

Eli's Hospice Insider

HIS: Tackle HIS Preparation With These 6 Steps

Make room for new HIS training sessions on your calendar.

Even though it's still winter, the time has come to prepare for summer ☐ at least for the new Hospice Item Set data collection and reporting requirement that hits July 1.

Reminder: In the 2014 hospice payment final rule published in the Aug. 7, 2013 Federal Register, the **Centers for Medicare & Medicaid Services** finalized the new Hospice Item Set data collection tool for hospice patients. Hospices must complete HIS at admission and discharge for all patients. The data hospices report will go into calculations for seven new hospice quality measures (see box, below).

Hospice industry veterans have likened the new data collection tool to OASIS for home health agencies, and they have wondered if it will lead to a case mix payment system like OASIS did.

However, HIS and OASIS are different in one important way, noted **Franziska Rokoske**, with CMS HIS contractor **RTI**, in a Jan. 22 Open Door Forum for home health and hospice providers. HIS is not a patient assessment instrument and won't be administered to the patient, family, or caregivers, Rokoske emphasized. "Hospices will complete the Hospice Item Set based on review of information contained in the patient's clinical hospice record," she told forum attendees.

HIS will be similar to OASIS in how hospices submit the data, however, she noted (see related story, p. 19).

Hospices that fail to report HIS data starting in July will suffer a 2 percent payment reduction in 2016, CMS warned in the final rule. Consider these recommendations from CMS and its contractors to get ready for the new requirement:

1. Familiarize yourself with the HIS items you'll collect, Rokoske recommended. Hospices will need to collect data for 27 questions at admission and 13 questions at discharge/death. See the items at www.cms.gov/Regulations-and-Guidance/Legislation/PaperworkReductionActof1995/PRA-Listing.html ☐ search for "CMS-10390" in the "Filter On" box and click on the April 29 entry. Or for a free copy of the admission and discharge forms and direct link to the package, e-mail editor Rebecca Johnson at rebeccaj@eliresearch.com with "HIS forms" in the subject line.

HIS still hasn't received approval from the **Office of Management and Budget**, CMS points out. But "significant revisions are not expected," notes the **National Association for Home Care & Hospice** on its website.

2. Read the manual. CMS has just issued the 109-page HIS Manual: Guidance Manual for Completion of the Hospice Item Set (HIS). The Manual will provide clear instructions on many areas of HIS collection, Rokoske said. Like the OASIS Manual, it contains item-specific guidance.

For example: Teri Harrington from Hospice Community Inc. in Modesto, Calif., asked a question about the timing of admission data collection for NQF #1617 (Patients Treated with an Opioid who are Given a Bowel Regimen). "The Manual will give you clear guidance," Rokoske responded.

"Pay special attention to the definitions and timeframes required for each of the measures," NAHC urges.

3. Shore up collection of clinical information. Because HIS is not an in-person assessment, hospice staff will need to match the HIS items to documentation in the record. Thus, you must ensure "that your hospice routinely collects the patient information that will be needed to complete a HIS admission and the HIS discharge records," Rokoske advised.

Not only must the info be in the record, it should be "easily retrievable," NAHC adds.

"Who in a hospice is going to abstract all this data from clinical records?" wonders **Weatherbee Resources' Heather Wilson** after watching CMS's newly posted training sessions on HIS. "Will hospices need to hire more people to do this?" she asks on Weatherbee's blog.

Wilson expects hospices to have to work "to make sure their assessment/clinical tools are adequately capturing the data needed for the HIS," she notes.

4. Know who and when. Hospices must complete a HIS for every patient, regardless of payer source, age, site of service, transfer status, or previous revocation/discharge, Rokoske explained to forum attendees.

Clarification: That means when a patient transfers from another hospice to your agency, you need to complete a HIS-Admission just as you would for any patient newly admitted to your program, CMS's **Robin Dowell** explained in response to one hospice's query in the question-and-answer portion of the call.

Hospices may be confused, because CMS will use data only from patients 18 years and older to calculate hospices' quality measure scores. But hospices will need to collect and report data for their under-18 patients, even if CMS won't currently use the data for quality reporting purposes, she noted.

5. Avoid unnecessary data collection and reporting. The implementation date for HIS is July 1. However, the data collection tool will apply only to patients who have both a HIS-Admission and a HIS-Discharge, Dowell clarified. So, patients you admit before July 1 will not need a discharge HIS, even if their episodes end after July 1.

6. Schedule training now. CMS held live training on HIS data collection at its headquarters in Baltimore Feb. 4 and Feb. 5 and has made the sessions available on Youtube at [www.youtube.com /user/CMSHHSgov](http://www.youtube.com/user/CMSHHSgov).

Do this: "Have one or more people review the February trainings and get a good handle on the scope of what is required by the Hospice Item Set," Wilson advises. Expect to add staff training and IT work to your schedule in the coming months, thanks to HIS.

Plan ahead: In May, CMS will make available WebEx training modules on data submission. "Making time and preparing and attending and watching those training modules are going to be vital," urged **Kathy Langenberg** in the forum. "It will save you frustration down the line as long as you're prepared."

Note: More information, including a link to the Manual, training slides from the training sessions, and more, is online at www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/Hospice-Quality-Reporting/Hospice-Item-Set-HIS.html.