

## Eli's Hospice Insider

### Hospice Item Set: Hospice To Get Its Own Assessment Tool, Over Protests

#### How heavy will the assessment burden be?

Get ready to add one more item to your workload, although the implementation date may be a ways off.

The **Centers for Medicare & Medicaid Services** "is considering developing a new data collection mechanism for use by hospices," it confirms in its 2017 hospice payment update final rule published in the Aug. 5 Federal Register. "This new data collection mechanism would be a hospice patient assessment instrument, which would serve 2 primary objectives concordant with the Affordable Care Act legislation: (1) to provide the quality data necessary for HQRP requirements and the current function of the HIS; and (2) provide additional clinical data that could inform future payment refinements."

CMS also holds onto the idea it stated in its proposed rule back in April, to possibly use the assessment tool to influence payment. "CMS envisions the hospice patient assessment tool itself as an expanded HIS," the agency says in the rule. "The hospice patient assessment tool would include current HIS items, as well as additional clinical items that could be used for payment refinement purposes or to develop new quality measures."

CMS is still in the "early stages" of the tool's development, it assures in the rule. But it claims that the "vast majority" of comments it received on the general idea of the tool were positive, according to the final rule. It specifically cites the support of the **Medicare Payment Advisory Commission** for the new document.

Commenters offered a wealth of suggestions for such a tool, often urging CMS to keep in mind the unique and specific nature of hospice services. Particularly, that the assessment go beyond the clinical nuts and bolts common in other settings, according to the rule.

CMS takes pains to put some of commenters' fears to rest. "We would like to assure the provider community that we wholeheartedly agree with commenters regarding the unique nature of hospice care, and we intended to keep the hospice philosophy as the foundation of the patient assessment tool," the agency says. "We seek to develop an assessment tool that reflects the distinctive aspects of hospice care, including the palliative, rather than curative, focus of hospice care."

CMS adds later in the rule, "it is not our intent to develop an assessment tool that inappropriately relies on items from existing tools, such as the Minimum Data Set (MDS) and Outcome and Information Assessment Information Set (OASIS)."

#### Assessment Tool Timeline Undefined

CMS also emphasizes that "it is our intent to use a development process [for the tool] that is transparent and includes multiple opportunities for stakeholder input."

**Skeptical:** CMS's response to concerns about costs and workload is leaving some providers wary. The agency insists that "we believe that regular, ongoing input from the provider community will aide in the development of an assessment that is not overly burdensome." CMS cites technology and electronic records as ways to lighten the load.

CMS doesn't state any sort of timeline for the project. But it does note that it "will continue to inform our stakeholders on any progress and proposals regarding the patient assessment tool through future rulemaking cycles."

