

Hospice Face-to-Face Encounter Final Rule Published

Summary at a Glance:

Late Tuesday afternoon, November 2nd, the Federal Register posted the final rule for the Hospice Face-to-Face Encounter as part of the Final Rule entitled: Medicare Program; Home Health Prospective Payment System Rule Update for Calendar Year 2011; Changes in Certification Requirements for Home Health Agencies and Hospices. Highlights in the final rule are as follows:

- A hospice physician, hospice Nurse Practitioner, or incident/fellow physician rotating through the hospice may perform the face-to-face encounter.
- CMS clarified that the face-to-face encounter is based on benefit periods and not on actual days of care.
- Visit Timeliness is now 30 days. CMS has expanded the time frame for face-to-face encounters to 30 days prior to the start of the 180-day recertification, and each subsequent recertification.
- CMS has changed the language to 418.22 (CJ4) from "must visit" to "have a face-to-face encounter" in order to make clear that the hospice has flexibility for the practitioner to see the patient – either at the patient's home or by the patient coming to see the physician or NP.

Clarification that the face-to-face encounter is NOT billable. The billing regulations for hospices do not allow for physician reimbursement for administrative activities of physicians.

The Requirement:

The Affordable Care Act amends section 1814(a)(17) of the Social Security Act to require that on and after January 1, 2011, a hospice physician or nurse practitioner (NP) must have a face-to-face encounter with every hospice patient to determine the continued eligibility of that patient prior to the 180-day recertification, and prior to each subsequent recertification. Furthermore, the Affordable Care Act requires that the hospice physician or NP attest that such a visit took place, in accordance with procedures established by the Secretary of the HHS.

Specific provisions in the final rule:

1. Who Can Perform the Encounter?

Physicians:

- **Certifying terminal illness:** By statute, only a physician (not a NP) may certify a patient's terminal illness.
- **Definition of hospice physician:** A "hospice physician" is a physician either employed by or working under arrangements with a hospice (i.e., contractors).
- **Increased accountability:** By limiting "hospice physician" to those physicians who are employed by or working under contract with a hospice, CMS also increases accountability, as the hospice is in control of its employees and contracted physicians.

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Table of Contents Sample Of Face To Face Encounter

1. Understanding the eBook Sample Of Face To Face Encounter
 - The Rise of Digital Reading Sample Of Face To Face Encounter
 - Advantages of eBooks Over Traditional Books
2. Identifying Sample Of Face To Face Encounter
 - Exploring Different Genres
 - Considering Fiction vs. Non-Fiction
 - Determining Your Reading Goals
3. Choosing the Right eBook Platform
 - Popular eBook Platforms
 - Features to Look for in an Sample Of Face To Face Encounter
 - User-Friendly Interface
4. Exploring eBook Recommendations from Sample Of Face To Face Encounter
 - Personalized Recommendations
 - Sample Of Face To Face Encounter User Reviews and Ratings
 - Sample Of Face To Face Encounter and Bestseller Lists
5. Accessing Sample Of Face To Face Encounter Free and Paid eBooks
 - Sample Of Face To Face Encounter Public Domain eBooks
 - Sample Of Face To Face Encounter eBook Subscription Services
 - Sample Of Face To Face Encounter Budget-Friendly Options
6. Navigating Sample Of Face To Face Encounter eBook Formats

- ePub, PDF, MOBI, and More
- Sample Of Face To Face Encounter Compatibility with Devices
- Sample Of Face To Face Encounter Enhanced eBook Features
- 7. Enhancing Your Reading Experience
 - Adjustable Fonts and Text Sizes of Sample Of Face To Face Encounter
 - Highlighting and Note-Taking Sample Of Face To Face Encounter
 - Interactive Elements Sample Of Face To Face Encounter
- 8. Staying Engaged with Sample Of Face To Face Encounter
 - Joining Online Reading Communities
 - Participating in Virtual Book Clubs
 - Following Authors and Publishers Sample Of Face To Face Encounter
- 9. Balancing eBooks and Physical Books Sample Of Face To Face Encounter
 - Benefits of a Digital Library
 - Creating a Diverse Reading Collection Sample Of Face To Face Encounter
- 10. Overcoming Reading Challenges
 - Dealing with Digital Eye Strain
 - Minimizing Distractions
 - Managing Screen Time
- 11. Cultivating a Reading Routine Sample Of Face To Face Encounter
 - Setting Reading Goals Sample Of Face To Face Encounter
 - Carving Out Dedicated Reading Time
- 12. Sourcing Reliable Information of Sample Of Face To Face Encounter
 - Fact-Checking eBook Content of Sample Of Face To Face Encounter
 - Distinguishing Credible Sources
- 13. Promoting Lifelong Learning
 - Utilizing eBooks for Skill Development
 - Exploring Educational eBooks
- 14. Embracing eBook Trends
 - Integration of Multimedia Elements
 - Interactive and Gamified eBooks

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