

HOSPICE DENIAL FACT SHEET

Denial Reason 5FFTF: Face-to-Face Encounter is Missing/Incomplete/Untimely

What is a face-to-face (FTF) encounter?	A FTF encounter is a requirement for Medicare payment of hospice services. The FTF encounter must occur prior to the start of the third benefit period, and with each subsequent benefit period. The FTF must be completed by a hospice employed or contracted MD/DO, or a hospice employed nurse practitioner (NP). The FTF encounter and documentation is required for the physician's certification to be complete.
What is the timeframe for the FTF encounter?	<p>The FTF encounter must be performed no more than 30 calendar days prior to the start of the third benefit, and each subsequent benefit period.</p> <p>In cases where a hospice admits a patient in a third or later benefit period, an exceptional circumstance may prevent the FTF from occurring. Examples of exceptional circumstances includes:</p> <ul style="list-style-type: none"> • An emergency weekend admission • CMS data systems are unavailable, and the hospice is unaware the patient is in a third or later benefit period. <p>When documented as such, exceptional circumstances where the FTF occurs within 2 days after admission are considered timely. In addition, when a patient dies within 2 days of the admission without a FTF, the FTF is deemed complete.</p>
What if the FTF encounter is not done timely?	<p>When the FTF encounter is untimely, the beneficiary is no longer considered terminally ill and no longer qualifies for the Medicare hospice benefit. If the FTF encounter is untimely, the hospice:</p> <ul style="list-style-type: none"> • Should continue to provide care for the beneficiary until the encounter occurs, at the agency's expense; and • Can readmit the beneficiary once the encounter occurs if the beneficiary still qualifies and he/she signs a new election statement.
What should the FTF encounter document include?	<p>For the FTF to be complete the following requirements must be met:</p> <ul style="list-style-type: none"> • Physician or nurse practitioner attests in writing that the FTF encounter occurred • The attestation is a separate and distinct section of, or an addendum to the re-certification • The FTF documentation is clearly titled as such • The FTF documentation includes the date of the encounter and a legible signature of the physician or NP that performed the encounter • If the FTF encounter is completed by a hospice-employed NP, the attestation statement must indicate that the clinical finding were communicated to the certifying physician for use in determining terminal status <p>Things to remember:</p> <ul style="list-style-type: none"> • The FTF encounter must be signed, along with the certification, prior to billing the claim. Claims will be denied if the certification and/or FTF encounter documents are not signed prior to the claim being billed. • The FTF encounter must occur prior to the certifying physician signing the certification and composing the certification narrative.

Where do I find more information?

- CGS *Hospice Face to Face (FTF) Encounter* Web page: http://www.cgsmedicare.com/hhh/coverage/Hospice_FTF_Encounter.html
- CMS Hospice FTF Encounters Q & A: <https://questions.cms.gov/?isDept=0&search=hospice+face+to+face&searchType=keyword&submitSearch=1&id=5005>
- CGS *Hospice Face-to-Face Encounters for Recertification* Quick Resource Tool: http://www.cgsmedicare.com/hhh/education/materials/pdf/Hospice%20Face-to-Face%20Encounters_H-053-01_07-2011.pdf
- *Medicare Benefit Policy Manual* (CMS Pub. 100-02, Ch. 9, section 20.1): <http://www.cms.gov/Regulations-and-Guidance/Guidance/Manuals/Downloads/bp102c09.pdf>