

## Health Information Compliance Alert

### QAPI: Expect To Report These Quality Measures Soon

**Comfortable dying, care preferences and feedback from the bereaved family could be future quality measures.**

The National Quality Forum's recently endorsed list of palliative and end-of-life care measures might give you an idea of what hospice quality measures you'll be reporting down the road.

The Centers for Medicare & Medicaid Services is considering the NQF-endorsed list for possible inclusion in its quality reporting system, CMS's **Mary Pratt** said during the National Association for Home Care & Hospice's annual March on Washington conference. The NQF list includes one measure CMS has already decided to collect -- 0209: Comfortable dying (maintenance). The other endorsed measures include:

- 1634: Hospice and Palliative Care -- Pain Screening (paired with measure 1637)
- 1637: Hospice and Palliative Care -- Pain Assessment (paired with measure 1634)
- 1617: Patients treated with an opioid who are given a bowel regimen
- 1628: Patients with advanced cancer assessed for pain at outpatient visits
- 1638: Hospice and Palliative Care -- Dyspnea Treatment (paired with measure 1639)
- 1639: Hospice and Palliative Care -- Dyspnea Screening (paired with measure 1638)
- 1626: Patients admitted to the ICU who have care preferences documented
- 1641: Hospice and Palliative Care --Treatment Preferences
- 1647: Percentage of hospice patients with documentation in the clinical record of a discussion of spiritual/religious concerns or documentation that the patient/caregiver did not want to discuss
- 1625: Hospitalized patients who die an expected death with an ICD that has been deactivated
- 0208: Family Evaluation of Hospice Care (maintenance)
- 1632: CARE -- Consumer Assessments and Reports of End of Life
- 1623: Bereaved Family Survey

More information on the measures is on the NQF website at [www.qualityforum.org/Measures\\_List.aspx](http://www.qualityforum.org/Measures_List.aspx). To search for a measure, put its number in the search box in the upper left-hand corner of the screen.

In CMS's recent voluntary reporting period for hospice quality data, 924 hospices submitted 6,712 QAPI indicators, CMS's **Mary Pratt** said in the session. The data reporting period of the fourth quarter of 2011 closed Jan. 31. CMS "was quite pleased and encouraged" by that volume of voluntary data submission, Pratt told attendees. CMS is now analyzing the "treasure trove of information" submitted during the process, she said.

Reminder: In addition to the structural QAPI measure collected during the voluntary period, the upcoming mandatory collection will include the quality measure on pain known as NQF #209 or comfortable dying. The required data collection will be for the fourth quarter of 2012. Submission of the structural measure data will be due by Jan. 31, 2013 and submission of the pain measure data will be due by April 1, 2013. If hospices fail to submit the required data, their payment rates will be reduced by 2 percent starting in FY 2014.

CMS isn't going to stop at requiring two measures for hospice quality reporting. For an idea of what new measures CMS will consider in the future, look at the National Quality Forum's recent list of endorsed measures, Pratt suggested. "We are looking at using these potentially for future reporting years," she said. However, not all of the measures will apply to hospices. Some are appropriate for other settings such as hospitals or other pre-hospice locations.

Surveys: Hospices may not have a survey frequency requirement under Medicare rules, but they still continue to rack up deficiencies, noted CMS's **Kim Roche** in the panel. Many hospices are undergoing surveys under the new survey

protocols for the first time, pointed out NAHC's **Theresa Forster**.

Roche urged hospice management to go on home visits with employees to observe what's actually going on and ask questions. "See what kind of answers you get from staff" to gauge what your survey performance will be like, she recommended.

"Please make sure that your staff ... are aware of the regulations," she asked. Every hospice should have a copy of Medicare's State Operations Manual Appendix M, which spells out hospice guidance to surveyors, she added. You can download that manual section at [www.cms.gov/Regulations-and-Guidance/Guidance/Manuals/downloads/som107ap\\_m\\_hospice.pdf](http://www.cms.gov/Regulations-and-Guidance/Guidance/Manuals/downloads/som107ap_m_hospice.pdf).

To learn more about what surveyors will be looking for when they visit you, you can watch CMS's surveyor training videos at <http://surveyortraining.cms.hhs.gov> -- CMS has posted four hospice broadcasts, including two on QAPI, Roche said.