2F encounter. That's because it's prohibited by the statutory language in the Affordable Care Act, CMS maintains.

CMS also rejected commenter suggestions to allow community physicians and nurse practitioners to conduct the F2F visit. "The Act requires that the physician or NP conducting the face-to-face encounter must be a hospice physician or NP," CMS says in the rule.

Bill For Non-F2F Part Of Doc Visits

Commenters also bemoaned the cost of conducting unreimbursed F2F visits. "We expect most face-to-face encounters would be satisfied in conjunction with a medically reasonable and necessary physician service," CMS says in response. "Hospices can bill for that portion of the visit where medically reasonable and necessary physician services were provided."

Tip: Don't forget to appropriately document such doc services in the patient record and distinguish them from the F2F encounter, reminds the **National Association for Home Care & Hospice**.

One commenter asked CMS to make the new rule retroactive to the beginning of the F2F requirement. But CMS maintains that the provision takes effect Oct. 1, 2011.

Note: The final rule is at www.gpo.gov/fdsys/pkg/FR-2011-08-04/pdf/2011-19488.pdf.