Hospice Special Focus Program: Components and Implications

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Legal Disclaimer

This presentation does not constitute legal advice and is not intended to take the place of legal advice. This presentation has been developed by NHPCO for informational purposes only. It is always the provider's responsibility to determine and comply with applicable regulatory requirements.

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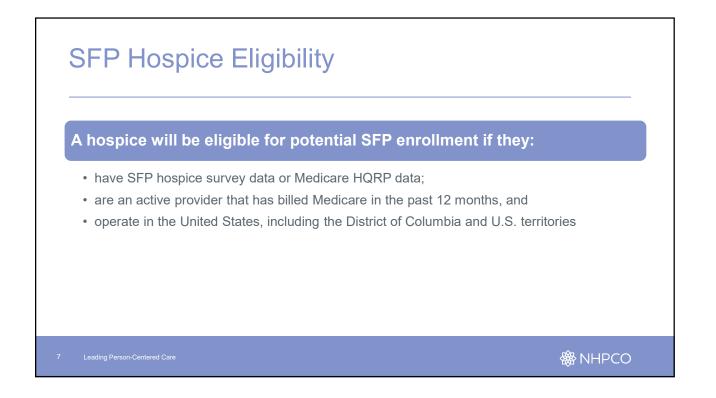
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Overview		
 Background Methodology Enforcement Timing and Implementation 		
Potential Impacts		
Lessons LearnedHospice Impacts		
Advocacy Efforts		





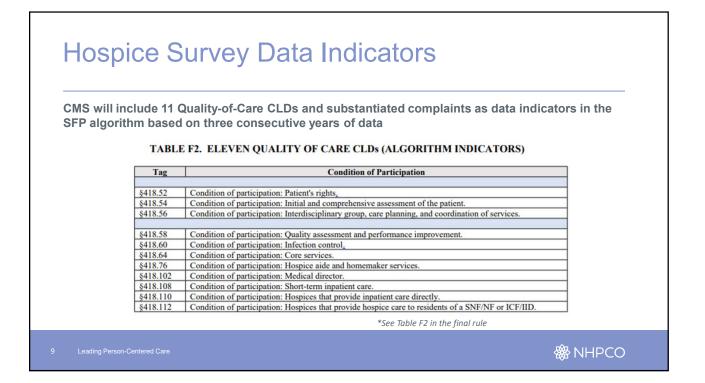
/IS finalizes th	ne following SFP indicators	s to determine a selection	n into the SFP:
Data Source	Hospice Surveys	Hospice Quality	Reporting Program (HQRP)
		Claims Data	CAHPS [®] Hospice Survey Measures
Indicators	Quality-of-Care Condition- Level Deficiencies		Help for Pain and Symptoms
		Hospice Care Index (HCI)	Getting Timely Help
	Substantiated Complaints		Willingness to Recommend this Hospice
	Substantiated Complaints		Overall Rating of this Hospice
			*See Table F1 in the final rule

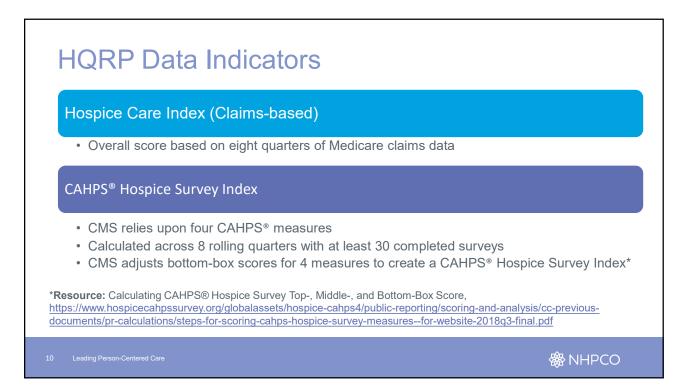


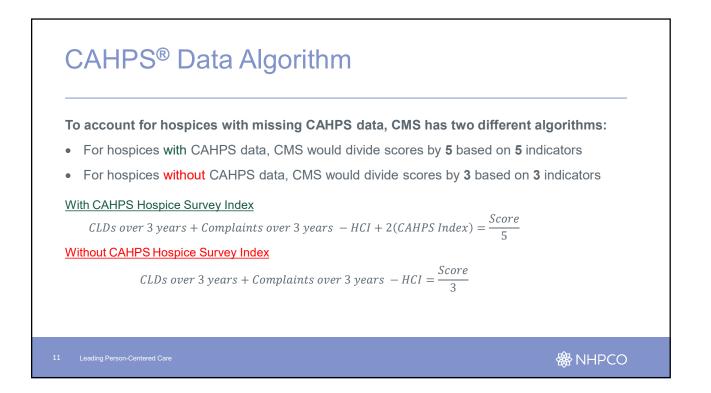
Special Focus Program Hospice Identification

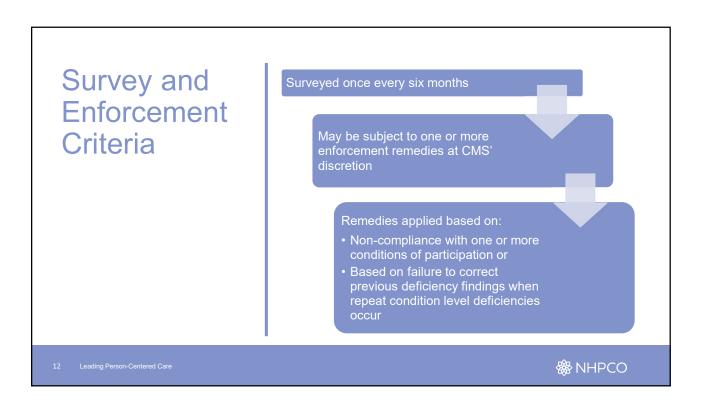
CMS will select the first cohort of SFP participants in November 2024 based on the following data:

Data Indicator	Source	Date Ranges	Exclusion Criteria
Hospice Care Index (HCI)	Hospice Provider Data Catalog File: Hospice – Provider Data Updated: Annually (November)	November 2024 Refresh Jan. 1, 2022- Dec. 31, 2023	 Less than 8 quarters of data Less than 20 claims over 8 quarters of data
CAHPS Hospice Survey Bottom-Box Scores	Hospice Provider Data Catalog File: Hospice – Provider CAHP Hospice Survey Data Updated: Quarterly		 Fewer than 50 survey eligible patient/caregiver pairs in a year Fewer than 30 completed surveys during reporting period New hospices (receive CCN after 1/1 of collection year)
Survey Data (CLDs and substantiated complaints)	QCOR	2021-2024 May 1, 2021 – April 30, 2024	• None
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SFP Graduation and Medicare Termination

SFP Graduation

- 1. No CLD or immediate jeopardy (IJ) citations for any two six-month SFP surveys, and
- 2. No pending complaint survey triaged at an IJ or condition-level, or
- 3. Has returned to substantial compliance with all requirements.

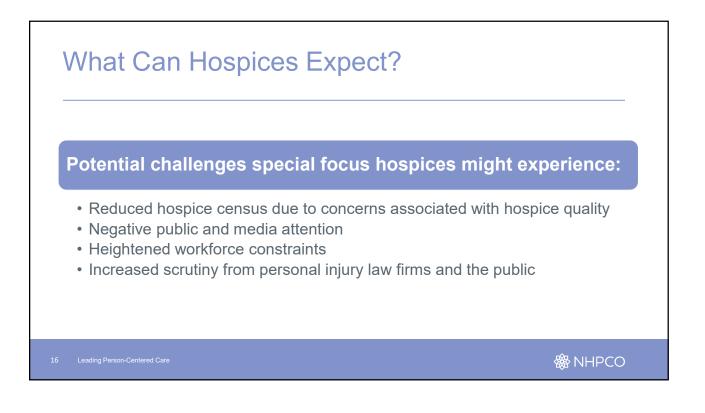
SFP Hospice Would be Considered for Medicare Termination if:

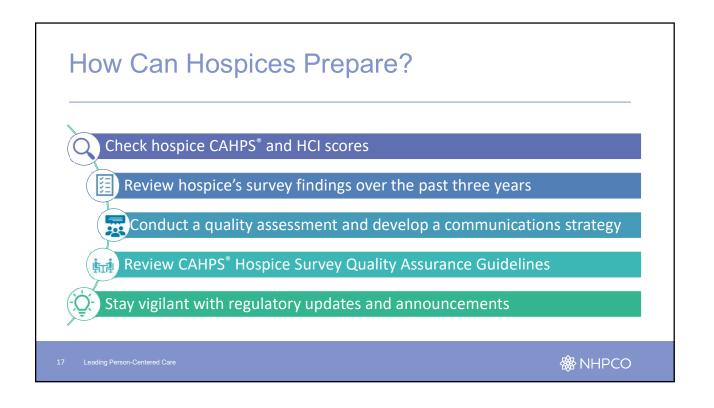
- The hospice fails any two SFP surveys with CLDs on the surveys in 18-month period,
- · The hospice has pending complaint investigations triaged at IJ or condition-level, or
- The hospice is not able to achieve substantial compliance.

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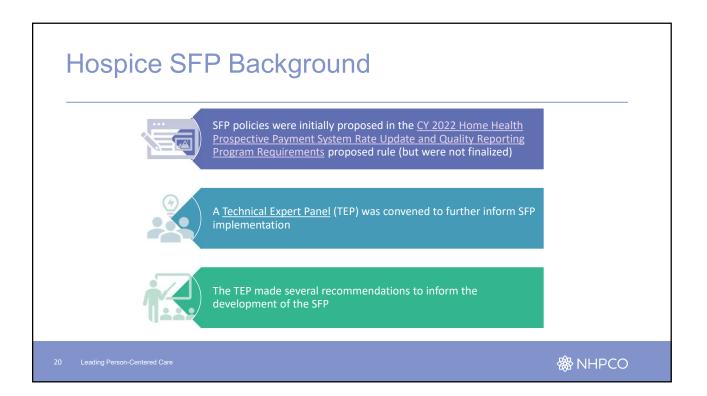




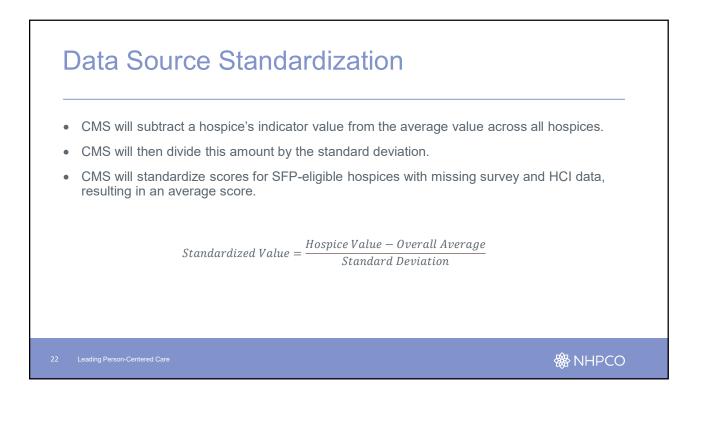








Issue	TEP Recommendation	2024 Home Health Rule
Scaling	TEP adopted a scaling methodology for Quality- of-Care CLDs and substantiated complaints per 100 beneficiaries (excepting small hospices).	CMS does not adopt a scaling methodology for CLDs and substantiated complaints.
Weighting	TEP recommended a lower weight (0.25) for CAHPS® scores.	CMS doubles the weight (2.0) of the CAHPS® Index in the SFP algorithm, and excludes hospices without a CAHPS® score.
Technical Assistance	TEP unanimously agreed that technical assistance should be provided by a third party to SFP hospices.	CMS will not provide technical assistance to SFP hospices, nor will CMS arrange to have this assistance provided by a third party.
Public Reporting	TEP generally agreed that SFP hospices should be clearly identified on the CMS Care Compare website with an icon.	CMS will publish a list of both SFP hospices <u>and</u> a list containing the bottom ten percent poor performing hospices identified under the final SFP algorithm.
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Measure	Measure Weight	Bottom-Box Score
Overall Rating of this Hospice	0.5	100
Willingness to Recommend this Hospice	0.5	12
Help for Pain and Symptoms	1.0	0
Getting Timely Help	1.0	4.5
	Final Score:†	60.5
	†Fori	nula = ((100 + 12) x 0.5) + (0 + 4.5) = 60.5

Absolute Value	Standardized Value
0	0
2	0.6
9 (compared to average value of 8.9)	0.1
44.5 (compared to average value of 28)	2.4
Subscore:†	5.3
Final Score (Subscore/5) =	1.06
all other hospices' scores =	<u>331</u>
7	Formula = 0 + 0.6 - 0.1 + (2 x 2
	0 2 9 (compared to average value of 8.9) 44.5 (compared to average value of 28) Subscore:† Final Score (Subscore/5) =

Case Examples, Contir	nued	
Hospice B (120 census, <u>without</u> CAHPS sc	ore):	
Indicator	Absolute Value	Standardized Value
Total CLDs over 3 years	15	9.2
Total Substantiated Complaints over 3 years	42	16.4
HCI	10 (compared to average value of 8.9)	0.9
CAHPS Survey Index Measure	N/A	N/A
	Subscore:†	24.7
	Final Score (Subscore/3) =	8.2
Final rank after comparing scor	e to all other hospices' scores =	<u>1</u>
		†Formula = 9.2 + 16.4 - 0.9 = 24.7
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