

Eli's Hospice Insider

Quality: CMS Floats Next Set Of Quality Measures For Reporting

Plus: Expect to start filling out a standardized data set tool for patients as soon as 2014.

Expect to see lower payment rates in 2014 if you don't collect hospice quality data starting in October.

The **Centers for Medicare & Medicaid Services** includes hospice quality data reporting requirements in its home health prospective payment system proposed rule for 2013. As previously announced, CMS will require two measures for reporting starting in October -- the structural measure on whether a hospice has a Quality Assessment and Performance Improvement (QAPI) program that includes at least three quality indicators related to patient care; and **National Quality Forum**-endorsed measure #209 on pain management.

In its voluntary hospice quality data reporting period in 2011, CMS collected the QAPI measure. However, hospices also submitted free text entries on what quality indicators they collected. This time around, hospices will just say whether they have a qualifying QAPI program and check off indicator topics, says the rule published in the July 13 Federal Register. Starting in the 2013 reporting year, they won't have to submit any indicator information at all.

Simplifying the QAPI measure reporting was one suggestion from contractor **RTI** in a recent report on the program (see Eli's Hospice Insider, Vol. 5, No. 7).

"Hospices will be evaluated based on whether or not they respond, not the results of their performance," points out accounting and consulting firm **Frost, Ruttenberg & Rothblatt** on its website.

Timeline: For its first year, CMS will require data collection for the fourth quarter of 2012 to be submitted by Jan. 31, 2013, which will affect payment rates for 2014. After that, data from calendar year 2013 will be due to CMS on April 1, 2014 and will affect payment rates for 2015, CMS proposes in the rule.

CMS will require data submission via a web-based form. Stay tuned for forthcoming training on the topic.

Take A Look At These Quality Measures

Starting in 2015, CMS is considering collecting data on these additional hospice quality measures endorsed by NQF, it says in the rule:

- 1617 Patients Treated with an opioid who are given a bowel regimen
- 1634 Pain Screening
- 1637 Pain Assessment
- 1638 Dyspnea Treatment
- 1639 Dyspnea Screening
- 0208 Family Evaluation of Hospice Care

"We welcome comments on the potential future implementation of these measures and the associated projected timeframe for implementation," CMS says in the rule.

And how does CMS plan to get good quality data on these items? "We have been working on the initial development and testing of a hospice patient-level data item set," the agency reports in the rule. "This patient-level item set could be used by all hospices at some point in the future to collect and submit standardized data items about each patient admitted to hospice. These data could be used for calculating quality measures."

CMS and RTI are currently pilot testing the initial item set with nine hospices around the country, the agency reveals on

its hospice quality data website. The pilot is scheduled to run from June 2012 to September 2012.

"We are considering a target date for implementation of a standardized hospice data item set as early as CY 2014, dependent on development and infrastructure logistics," CMS says in the rule.

Watch out: This is how OASIS in the home health industry got its start, experts point out -- as a quality data tool. Later, CMS used the data set for payment purposes.

To support measure #0208, hospices would have to conduct the FEHC survey. "We do not envision implementation of both a data set and an experience of care survey in the same year and would project implementation in succession in order to avoid excessive burden to hospices," CMS says.

Until CMS implements a standardized data set for hospices, it won't publicly report hospice quality data, the agency pledges.

Note: CMS will take comments on the rule until Sept. 4. The rule, including instructions for submitting comments online or via paper, is at www.gpoaccess.gov/fr in the July 13 issue.