

# Hospice Certification of Terminal Illness (CTI) Checklist

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This checklist outlines all required elements, timing, and documentation for initial hospice certification of terminal illness under Medicare regulations. All criteria must be met to ensure payment eligibility and patient compliance.

### Timing and Physician Eligibility Requirements

#	Requirement	Explanation / Details	Completed
1	Timing of Certification	Certification (verbal or written) must be obtained <b>no later than 2 calendar days after hospice care starts</b> (i.e., by the end of day 3).	<input type="checkbox"/>
2	Acceptable Certifying Professionals	Only <b>medical doctors (MD)</b> or <b>doctors of osteopathy (DO)</b> may complete or sign certifications or recertifications. Nurse practitioners (NPs) and physician assistants (PAs) <b>cannot</b> certify terminal illness.	<input type="checkbox"/>
3	Attending Physician Rules	If the patient has an <b>attending physician</b> (chosen by the patient), that physician may participate in the certification only if they are an MD or DO. If the attending physician is an NP or PA, the hospice physician must certify instead.	<input type="checkbox"/>
4	Pre-Election Certification	Initial certification can be prepared <b>up to 15 days prior</b> to the election of hospice care but cannot be backdated.	<input type="checkbox"/>
5	Oral Certification Requirement	If the <b>written certification</b> is not available within 2 days of hospice start, an <b>oral certification</b> must be obtained within 2 days, with the <b>written version required before submitting a payment claim</b> .	<input type="checkbox"/>
6	Date Documentation if Missing	If the certifying physician forgets to date the form, a <b>notarized letter or valid proof of when the certification occurred</b> must be added to support claim processing.	<input type="checkbox"/>

## Certification Content Requirements

#	Requirement	Explanation / Details	Completed
7	Prognosis Statement	A <b>clear written statement</b> must declare that, in the physician's medical opinion, the patient is expected to live <b>6 months or less</b> if the disease runs its usual course.	<input type="checkbox"/>
8	Supporting Clinical Documentation	Certification must include <b>specific medical observations, lab data, diagnostic findings, and clinical judgment</b> to support the 6-month prognosis.	<input type="checkbox"/>
9	Physician Signature(s)	The certification must be <b>signed and dated</b> by the appropriate physician(s). The certification must also specify the <b>coverage period dates</b> for which it applies (e.g., 03/05/25 to 06/03/25).	<input type="checkbox"/>
10	Narrative Summary (Post-10/1/2009 Rule)	A <b>brief narrative</b> summarizing the clinical facts that justify the prognosis must be included. This narrative must: <ul style="list-style-type: none"> <li>• Be personally written or dictated by the certifying physician.</li> <li>• Reflect the unique clinical situation of the patient (no templates or checkboxes).</li> <li>• Be located <b>directly above the physician's signature</b> if within the certification form, OR</li> <li>• If provided as a <b>separate addendum</b>, it must be signed immediately <b>after the narrative itself</b>.</li> </ul>	<input type="checkbox"/>

## Face-to-Face (FTF) Encounter Requirements (Recertifications Only)

#	Requirement	Explanation / Details	Completed
11	FTF Encounter Timing	For recertifications beginning with the third benefit period, a <b>face-to-face visit</b> must be conducted by a <b>hospice physician or nurse practitioner</b> . This visit must take place <b>before</b>	<input type="checkbox"/>

		the start of the third benefit period and each benefit period thereafter.	
12	FTF Documentation	The physician or NP must document how the FTF findings support continued hospice eligibility (i.e., continued prognosis of six months or less). This explanation is <b>required within the CTI</b> .	<input type="checkbox"/>
13	Consequence of FTF Non-Compliance	Failure to perform or document the FTF encounter prior to the third (or later) benefit period means the hospice <b>cannot recertify the patient</b> , and the individual becomes <b>ineligible for continued hospice care</b> under Medicare.	<input type="checkbox"/>

### Optional Note on Payment and Certification Basis

- Medicare payment starts **on the date the patient is admitted** to hospice, assuming all certification requirements are met.
- The certifying physician's determination must be based on a **clinical judgment** supported by available patient information and disease trajectory.