



TO: Physicians, Advanced Practice Registered Nurses, Physician Assistants, Psychologists, Podiatrists and Home Health Agencies

RE: Physician Signature on the CMS-485, Home Health Certification and Plan of Care

It has come to the Department's attention that there is confusion regarding the physician signature on the CMS-485, Home Health Certification and Plan of Care. This form documents the physician orders for services provided by a home health agency. The mandatory role of the physician in monitoring and coordinating the patient's plan of care is spelled out in both federal regulations at 42 C.F.R. § 484.14(g) ("Coordination of patient services") and in state regulations at section 19-13-D73(b) of the Regulations of Connecticut State Agencies ("Patient care plan").

Frequently a physician signs the CMS-485 for care that is outside his or her scope of practice. Typically the patient has both medical and behavioral health diagnoses for which one provider, usually a psychiatrist, signs the form, thereby signing off on the administration of both psychotropic and non-psychotropic medications. Physicians believe they are ordering only those services in which they are involved; however, by signing the CMS-485, the physician is, in fact, ordering the entire plan of care.

The Department is also concerned that services ordered unintentionally by physicians on the CMS-485 are not being appropriately monitored for safety and medical necessity which places the patient at risk for significant harm. Physicians responsible for the management of certain health conditions may add, change or discontinue medications for their patient incorrectly as they are unaware of the services being ordered on the CMS-485.

Instructions for completion of the CMS-485 state that "The attending physician is the physician who establishes the plan of care and who certifies and recertifies the medical necessity of the visits and/or services."

In order to ensure that the physician is signing off on the services that he or she takes responsibility for ordering, the Department is adopting the following process:

- The attending physician should sign and date the home health plan of care (Box 27 on the CMS-485) if he or she is authorizing the entire plan of care.
- If the intention is to take responsibility for specific services, treatments or medications listed on the plan of care, the physician should indicate, "I am ordering and/or verifying only those services, treatments and medications which I have initialed above." when signing. The physician should initial only the services, treatments and medications for which he or she is assuming responsibility
- In the event that the attending physician authorizes only a portion of the plan of care, it is the responsibility of the home health agency to obtain signed orders for the remaining services from the appropriate physician before providing the services to the patient.

This process will ensure that all physicians involved will see the entire plan of care, including medications the patient is taking, so as to make sure that services are coordinated and there are no contraindications and/or incompatible medications being taken together. Any medication or service listed on the plan of care without a signature or initial will not have a valid physician order for a home health agency to provide the care.

