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## **Home Health Certification and Face-toFace Encounter**

As a condition for payment for home health services, the Affordable Care Act mandates that, prior to certifying a patient's eligibility for the home health benefit, the certifying physician must document that he or she, or an allowed non-physician practitioner (NPP), has had a face-to-face encounter with the patient. An allowed NPP is defined as a PA, NP, CNM, or CNS.

Key elements of the new rule include:

- Documentation of the face-to-face encounters must be present on certifications for patients with starts of care on and after January 1, 2011.
- As part of the certification form itself, or as an addendum to it, the physician must document:
  1. when the physician or allowed NPP saw the patient, and
  2. how the patient's clinical condition as seen during that encounter supports the patient's homebound status and need for skilled services.
- The face-to-face encounter must occur within the 90 days prior to the start of home health care, or within the 30 days after the start of care.

In many cases, home health agencies will not initiate home care services without the certification form documenting the above requirements and **signed by a physician**.

While the PA may complete the face-to-face encounter, the physician must "certify" that the visit occurred by signing the completed form. For complete information regarding this new rule, refer to the [MLN Matters Article](#) published by CMS, or review the CMS rule itself found in [Transmittal 139](#). (click on hyperlinks)

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