



STATE OF OKLAHOMA
OKLAHOMA HEALTH CARE AUTHORITY

OHCA 2016-24

August 23, 2016

RE: Effective Immediately - Face to Face Requirements for Home Health Services

Dear Provider,

Effective immediately and in accordance with federal regulation 42 CFR 440.70, the ordering physician is required to document that a face-to-face encounter occurred with the member prior to the initial ordering of home health services. The regulation is applicable to those state plan home health services that are billed by Home Health agencies and reimbursed by SoonerCare under Title XIX. The documentation from the face-to-face visit with a member must support the member's primary need for home health services. Please note that when a provider orders services based on a new condition that was not identified during the initial visit, a separate visit must occur within the 90 days prior to the start of care, or within the 30 days after the start of services. The face-to-face requirement ensures that the orders and certification for home health services are based on a physician's current knowledge of the patient's clinical condition. This process can include the use of telehealth technology.

The face-to-face encounter may be conducted by one of the following practitioners:

- The ordering physician;
- An approved nurse practitioner or clinical nurse specialist, working in collaboration with the ordering physician;
- A physician assistant, under the supervision of the ordering physician;
- For members admitted to home health immediately after an acute or post-acute stay, the attending physician.

The aforementioned non-physician practitioners conducting the face-to-face encounter must communicate the clinical findings for that encounter to the ordering physician. Those clinical findings must be documented in the member's medical record. To assure clinical correlation between the face-to-face encounter and the home health services, the ordering physician must note the practitioner who conducted the encounter and certify that the encounter occurred within the required timeframes. As mentioned above, the ordering physician must also certify that the encounter was related to the primary reason the member requires home health services.

If you have any questions regarding the information provided in this letter, please contact the OHCA Provider Services at (800) 522-0114, option 1.

Thank you for the services you provide to our SoonerCare members.

Sincerely,

A handwritten signature in cursive script that reads "Rebecca Pasternik-Ikard".

Rebecca Pasternik-Ikard
State Medicaid Director