

HOME HEALTH DENIAL FACT SHEET

Denial Reason 5HC01: Missing/Incomplete/Untimely Face-to-Face Encounter

<p>What is the face-to-face encounter?</p>	<p>As part of the certification, a face-to-face (FTF) encounter with the patient must be performed by the certifying physician, a physician who cared for the patient in the acute or post-acute care facility (with privileges) or an allowed non-physician practitioner (NPP). Information about NPPs who are allowed to perform the encounter are provided in the Medicare Benefit Policy Manual (CMS Pub. 100-02, Ch. 7) section 30.5.1.1 (https://www.cms.gov/Regulations-and-Guidance/Guidance/Manuals/downloads/bp102c07.pdf).</p>
<p>What is the timeframe for the FTF encounter?</p>	<p>The FTF must occur within 90 days prior to the start of care (SOC) or 30 days after the SOC. The FTF documentation must confirm the encounter occurred within this timeframe.</p>
<p>Who can perform the FTF encounter?</p>	<p>The FTF must be performed by one of the following:</p> <ul style="list-style-type: none"> • The certifying physician; • A physician who cared for the patient in an acute or post-acute facility during a recent stay, and has privileges at the facility; or • A qualified non-physician practitioner (NPP) working: <ul style="list-style-type: none"> - In collaboration with an acute or post-acute care physician, with privileges, who cared for the patient in the acute or post-acute facility; or - Under the supervision of the certifying physician or under supervision of an acute or post-acute care physician who has privileges and cared for the patient in the acute or post-acute facility.
<p>How is the FTF encounter documented?</p>	<p>Documentation in the certifying physician's medical records and/or the acute/post-acute care facility's medical records is used as the basis for determining patient eligibility for the Medicare home health benefit.</p> <p>The certifying physician and/or acute/post-acute care facility medical records must include:</p> <ul style="list-style-type: none"> • Information justifying the referral for home health services. This includes documentation showing the patient's: <ul style="list-style-type: none"> - Need for the skilled services; and - Homebound status. • The actual clinical note for the FTF encounter visit that demonstrates that the encounter: <ul style="list-style-type: none"> - Occurred within the required timeframe (include the date of the FTF encounter); - Was related to the primary reason the patient requires home health services; and - Was performed by an allowed provider type. <p>Information from the home health agency can be incorporated into the certifying physician's medical record for the patient and used to support the patient's homebound status and need for skilled care. This information must be corroborated by other medical record entries in the certifying physician's and/or the acute/post-acute care facility's medical record for the patient and be signed and dated by the physician to indicate acceptance into their medical record.</p>

<p>What is important to remember?</p>	<ul style="list-style-type: none"> • The FTF requirement is a condition of payment. If the FTF is not done, or not documented sufficiently, claims may be denied. • The certifying physician or an allowed non-physician practitioner (NPP) may sign the FTF encounter documentation, • The FTF encounter documentation must be completed, signed and dated by the certifying physician or an allowed NPP prior to claims submission. <ul style="list-style-type: none"> - HHAs should delay submitting the claim until all FTF requirements are met, and documentation has been received. • It is the home health agency's responsibility to: <ul style="list-style-type: none"> - Ensure that the FTF occurs timely; - Ensure that all FTF requirements are met; - Ensure the physician's documentation is complete before billing.
<p>Where do I find more information?</p>	<ul style="list-style-type: none"> • Medicare Benefit Policy Manual (CMS Pub. 100-02, Ch. 7) section 30.5.1.1 http://www.cms.gov/Regulations-and-Guidance/Guidance/Manuals/downloads/bp102c07.pdf • CGS Face-to-Face Encounters for Home Health Certification Quick Resource Tool, http://www.cgsmedicare.com/hhh/education/materials/pdf/FTF.pdf • CGS Home Health Face-to-Face Frequently Asked Questions (FAQs), http://www.cgsmedicare.com/hhh/education/faqs/FTF_FAQs.html • CGS Home Health Face-to-Face Encounter Web page, http://www.cgsmedicare.com/hhh/coverage/HH_Coverage_Guidelines/HH_FTF_encounter.html