



The Physician Assistant's New Role in Medicare Home Health

July 9, 2020

On April 29, 2020, CMS made permanent its emergency declaration allowing Physician Assistants and Nurse Practitioners to certify patient eligibility for Medicare home health and to supervise home health plans of care. This memo summarizes the implications of CMS's decision on PAs in New Hampshire.

CMS's announcement is welcome news! The Alliance has been working with national advocates for over 10 years to pass the Home Health Planning Improvement Act, which would grant this authority. Senator Susan Collins from Maine and NH's Senator Jeanne Shaheen have been longtime champions. This will enable PAs to be more involved with their patients' care in the home. It reduces the administrative burden on physicians to attest to eligibility and supervise care plans for patients they may not know. The Home Health Planning and Improvement Act language was included in Section 3708 of the CARES Act. CMS initially implemented the PA/APRN authority on an emergency basis and made it permanent in the Second Interim Final Rule.

What Do PAs Need to Know to Exercise This New Authority?

Update PECOS

- A PA must be an enrolled Medicare provider in PECOS for **both** the home health agency and PA's practice to bill for services.
- Click here for the [CMS Provider Enrollment Information website](#) and link to PECOS.
- For assistance with Part B Medicare enrollment, call National Government Services (NGS) at 888-379-3807.

Understand Medicare Requirements for Home Health Certification and Supervision

- **Certifying Patient Eligibility for Home Health**
Medicare has strict requirements regarding patient eligibility for home health. The patient must meet homebound standards; have a need for skilled services that is based on the patient's specific diagnosis and current condition; have had a face-to-face encounter with physician, PA or ARNP within 90-days before referral or 30-days after referral; and be under the care of a supervising provider (who can now be a PA.) The provider must certify this eligibility.
- **Supervising the Home Health Plan of Care**
PAs can now supervise the home health plan of care. The home health provider will complete a comprehensive patient assessment upon referral and develop recommendations for the plan. The PA must sign and date the home health plan of care, review it every 60 days, and sign any changes to the plan.

National Government Services (NGS) has an [online Medicare University](#) resource to help referring providers understand their responsibilities. *(Please note: NGS has not yet updated all their materials to reflect the new authority for PAs and APRNs, so some materials may mention only physicians as certifying/supervising providers.)*

Below are some of the recommended programs in Medicare University:

- RHH-C-0019: Home Health: Qualifying Eligibility Criteria
- RHH-C-0020: Home Health: Face-to-Face Encounters and the Plan of Care
- RHH-C-0021: Home Health: Certification and Recertification of Eligibility Criteria
- RHH-C-0022: Home Health: Homebound Status and the Need for Skilled Services

NGS also has brief job aides that are helpful:

- [Referring the Medicare Beneficiary to Home Health Services](#)
- [Home Health Plans of Care - NPs, CNSs and PAs Allowed to Certify](#)
- [Home Health Certification Statement](#)
- [Homebound-Status](#)
- [What Physicians \(PAs and APRNs\) Need to Know About the Patient Driven Groupings Model](#)

The certifying provider and supervising provider can be different people (e.g. hospitalist may certify, and community PA may supervise.) Providers are encouraged to work with their home health partners to ensure documentation is complete and accurate when patients are referred for home health. **It is essential that primary diagnoses and co-morbidities are specific, and that orders are reviewed, signed, dated, and timed as quickly as possible.**

Be Sure Your Delegation Agreement (DA) Includes Home Health

- **For Physician Assistants** Home health agencies may seek to verify that ordering home health services is within your scope of practice. If your supervising physician delegates these services to you, it should be implied or stated in your DA. You should consider updating your DA to reflect these services and be prepared to provide a copy to the home care agency.
- Large practices or institutions that employ many PAs may provide an affirmation letter, that attests to their PAs' scopes of practice, which can be provided to the home health agency.
- **For Home Health Agencies** In New Hampshire, Physician Assistants may order home health services, including certification and supervision of home health, if it is within their scope of practice as outlined by the DA between the PA and PA's Supervising Physician. In these cases, a physician co-signature is *not* required.
- Agencies should consider creating an internal policy to verify PA scopes of practice. One option would be to request a copy of the PA's DA. Another option – especially for PAs employed by large practices or institutions – is to request that the PA provide an affirmation letter from the employer attesting to DAs for employed PAs. Some agencies may be unable to assume the administrative burden associated with requesting and validating DAs and continue to request physician co-signatures. Agencies are encouraged to work with their PA partners on a streamlined process to assure access to patient care.

Questions? Contact [Linda Martino](#), PA-C with NHSPA or [Gina Balkus](#) with the Alliance.