

## Long-Term Care Survey Alert

### Tool: Revised F309 Guidance Spells Out What Surveyors Will Target for Residents on Hospice

Use this as a handy QA checklist.

Talk about a roadmap to F tags: The revised survey guidance for F309 provides a checklist of what the Centers for Medicare & Medicaid Services expects nursing homes and hospices to be doing for Medicare beneficiaries on the hospice benefit.

Previously, "the hospice guidance was in Appendix P of the surveyor process, which would have told surveyors what to look at," says attorney **Paula Sanders**. But now surveyors have a specific tag, F309, to cite if the facility isn't in compliance, cautions Sanders, partner, Post & Schell in Harrisburg, Pa.

So expect surveyors to be on the lookout for the following for residents receiving the hospice benefit:

- "The plan of care reflects the participation of the hospice, the facility, and the resident or representative to the extent possible;
- The plan of care includes directives for managing pain and other uncomfortable symptoms and is revised and updated as necessary to reflect the resident's current status;
- Medications and medical supplies are provided by the hospice as needed for the palliation and management of the terminal illness and related conditions;
- The hospice and the facility communicate with each other when any changes are indicated to the plan of care;
- The hospice and the facility are aware of the other's responsibilities in implementing the plan of care;
- The facility's services are consistent with the plan of care developed in coordination with the hospice (the hospice patient residing in a SNF/NF should not experience any lack of SNF/NF services or personal care because of his/her status as a hospice patient); and
- The SNF/NF offers the same services to its residents who have elected the hospice benefit as it furnishes to its residents who have not elected the hospice benefit. The resident has the right to refuse services in conjunction with the provisions of 42 CFR 483.10(b)(4), F155."