

## Eli's Hospice Insider

### Quality: Get Up To Speed On Your Newest Quality Measure On Visits In Last Days Of Life

#### Where is HIS 3.0?

With the new year came new quality program requirements - and new questions about them.

Ahead of a new hospice quality measure that took effect Jan. 1, Medicare officials fielded multiple queries about it in the Dec. 16 Open Door Forum for home health and hospice providers.

Hospices and their representatives also asked the Centers for Medicare & Medicaid Services about Hospice Item Set version 3.0, which was supposed to take effect Jan. 1 but still hasn't received Office of Management and Budget approval as of press time. Likewise, CMS issued the HIS Manual V3.0 in October, but it's still in draft form.

In the forum, CMS said it still expected to receive OMB approval of the new HIS tool before Jan. 1, and would keep the industry informed. However, Jan. 1 passed with no approval and no updates.



Hospices can still submit their current HIS data, CMS assured in the forum. On its end, CMS will just remove the Section O data from the files hospices send, the CMS source explained.

In the forum, hospices asked many questions about the new claims-based quality measure, Hospice Visits in the Last Days of Life (HVLDL). It measures "the proportion of hospice patients who have received visits from a Registered Nurse or Medical Social Worker (non-telephonically) on at least two out of the final three days of the patient's life," CMS notes on its Measures Inventory Tool webpage.

"Providers are confused about the implementation of the changes to the HIS and the HVLDL measure," says **Katie Wehri** with the National Association for Home Care & Hospice. "The confusion is understandable as CMS hasn't distributed much information on this, and did not mention it in the Open Door Forum," Wehri tells AAPC. "It was only brought up under the Q&A session."

The HVLDL gray areas CMS addressed in the forum include:

**Question:** Will the measure include non-Medicare patients?

**Answer:** No. CMS can only collect data from Medicare claims, the CMS staffer explained. However, Medicare claims account for about 94 percent of hospice claims, she added.

**Question:** What date will the new measure take effect?

**Answer:** CMS will base the measure on patients who die Jan. 1, 2021, or later.

**Question:** Is the day the patient dies day 1 or day 0 for counting purposes?

**Answer:** Day 0, the CMS source said in the forum.

**Question:** Does any combination of visits between the MSW and RN work?

**Answer:** Yes.

**Question:** If the MSW and the RN each visit on the same day, does that count as visits on "at least two out of the final three days" as the measure requires?

**Answer:** It may. Stay tuned for more guidance on that issue, the CMS staffer said.

CMS also will offer training on the measure in January, according to the official.

Note: More information on the HVLDL measure is in the Paperwork Reduction Act clearance package for Hospice Item Set V3.00.0 at [www.cms.gov/regulations-and-guidance/legislation/paperworkreductionactof1995pra-listing/cms-10390](http://www.cms.gov/regulations-and-guidance/legislation/paperworkreductionactof1995pra-listing/cms-10390), the draft HIS v3.0 manual at [www.cms.gov/files/document/draftthismanualv30-10-02-2020508c.pdf](http://www.cms.gov/files/document/draftthismanualv30-10-02-2020508c.pdf), and the measure's CMS Measures Inventory Tool webpage at [https://cmit.cms.gov/CMIT\\_public/ViewMeasure?MeasureId=6111](https://cmit.cms.gov/CMIT_public/ViewMeasure?MeasureId=6111). The presentation from the HCI webinar is at [www.cms.gov/files/document/hqrp-forum-august-2020-slides.pdf](http://www.cms.gov/files/document/hqrp-forum-august-2020-slides.pdf).