

### Medicare Advisory: Physician Face-to-Face Encounters With Home Health Patients

*Issue Briefing: December 2010*

In accordance with the Affordable Care Act, the Centers for Medicare & Medicaid Services issued its final regulation, which requires home health patients to have a physician face-to-face encounter prior to the certification of need for services. Effective January 1, 2011, the face-to-face encounter must occur 90 days prior to or within 30 days after the start of home health services.

A nurse practitioner, clinical nurse specialist or physician's assistant may carry out the face-to-face encounter; however, their clinical findings must be communicated to the physician certifying home healthcare. **Only the physician can order home health services, certify that a face-to-face encounter occurred, document that other eligibility criteria are met (medical necessity and homebound status), and verify both the face-to-face certification statement and the home health plan of care with a signature and date.**

When the patient is being discharged from an inpatient facility setting, the inpatient facility physician is allowed to sign and date the face-to-face encounter statement.

\*\*\* Home health agencies will no longer be allowed to date-stamp receipt of orders. Physicians are required by Medicare to date in writing both the certification statement and the plan of care. \*\*\*

The face-to-face encounter must be

- made by the physician responsible for certifying home health (or nonphysician practitioner as described above);
- related to the primary reason for which the patient requires home health services; and
- completed 90 days prior to or within 30 days after the start of home health services.

The responsible physician (and **NOT** the nonphysician practitioner) must document this face-to-face encounter on the home health plan of care or on the plan of care addendum that is provided by the home health agency.

Documentation for certifying face-to-face encounters must include the following:

- Encounter date
- Indication that encounter was related to the primary reason for home health services
- Explanation of why the clinical findings of the encounter support the need for skilled nursing or therapy services
- Explanation of why the clinical findings of the encounter support the patient's homebound status
- Physician signature and date

*Continued*

---

This advisory has been brought to you on behalf of MaineHealth's home health agencies. If your office requires further clarification on these important home health regulations, please contact your local home health agency as noted below:

**CHANS Home Health Care — Mid Coast Hospital**

60 Baribeau Drive  
Brunswick, ME 04011  
1-207-729-6782

**HomeHealth Visiting Nurses — MaineHealth**

15 Industrial Park Road  
Saco, ME 04072  
1-800-660-4867

**HealthReach HomeCare & Hospice — MaineGeneral Health**

10 Water Street, Suite 307  
Waterville, ME 04901  
1-800-427-1127

**Miles & St. Andrews Home Health & Hospice — Lincoln County Healthcare**

40 Belvedere Road  
Damariscotta, ME 04543  
1-800-636-6125

**SMMC Visiting Nurses — Southern Maine Medical Center**

72 Main Street  
Kennebunk, ME 04043  
1-800-794-3546

**Kno-Wal-Lin Home Care & Hospice — Pen Bay Health Care**

170 Pleasant Street  
Rockland, ME 04841  
1-800-540-9561

**Waldo County Home Health & Hospice — Waldo County Healthcare**

PO Box 407  
Belfast, ME 04915  
1-888-254-5133