

## **Hospice Visits when Death is Imminent Measure 2 for the Hospice Quality Reporting Programs (HQRP)**

### **External Questions and Answers**

#### **Q: What is CMS announcing regarding the HQRP?**

**A:** The Centers for Medicare & Medicaid Services (CMS) is announcing that only the three-day measure in the Hospice Visits when Death is Imminent measure pair will be publicly reported on the Hospice Compare website in summer 2019, as stated in the FY 2019 Hospice Final Rule. The seven-day measure in the Hospice Visits when Death is Imminent measure pair will not be publicly reported at this time to allow for additional testing.

#### **Q: What is the Hospice Visits when Death is Imminent measure pair?**

**A:** The Hospice Visits when Death is Imminent measure pair, proposed and finalized in the FY 2017 Hospice Final Rule, assesses whether a hospice patient and caregiver's needs were addressed by hospice staff in the last three and seven days of life, respectively. The three-day measure assesses the percentage of patients receiving at least one visit from a registered nurse, physician, nurse practitioner, or physician assistant in the last three days of life. It will be publicly reported in summer 2019. The seven-day measure assesses the percentage of patients receiving at least two visits from a social worker, chaplain or spiritual counselor, licensed practical nurse, or hospice aide in the last seven days of life. It will not be publicly reported at this time to allow time for additional testing.

#### **Q: Why is CMS not publicly reporting the seven-day Hospice Visits when Death is Imminent measure data at this time?**

**A:** As stated in the FY 2019 Final Rule, quality measures (QM) are added to Hospice Compare once they meet readiness standards for public reporting, which is determined through analysis to assess the reliability, validity, and reportability of the QMs. CMS has conducted testing on the measure pair, and has determined that the seven-day measure does not meet the readiness standards for public reporting at this time. Only the three-day measure will begin to be displayed on Hospice Compare in summer 2019. In the interim, CMS will conduct additional testing on the seven-day measure to determine if changes to the measure specifications and/or the method for displaying the measure are needed. Robust testing ensures measures that are publicly reported are thoroughly evaluated so that Hospice Compare users can depend on accurate information regarding provider quality. CMS will not publicly post data related to the seven-day Hospice Visits when Death is Imminent measure while additional testing takes place.

#### **Q: Is CMS publicly reporting any data related to the seven-day Hospice Visits when Death is Imminent measure?**

**A:** No, CMS has decided *not* to publicly release any of the data related to this measure at this time.

#### **Q: Why is CMS announcing this now?**

**A:** Results from the reliability, validity, and reportability testing of the seven-day measure identified a need for additional testing beyond what has already been conducted. CMS has begun planning a more comprehensive testing agenda for the seven-day Hospice Visits when Death is Imminent measure.

As stated in the FY 2019 Hospice Final Rule, CMS will announce QMs planned for public reporting through sub-regulatory channels and regular HQRP communication strategies, such as Open Door Forums, the Medicare Learning Network, CMS.gov website announcements, listserv notices, and other opportunities. This allows us to share information with hospices and other stakeholders as soon as possible.

**Q: When will the seven-day Hospice Visits when Death is Imminent measure be publicly reported?**

**A:** We have begun additional testing of the seven-day measure. Generally, such testing takes several months to complete. The results of our additional testing will inform next steps regarding the public reporting of this measure. CMS will inform providers regarding our plans to publicly report the seven-day Hospice Visits when Death is Imminent measure through sub-regulatory channels and regular HQRP communications.

**Q: If the results of additional testing do not support public reporting of the seven-day Hospice Visits when Death is Imminent measure, how will it impact the HQRP?**

**A:** CMS will only publicly report QMs that meet our standards of reliability, validity, and reportability. If the additional testing concludes that this measure, as currently specified, should not be publicly reported, CMS will consider how best to proceed with this measure. Any substantive change to the measure (e.g., re-specifying the measure, removing the measure from the program) would be proposed and finalized through notice-and-comment rulemaking.

**Q: Will the seven-day Hospice Visits when Death is Imminent measure still be reported on Certification and Survey Provider Enhanced Reporting (CASPER) QM Reports?**

**A:** Yes, the seven-day Hospice Visits when Death is Imminent measure will be reported on CASPER QM Reports, although it will not be publicly displayed on Hospice Compare at this time. CASPER QM Reports are intended for providers' internal use to aid hospices in quality improvement efforts. Although the measure will not be publicly displayed at this time, CMS believes that it is important for providers to internally review and be informed by these data, to ensure that they are providing their patients and caregivers the support they need in the patients' last days of life.

**Q: Will the seven-day Hospice Visits when Death is Imminent measure be reported on Provider Preview Reports?**

**A.** No, the seven-day Hospice Visits when Death is Imminent measure will not be reported on Provider Preview Reports. Provider Preview Reports are intended for providers to preview their data immediately prior to it being publicly displayed on Hospice Compare. Because the seven-day measure will not be published on Hospice Compare at this time, it will not be included in Provider Preview Reports.

**Q: Will hospices be required to continue reporting data on the seven-day Hospice Visits when Death is Imminent measure?**

**A:** The seven-day measure is calculated using items O5010, O5020 and O5030 from the Hospice Item Set (HIS) V2.00.0. Because the measure is not being removed from the HQRP, providers are still required to complete these items accurately and completely, and submit HIS records to

CMS in a timely manner regardless of the decision to not publicly report the measure at this time. CMS requires the reporting of these items because they are also used to calculate the three-day Hospice Visits when Death is Imminent measure, which will be publicly reported on Hospice Compare in summer 2019. Furthermore, CMS requires the collection of these data to complete additional testing and make a determination about the public reporting of the seven-day Hospice Visits when Death is Imminent measure. Therefore, hospices do not need to change data collection practices and can continue to complete HIS-Admission and HIS-Discharge records as usual.

**Q: What impact will the decision not to publicly report the seven-day Hospice Visits when Death is Imminent measure have on the three-day measure?**

**A:** None; the decision not to publicly report the seven-day measure at this time will have no impact on the public reporting of the three-day Hospice Visits when Death is Imminent measure. As finalized in the FY 2019 Hospice Final Rule, the three-day Hospice Visits when Death is Imminent measure will be publicly reported on Hospice Compare in summer 2019.

**Q: What impact will the decision not to publicly report the seven-day Hospice Visits when Death is Imminent measure have on other HQRP QMs?**

**A:** None; the decision not to publicly report the seven-day measure at this time has no impact on the other HQRP measures. CMS will continue to publicly report the other HQRP measures as planned, including the three-day Hospice Visits when Death is Imminent measure. In addition, the decision not to publicly report the seven-day measure does not have any consequences on payment and is independent of other post-acute care programs.

For more information, please visit the CMS Hospice Quality Reporting Program website at: <https://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/Hospice-Quality-Reporting/index.html>