

Eli's Hospice Insider

COMPLIANCE: Revised F309 Guidance Spells Out What Nursing Homes and Hospices Should Do for Hospice Residents

Nursing home surveyors now have a specific tag for noncompliance.

Hospices aren't the only ones seeing ramped up survey scrutiny for hospice care. The revised F309 survey guidance (quality of care) for nursing homes, effective March 31, includes several bullets listing what nursing home surveyors should expect the nursing home and hospice to do for residents on the hospice benefit.

"The hospice guidance was [previously] in Appendix P of the surveyor process, which would have told surveyors what to look at, but now there's a specific tag, F309, if the facility isn't in compliance," says attorney **Paula Sanders**, partner, Post & Schell in Harrisburg, Pa.

Check Out the Requirements

The revised F309 guidance directs nursing home surveyors to review the following for residents receiving hospice benefit care:

- "The plan of care reflects the participation of the hospice, the facility, and the resident or representative to the extent possible;
- The plan of care includes directives for managing pain and other uncomfortable symptoms and is revised and updated as necessary to reflect the resident's current status;
- Medications and medical supplies are provided by the hospice as needed for the palliation and management of the terminal illness and related conditions;
- The hospice and the facility communicate with each other when any changes are indicated to the plan of care;
- The hospice and the facility are aware of the other's responsibilities in implementing the plan of care;
- The facility's services are consistent with the plan of care developed in coordination with the hospice, (the hospice patient residing in a SNF/NF should not experience any lack of SNF/NF services or personal care because of his/her status as a hospice patient); and
- The SNF/NF offers the same services to its residents who have elected the hospice benefit as it furnishes to its residents who have not elected the hospice benefit. The resident has the right to refuse services in conjunction with the provisions of 42 CFR 483.10(b)(4), F155."