

NPPS and Home Health Services Under the PHE

Q. NPP, can we assume that co-signatures by a physician are not required. And still not able to do Face to Face

A. A physician is not required to co-sign home health certifications and orders written by NPPs.

NPPs are permitted by statute to conduct the F2F encounter.

Q: So by permanent, does that mean this is expected to continue after the emergency has ended. And NPP will be able to order home health after this ends?

A. During the PHE, CMS is using their discretion to not enforce the prohibition on NPPs certifying patients and ordering home health services. Home health agencies (HHAs) must comply with state requirements regarding scope of practice for NPPs and home health agency licensing laws.

The CARES Act permits NPPs to certify patients and order home health services on a permanent basis, However, CMS must issue regulations in order to implement the statute and set an effective date.

Q. To clarify, NPs/PAs are ALLOWED to sign today?

A. Under this PHE, NPPs may certify patients and order home health services, effective March 1, 2020

Q: Is a Resident allowed to sign 485-487 or any other order for Home Health?

A. A resident that is enrolled in Medicare and licensed to practice medicine in the state where the services are delivered may certify patients and order home health services under the Medicare program.

Q: Are PAs included in the NPP group?

A. NPPs that are permitted to certify patients and order home health services include nurse practitioners, physician assistants, and certified nurse specialists.

Q: For certifying MD's that are off/ill are other MD's within the practice able to sign the POC for the original MD?

A. Physicians and NPPs signing orders for the certifying/ordering physician would need to be authorized by the attending. HHAs should document in the medical record that the attending physician has authorized the physician or NPP to sign his/her orders.

Medicare General Information, Eligibility, and Entitlement

Chapter 4 - Physician Certification and Recertification of Services, 30.1 - Content of the Physician's Certification

The physician must sign and date the plan of care (POC) and the certification prior to the claim being submitted for payment; rubber signature stamps are not acceptable. The plan of care may be signed by another physician who is authorized by the attending

physician to care for his/her patients in his/her absence. While the regulations specify that documents must be signed, they do not prohibit the transmission of the POC, oral order, or certification via facsimile machine. The HHA is not required to have the original signature on file. However, the HHA is responsible for obtaining original signatures if an issue surfaces that would require verification of an original signature.

Q: What about PECOS enrollment for NPPs? if they are enrolled for billing other CMS services, does that count for home health as well?

A. An NPP enrolled in Medicare is able to be certify patients and order home health services. If an NPP signs the POC he/she must be reported on the Medicare claim, the same as when a physician signs the POC. The CMS claims processing system will need to be updated to accept the NPIs of NPPs.