

MDS Alert

READER QUESTION: Would This Physician's Initial Certification for SNF Care Fly With the FI/MAC?

Question: Can a hospitalist sign the initial cert for Part A SNF services? Our SNF is a freestanding SNF.

Answer: "If the hospitalist is the attending physician, then I would say that it is okay for him/her to sign," says **Marilyn Mines, RN, BC, RAC-CT**, manager of clinical services for FR&R Healthcare Consulting Inc. in Deerfield, Ill. She points to the following language in the Medicare General Information, Eligibility and Entitlement Manual, Chapter 4 (www.cms.hhs.gov/manuals/downloads/ge101c04.pdf):

"A certification or recertification statement must be signed by the attending physician or a physician on the staff of the skilled nursing facility who has knowledge of the case or by a nurse practitioner or clinical nurse specialist who does not have a direct or indirect employment relationship with the facility, but who is working in collaboration with the physician."

"If the SNF is a hospital-based unit, and the hospitalist is employed by the hospital and seeing patients in the SNF, the hospitalist would qualify as a physician on staff at the SNF," says **Ronald Orth, RN, NHA, CPC, RAC-MT**, president of Clinical Reimbursement Solutions LLC in Milwaukee, Wis.

"The reader might check with the SNF's MAC/FI for clarification," Orth suggests. "If the hospitalist wasn't in a position to sign the initial certification [e.g., wasn't the attending physician], the SNF could potentially get a delayed certification," says Orth.