

## Eli's Hospice Insider

### Proposals: Prepare To Add Yet Another Form To Patients' Paperwork Mountain

**Make sure patients know QIOs are looking out for their quality concerns.**

If your patients don't know who to contact if they aren't satisfied with their quality of care, you could be in trouble if a new proposal passes.

The **Centers for Medicare & Medicaid Services** has issued a proposal that "would require most Medicare participating providers and suppliers to give Medicare beneficiaries written notice about their right to contact a **Medicare Quality Improvement Organization (QIO)** with concerns about the quality of care they receive under the Medicare program," the agency says in a release.

Currently, only hospital inpatients are given this type of information about contacting a QIO. But if the new proposal is finalized, a long list of provider types, including home health agencies and hospices, would have to inform beneficiaries about how to complain to a QIO.

"By requiring providers and suppliers to furnish QIO contact information to all beneficiaries, we are protecting beneficiaries' rights to bring their worries about quality of care to a third party for review," CMS Administrator **Donald Berwick** says in the release. QIOs investigate complaints, gather facts from all parties involved, and recommend action to help providers and suppliers improve quality of care.

CMS is also proposing a special requirement for hospices only. In addition to the QIO notices, hospices must amend the hospice patient's rights to include a requirement that "the hospice provide patients with the mailing address, electronic mail address, and telephone number of the state survey agency in the event they wish to report a grievance," notes the **National Association for Home Care & Hospice**.

Problem: Not only do these proposals create twice the work for hospice providers, they will also create a heavier burden for paperwork-heavy hospice patients who are already bogged down in notices.

CMS is accepting comments on the proposed rule through April 3. The rule is in the Feb. 2 Federal Register at <http://edocket.access.gpo.gov/2011/pdf/2011-2275.pdf>.