

Health Information Compliance Alert

Home Health F2F Compliance: Ensure Your Face-To-Face Documentation Passes Muster

OIG's investigation of F2F compliance could get ugly.

You need to keep your F2F documentation squeaky clean to ensure compliance. The **Health & Human Services Office of Inspector General** says in its recently released Work Plan for 2013 that it will "determine the extent to which home health agencies ... are complying" with the F2F requirement, which mandates an encounter with a qualifying doc or NPP up to 90 days before or 30 days after home care begins. Before the F2F requirement took effect, about 30 percent of home care patients met this standard, the OIG notes.

The OIG's findings may be relatively positive if it focuses only on whether the patient met with the physician or NPP, observers expect. But if the OIG decides to focus on whether docs' F2F documentation complies, it could be a different story.

The OIG's scrutiny of F2F is likely to lead to reimbursement recoupment for non-compliant agencies, warns attorney **Robert Markette Jr.** with **Benesch, Friedlander, Coplan & Aronoff** in Indianapolis. "Agencies need to be diligently checking that they are meeting the face-to-face requirements," Markette urges.

The OIG Work Plan addresses at least 10 subjects related directly to home care, but it leaves out some compliance issues that concern providers the most, insists Washington, D.C.-based health care attorney **Elizabeth Hogue**. Agencies are worried about "real abuses" such as "payments to referral sources and violations of patients' rights to freedom of choice," Hogue tells **Eli**.