

## Eli's Hospice Insider

### COORDINATION OF CARE: CMS to Nursing Home Surveyors: Report Unresolved Hospice Concerns to Hospice Surveyors

Revised survey guidance for nursing homes includes this directive and more.

The Centers for Medicare & Medicaid Services seems to be laying the groundwork to not only ensure communication and coordination between nursing homes and hospices, but also the surveyors who inspect these providers.

In revised nursing home survey guidance for F309 (quality of care), effective on March 31, CMS directs surveyors to report a nursing home's unresolved complaints about hospice care coordination of care or services to the state agency responsible for hospice oversight. Surveyors should identify the "specific resident(s) involved" and the identified concerns, directs the guidance.

"Hospices should be documenting any concerns that the nursing home staff have expressed and also what the hospice staff has done to address those concerns," says Judi Lund Person, MPH, VP of NHPCO.

Quid pro quo: "Hospice surveyors are being told to look for problems with nursing homes and report them as well," observes attorney **Paula Sanders**, partner with Post & Schell in Harrisburg, Pa.

Preempt, Document Nursing Homes' Concerns

"Hospices should be documenting any concerns that the nursing home staff have expressed and also what the hospice staff has done to address those concerns," advises **Judi Lund Person, MPH**, VP of regulatory and state leadership for the National Hospice & Palliative Care Organization. As for top nursing home concerns, communication probably ranks as the biggest one along with "who is in charge of what," says Person. The new hospice CoPs, in fact, try to spell that out more specifically, she notes.

In a nutshell: "The nursing home is responsible for room and board and services not related to the patient's terminal illness, and the hospice is responsible for services related to the terminal illness," Person adds.

The new hospice COPs also require the hospice to have a point person for communication with the nursing home, Person reminds. "That person is usually the nurse who does the care coordination and also acts as the main conduit for communication," she adds.

Real-world example: Seasons Hospice and Palliative Care appoints a nurse case manager for the patient, who is responsible for the care of the patient within the facility, reports **Tim Simpson, RN, CHPN**, VP of clinical services for the hospice in Des Plaines, Ill. The nurse case manager, who serves as the "point person" to the nursing home, meets with the nursing home's director of nursing and the staff nurse during each visit, and discusses the needs of the patient and family.

"We also use electronic medical records, which allows us to customize the special needs of the patient, family, and nursing facility and keep this information updated," adds Simpson. The point person "is identified and documented in the electronic medical record," as well, he adds.

Another communication booster: "Every patient also has a sticker that informs the facility to notify the hospice of any changes that occur with the patient or their orders any time day or night," adds Simpson. "Our nurse case manager also reviews the patient's chart every visit to look for any changes that may have occurred regarding the patient or their care plan."

