



SENIOR & LONG TERM CARE DIVISION

COMMUNITY SERVICES BUREAU

Home Health Policy Manual

Title: Home Health Policy 406
Section: ELIGIBILITY FOR SERVICES
Subject: Face to Face Encounters
Reference: ARM 37.40.702, 42 CFR 440.70
Supersedes: Policy 406, Issued 05/01/1999

FACE TO FACE (FTF) ENCOUNTERS

FTF encounters, related to the primary reason that a member requires home health services, are required for the following:

1. For the initiation of Home Health services:
 - a. The encounter must occur within the 90 days before or 30 days after the start of Home Health services; and
2. For the initiation of Home Health medical supplies, equipment, and appliances:
 - a. The encounter must occur no more than six months prior to the start of services.

NOTE: FTF member encounters may occur through telehealth.

AUTHORIZATION TO CONDUCT FTF ENCOUNTERS

FTF encounters, for the initiation of Home Health services, may be performed by:

1. A physician;
2. A nurse practitioner or a clinical nurse working in collaboration with the physician;
3. A certified nurse midwife;
4. A physician assistant, under the supervision of the member's physician; and
5. An attending acute or post-acute physician if the member is admitted to Home Health immediately after an acute or post-acute stay.

The allowed non-physician practitioner (NPP) performing the FTF encounter must communicate the clinical findings of the FTF encounter to the ordering physician. The clinical findings must be

incorporated into the written or electronic document included in the member's medical record.

FTF encounters, for the initiation of medical supplies, equipment and appliances, may be performed by:

1. A physician;
2. A nurse practitioner or a clinical nurse working in collaboration with the physician;
3. A physician assistant, under the supervision of the member's physician; and
4. An attending acute or post-acute physician if the member admitted to Home Health immediately after an acute or post-acute stay.

FTF DOCUMENTATION REQUIREMENTS

An FTF encounter requires the following information:

1. Document and the addendum must be clearly titled as "Face to Face";
2. Member's full name;
3. Date of FTF encounter;
4. Description of the member's current individual clinical findings; and
5. Explanation of how the clinical findings support the need for skilled care.

The following is also required:

1. The certifying physician's signature which must be dated or the document must show the date received by the HH agency; and
 - a. A NPP can conduct the FTF but may not sign the document.
 - b. The physician must sign and date the document.
 - c. The Home Health agency **may not** draft the document for the physician to sign.
2. All information on the document must be legible.

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PHYSICIAN'S RESPONSIBILITY

To assure clinical correlation between the FTF encounter and the associated Home Health services, the physician responsible for ordering the services must:

1. Document the FTF encounter which is related to the primary reason the member requires Home Health services, occurred within the required timeframes prior to the start of Home Health services; and
2. Must indicate the practitioners who conducted the encounter, and the date of the encounter.

HOME HEALTH AGENCY RESPONSIBILITIES

As the billing entity, the Home Health agency's responsibility is to:

1. Facilitate and coordinate between the member and the physician to ensure that the FTF encounter occurs in a timely manner;
2. Ensure that all FTF encounter requirements are met;
3. Ensure that the physician's documentation is complete; and
4. To delay submission of claims until the documentation is complete.

NOTE: FTF encounters are a Medicaid requirement for payment. Payment will be recovered if the FTF documentation is found to be missing or incomplete.