

Eli's Hospice Insider

Regulations: Hospices Get Final Answer On Counting For Visits In Last Days Of Life Measure

The bad news is visits must occur on separate days to count.

If you've been working on the assumption that separate visits provided on the same day will count toward your newest quality measure, it's time to change direction.

Reminder: The Centers for Medicare & Medicaid Services is replacing the Hospice Item Set-based Hospice Visits When Death is Imminent (HVWDII) quality measure with the claims-based Hospice Visits In Last Days of Life measure. But crucial details about the new HVLDL measure have remained fuzzy, leading to confused providers asking lots of questions in the last couple of Open Door Forums for hospices.

One of hospices' top questions has been about how visits will be counted for the measure that tracks visits by an RN or Medical Social Worker (MSW) in at least two of the last three days of life. Hospices were hopeful that CMS would allow two visits in the same day to fulfill the measure.



But those hopes are now dashed, according to a recently issued "Common Questions" document on the new measure and other Hospice Quality Reporting Program topics. "HVLDL indicates the hospice provider's proportion of 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 says in the document. "While all patient visits are meaningful, only patients with visits on two different days during the last three days of life will count towards the numerator for this measure. These visits can be made by either the nurse, the social worker, or both."

Then: CMS gives a less clear answer as to when the HVLDL measure will actually replace the HVWDII one. In a December Open Door Forum, CMS said the HVLDL measure would apply to patients who died Jan. 1, 2021 or later (see HOP, Vol. 14 No. 1).

Now: "The date for public reporting of this measure will be finalized once the OMB approves the draft HIS Manual V3.00 and HIS V3.00 instrument," the document notes. "As required by statute, CMS will publicly report all HVWDII data and begin publicly reporting HVLDL thereafter. The data reported for these measures will not overlap and will be discussed in future rulemaking."

At press time, CMS had not yet issued a public reporting date although HIS V3.00 was officially finalized (see story, p. 3).

CMS also reiterates how hospices should count the days for this measure. "The calculation of the last three days remains unchanged from the last three days documented in Section O" of the HIS tool, the agency says. "These three days are 'indicated by the day of death, the day prior to death, and two days prior to death.'"

Specifically: "The day of death is the same as the date provided in A0270, Discharge Date (or the day of death)," CMS says in the document. "One day prior to death is calculated as A0270 minus 1. Two days prior to death is calculated as A0270 minus 2."

HOPE Is On The Horizon

CMS also addresses questions on these topics in the Common Questions document:

HIS V3.00. HIS V3.00, which has now been finalized, eliminates "Section O in its entirety from the HIS-Discharge," CMS explains. "Hospice providers are no longer required to collect this information at discharge."

HCI. "The Hospice Care Index (HCI) is a claims-based-measure concept based on multiple indicators," CMS recounts. "The HCI, like any other new measure would complement the current hospice quality measures (QM's) that are already in place. HCI would not replace any existing measures or any of the HQRP requirements." Timeline: "Like any new measure, the HCI must go through future rulemaking and be finalized before it can become a part of the HQRP," CMS notes.

HOPE. The forthcoming Hospice Outcomes and Patient Evaluation (HOPE) assessment tool is going to swallow up the HIS tool, CMS reminds hospices in the document.

Timeline: The HOPE tool is currently undergoing provider testing. "HOPE, after rulemaking, will become the assessment tool for the hospice industry," the agency says.

Note: The four-page Common Questions document is at www.cms.gov/files/document/common-questions-hqrp-claims-based-measuresfeb2021.pdf.