

FAQs - New Medicare Rules on DME Face-to-face Encounters and Written Orders Prior to Delivery

Question: When does this rule take effect?

Answer: The Medicare Durable Medical Equipment Face-to-Face Encounters and Written Orders Prior to Delivery rule goes into effect on July 1, 2013.

Question: What are the requirements of the new rule?

Answer: The new rule requires that beneficiaries must have a face-to-face encounter with a physician, physician assistant (PA), nurse practitioner (NP), or clinical nurse specialist (CNS) within 6 months prior to the written order for certain types of DME (including CPAP).

Documentation of the face-to-face encounter must reflect that the beneficiary was evaluated and/or treated for a condition justify ordering of the DME. If the face-to-face evaluation is performed by a PA, NP or CNS, the documentation must be signed or co-signed and dated by a physician.

Question: Why has Medicare instituted this new rule?

Answer: The rule is the result of language in the Affordable Care Act, which requires that for certain items of DME, the beneficiary has had a face-to-face encounter with a physician, physician assistant, nurse practitioner or clinical nurse specialist pursuant to the written order. In its rule making process, Medicare also identified that this rule is intended to prevent future fraud and abuse in the delivery of DME to Medicare beneficiaries.

Question: What information must be included in the written order?

Answer: The written order for DME must include:

- The beneficiary's name
- The item of DME ordered
- The prescribing practitioner's National Provider Identifier (NPI)
- The signature of the ordering practitioner
- The date of the order

Question: When must the face-to-face encounter take place?

Answer: The face-to-face encounter with the physician, PA, NP or CNS must occur during the six months prior to the written order.

Question: Will Medicare reimburse for the additional work performed by a physician who signs or co-signs the face-to-face encounter performed by a PA, NP or CNS?

Answer: Yes, physicians can bill a new code, G0454 to receive compensation for signing or co-signing face-to-face encounter documentation. This code should not be used when the physician provides the face-to-face encounter. It is limited to cases in which the physician is documenting an encounter performed by a PA, NP or CNS. Additionally, code G0454 can only be reported one time per beneficiary per encounter, regardless of then number of DME items documented in the face-to-face encounter.