



## CMS Home Health Pre-Claim Review Update #2

9/13/2016

### Situation

On August 3, 2016, Illinois began participation in a CMS Home Health Pre-Claim Review demonstration project. After 30 days in the demonstration project, Advocate at Home found that:

1. More than 25% of admissions did not meet the CMS documentation requirements – we were unable to obtain necessary documentation, even 30 days post referral.
2. Completing a separate Face to Face form, even the CMS form, is no longer acceptable.

### Background

CMS is Looking for Ways to Reduce Fraud

1. Illinois and other demonstration states were chosen due to their high rate of Home Health fraud.
2. While burdensome for everyone, Advocate at Home has always collected documentation necessary to support Medical Necessity. We have done so to provide the right patient care and to protect Advocate and our physicians from allegations of fraud.

### Assessment

1. Delays in receiving CMS required documentation at the time of referral:
  - a. Affect patient safety and effective hand offs to Home Health
  - b. Prevent Advocate at Home, and other Home Health agencies, from being able to bill for service provided to patients. Based on our initial experience, we will potentially face millions of dollars in write offs if today's processes do not change.
  - c. Have already caused area Home Health agencies to close.

### New Requirements

Beginning Monday Oct 3, 2016 Advocate at Home:

1. **Will require Face to Face (F2F) encounter elements be documented in the physician progress note. Separate F2F forms will not be accepted.**
2. **Will require the following documentation at the time of referral.**
  - a. A physician order
  - b. A physician progress note written by a Physician, Resident, APN or PA documenting **all** of the required F2F encounter elements
  - c. Physician certification statement signed by the physician
    - i. Name of community physician if certifying physician is not following the patient

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## Checklist for HH Referrals – Physician Documentation

Beginning Monday Oct 3, 2016 Advocate at Home:

1. **Will require Face to Face (F2F) encounter elements be documented in the physician progress note.** Separate F2F forms will not be accepted.
2. **Will require the following documentation at the time of referral.**
  - a. A physician order
  - b. A physician progress note written by a Physician, Resident, APN or PA documenting **all** of the required F2F encounter elements:
    - i. Date of visit (within 90 day prior/30 days after Home Health start of care date)
    - ii. Documentation that patient was treated during the encounter for the primary reason for Home Health services
    - iii. Narrative documentation – why patient requires skilled home health
    - iv. Narrative documentation – why patient is homebound – 2 reasons
    - v. Physician, Resident, APN or PA signature, credentials and date
  - c. Physician certification statement signed by the physician
    - i. “I certify/recertify that this patient is confined to his/her home (and meets homebound criteria) and needs intermittent skilled nursing care, physical therapy and/or speech therapy or continues to need occupational therapy. The patient is under my care, and a plan of care has been initiated and will periodically be reviewed by a physician. I (or an acute/post acute physician or collaborating NPP) had a Face-to-Face encounter with this patient on the above date, during which the primary reason for home health services was addressed. I have a clinical note (supporting documentation) documenting my encounter with the patient in the patient’s medical record to support certification and eligibility for home care, and will make it available to Advocate Home Health Services upon request.”
    - ii. “I am the certifying physician and will follow the patient in the community.” *or*
    - iii. “I am the certifying physician, but Dr. (Name and Credentials) will follow the patient in the community.”
    - iv. Certifying Physician Signature/Credentials
    - v. Certification Date
    - vi. Physician Printed Name

## Options for Documenting

1. Use CareConnection Templates for:
  - a. Complete a Physician Progress Note using the F2F Power Note
  - b. Complete the Physician Certification Statement
2. Use CareConnection and enter your own Physician Progress Note
  - a. Document the required F2F elements (noted above) in the Physician Progress Note.
  - b. Physician Certification Statement can be included in the Physician Progress Note i. Or a paper Physician Certification Statement can be used with the electronic note
3. Use Another EMR/Medical Record
  - a. Document the required F2F elements (noted above) in the Physician Progress Note.
  - b. Physician Certification Statement can be included in the Physician Progress Note i. Or a paper Physician Certification Statement can be used with the electronic note
  - c. At the time of referral, include a copy of the Physician Progress Note, and if not embedded in the note, a copy of the Physician Certification Statement