

# COVID-19 UPDATE



## 4/30/20: CMS Updates Face to Face Home Health Requirement

### Situation

Effective April 30, 2020, CMS is requiring that the practitioner who certifies home health for a patient is required to perform the Face to Face encounter, unless the patient is being admitted directly to home health from an acute or post-acute facility and has had a F2F encounter with an allowed practitioner in the facility. Advocate Aurora Health at Home will continue to follow its relaxed F2F requirements for COVID-19 Surge Levels 3, 4 and 5.

### Background

If the physician or an NPP had been F2F with the patient within 90 days prior to the Home Health Start of Care (SOC) for a reason related to the need for home care, that visit meets the CMS F2F requirement. A F2F visit may also be completed up to 30 days after the Home Health SOC.

Historically, Home Health agencies have been unwilling to admit a patient without the F2F on record because patients often do not see their physician within the 30 days and the agency is then not paid for the initial or subsequent episodes of care.

### Assessment/Recommendation

Accept new CMS guidelines effective immediately

1. Effective April 30, the CARES Act permanently allow nurse practitioners and physician assistants to certify eligibility for the Medicare home health benefit, establish and review the plan of care and supervise the provision of items and services for home health beneficiaries. **The certifying practitioner is required to make the F2F encounter, unless the patient is being admitted directly to home health from an acute or post-acute facility and has had a F2F encounter with an allowed practitioner in the facility.**

*For more information regarding certification and requirements for documenting the face to face encounter; please refer to: Section 40.1.2.2, Chapter 7 of the "Medicare Benefit Policy Manual" at*

<http://www.cms.gov/Regulationsand-Guidance/Guidance/Manuals/downloads/bp102c07.pdf>.

2. Advocate Aurora Health at Home will continue to follow CMS guidelines for a F2F telehealth visit. An acceptable F2F Telehealth visit may be completed using telehealth, which may include computer or a phone with audio and video capability and include the use of the following nonpublic-facing platforms:
  - a. Skype
  - b. Zoom
3. When individual AAH hospitals reach Surge Levels 3 thru 5, Advocate Aurora's home health agency will accept F2F documentation at time of referral and up to 30 days after Home Health SOC.

**(more)**

## 5 Levels of Escalation for Home Health F2F Requirements

| <b>Individual<br/>Hospital<br/>Surge Level</b> | <b>Hospital Description</b>                                       | <b>Advocate Aurora Health at Home:<br/>Home Health Face to Face</b>                                                                                               |
|------------------------------------------------|-------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Level<br/>5</b>                             | Temporary/Pop Up Acute sites created in non-health care locations | F2F required either 90 days prior or 30 days after Home Health Start of Care for both Illinois and Wisconsin. Follow new CMS guidelines for Telehealth F2F visit. |
| <b>Level<br/>4</b>                             | Targeted ambulatory sites repurposed for non-COVID 19 care        | F2F required either 90 days prior or 30 days after Home Health Start of Care for both Illinois and Wisconsin. Follow new CMS guidelines for Telehealth F2F visit. |
| <b>Level<br/>3</b>                             | ICUs expanded into other units such as PACU                       | Business as usual. F2F documentation required at time of referral in Illinois; within 30 days in Wisconsin. Follow new CMS guidelines for Telehealth F2F visit.   |
| <b>Level<br/>2</b>                             | COVID-19 units established at all acute sites                     | Business as usual. F2F documentation required at time of referral in Illinois; within 30 days in Wisconsin. Follow new CMS guidelines for Telehealth F2F visit.   |
| <b>Level<br/>1</b>                             | COVID-19 protocols in place                                       | Business as usual. F2F documentation required at time of referral in Illinois; within 30 days in Wisconsin. Follow new CMS guidelines for Telehealth F2F visit.   |