

CMS Hospice Quality Reporting Program Forum

August 21, 2024

Sabrina Miresse, Ketchum >> Hello, everyone. I'd like to welcome you to today's Hospice Quality Reporting Program, HQRP, Forum with CMS.

My name is Sabrina Miresse from Ketchum, and we are supporting CMS with logistics for today's call. Our presenter for today's discussion will be Jermama Keys, the Hospice Quality Reporting Coordinator at CMS's Division of Chronic and Post-Acute Care within the Center for Clinical Standards and Quality. The slides from today's forum will be published on the HQRP Provider and Stakeholder Engagement webpage in the coming weeks.

Now, I will turn it over to Jermama to start the session with the next slide.

Jermama Keys, CMS >> Good afternoon, everyone, and welcome again, and thank you for joining today's forum.

We will start the presentation about the policies finalized in the fiscal year 2025 Hospice Final Rule. Then, we will be sharing relevant resources related to the Hospice Quality Reporting Program, or HQRP. And finally, we will open it up to Q&A, as time permits.

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On this slide, you will see a list of acronyms that we will use throughout the presentation.

Next slide.

And the next slide will give you an overview of the start of things we will be discussing today. The rule provided updates related to the HQRP and future measures, including finalizing new HQRP measures. Finalizing a new data collection instrument, the Hospice Outcome and Patient

Evaluation, or HOPE. Providing updates on health equity activities. Future quality measures, and the public reporting requirements.

We also finalized changes to the Hospice Consumer Assessment of Healthcare Providers and Systems Survey, or Hospice CAHPS Survey. And we summarize responses to a request for information regarding potential determinants of health, or SDOH elements.

Next, we'll talk about the finalized two quality measures.

This rule added two new process measures to the Hospice Quality Reporting Program, or HQRP. Timely Reassessment of Pain impact, and Timely Reassessment of Non-Pain Symptom Impact. These two measures will be based on the new Hospice Outcomes and Patient Evaluation, or HOPE, instrument, which is also finalized in this rule. We expect to publicly report these new measures no earlier than fiscal year 2028.

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Timely follow-up for pain impact. A Timely Reassessment of Pain Impact measure would indicate the proportion of hospice patients who receive a follow-up visit within two calendar days after being assessed as having moderate or severe symptom impact. The rule defines the specifications for this new measure, including exclusions and other measure calculation details.

Next slide.

Timely follow-up for non-pain symptom impact. The Timely Reassessment of Non-Pain Symptom Impact measure would indicate the proportion of patients who receive a follow-up visit within two calendar days after being assessed as having moderate, severe, non-pain symptom impact. As with the pain impact measure, the rule defines the specifications for this new measure.

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To support both of these new measures, as well as the four measures already adopted in the HQRP, we also finalized the decision to adopt a new standardized patient-level data collection tool known as the Hospice Outcomes and Patient Evaluation, or HOPE, version one. We have previously described HOPE as an entirely new collection tool. However, we do believe that it's better described as a modification of and replacement for the existing HIS tool. CMS will begin collecting HOPE data on or after October 1, 2025.

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HOPE will provide quality measure data for the Hospice Quality Reporting Program through standardized data collection and will provide additional clinical data that could inform future payment refinements.

HOPE is expected to provide hospices with information to help them identify opportunities to adjust their practices and improve patient and agency-level decisions about the care they provide. Furthermore, patients and their families will be more informed about the hospice they choose based on potential public reporting of the HOPE assessment-based QMs.

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Finalized changes from HIS to HOPE. HOPE differs from HIS in several important ways. First, HOPE includes a new time point, the HOPE Update Visit, or HUV. Hospices may conduct up to two HUVs, depending on the patient's length of stay. HOPE would also include modifications to some of the existing HIS, or Hospice Item Set, items to increase specificity. Finally, HOPE includes several new or expanded domains relative to HIS.

These domains would include socio-demographic, living arrangements, availability of assistance, diagnosis, symptom impact assessment, imminent death, and skin.

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The fiscal year rule also provided updates related to future QM development. CMS continues to consider hybrid QMs that could be calculated from multiple data sources. CMS also intends to develop additional hope-based QMs in the future. And to help identify potential future HOPE-based QMs, CMS contractors convened TEP meetings in 2023 and 2022. The TEP supported the further development of Education for Medication Management and Wound Management Addressed in Plan-of-Care Process measure concepts.

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The fiscal year rule also solicited input related to health equity. CMS requested stakeholder comments on which of several social determinants of health, or SDOH, collection items were suitable for the hospice setting, how they should actually be applied, adapted to be appropriate for the hospice setting, and whether other SDOH domains would also be useful for identifying and/or addressing health equity issues in hospice.

Those SDOH domains outlined in the rule were housing instability, food insecurity, utility challenges, and transportation challenges. CMS selected the items proposed for each domain from an existing validated instrument. Most common is for support of including socio-demographic and SEOH data to evaluate health equity in hospice.

CMS, as always, appreciates all stakeholder input regarding the potential inclusion of additional SDOH items in the HQRP, among other efforts to improve hospice health equity. We will consider, and have considered, this input on the proposed and other recommended potential SDOH items in the HQRP as we continue to work to develop and work towards implementation of these data elements.

Next, we will discuss the CAHPS Hospice Survey.

The final rule also finalized several changes to the CAHPS Hospice Survey. This rule adds a web mail survey mode, it shortens and simplifies the survey, and modifies the survey administration protocols to include a pre-notification letter and extended field period.

As part of the revised CAHPS Hospice Survey, the rule adds a new care preference measure and revises two existing measures, the Hospice Team Communication, and Getting Hospice Care Training measures.

This rule also removes three nursing home items and adds survey items impacted by other changes within the rule.

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Finally, this rule includes updates related to the form, manner, and timing of quality measure data submission to support the finalized HOPE instrument. We finalize that hospices begin collecting and submitting HOPE data as of October 1st, 2025. We also finalize that facilities that fail to submit HOPE assessments to CMS for at least 90% of their patients will be subject to a 4% APU reduction. This data submission threshold is identical to the one currently applied to the Hospice Item Set, or HIS.

CMS does plan to retire the Hospice Abstraction Reporting Tool, or HART, and notes that providers will need to select a private vendor to collect and submit HIS and the future HOPE data.

Next is a resource slide.

On this slide, we have links to several relevant resources, the main HQRP webpage, the HOPE webpage, and the Hospice Center and HQRP Help Desk email address. We will also be placing these links in the chat. The next slide is an additional resource slide with two additional resources. There are links to the Provider and Stakeholder Engagement webpage and the Hospice Quality Reporting Training and Education Library.

The Education and Training Library will include new HOPE-related training resources and we encourage you to visit the Education and Training page to access the new HOPE explainer video and web-based training that will be provided this August. We will also be placing these links and email in the chat.

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Okay, we have come to the Q&A portion of this webinar, and we would like to open it up to Q&A. Please place your questions in the chat.

Sabrina Miresse, Ketchum >> Thanks, Jermama. We have now opened it up to Q&A. You may submit questions using the Q&A feature.

If we do not get to your question today, CMS will review it following the session. You can also submit your questions to the HQRP Help Desk using the email that we sent in the chat.

The first question is, “Do we continue to submit the HIS when we start HOPE?”

Jermama Keys, CMS >> I apologize, I couldn't quite get off of mute. There will be some overlap when HOPE begins and HIS ends. In reference to where those submissions will go, there will be additional training that will be provided on HOPE in reference to submission requirements. But as of October 1st, HOPE will be submitted.

Sabrina Miresse, Ketchum >> Thanks, Jermama. We have another question on the HOPE manual. “When can I get the final HOPE guidance manual and the item sets?”

Jermama Keys, CMS >> So, both the HOPE guidance and the final item sets will be provided in early fall. We hope to be able to get those items out to everyone at the end of August or beginning to mid-September.

Sabrina Miresse, Ketchum >> Thank you. There's a CAHPS question. "Do the changes to the CAHPS Hospice Survey include any new measures?"

Jermama Keys, CMS >> So, yes. The revised Hospice CAHPS Survey will actually include two new items that will be used to calculate the new Care Preferences measure.

Sabrina Miresse, Ketchum >> Thank you. Another question, "My vendor needs more information. Where can they find that?" Specifically, about HOPE.

Jermama Keys, CMS >> So, in addition to the final item sets and the HOPE manual, the HOPE data specifications are currently being finalized based on comments and additional questions received by CMS during rulemaking.

And those technical data specifications will actually be released as well in the very near future. We encourage everyone to monitor the CMS listserv and the Hospice QRP announcement and spotlight pages, or page, for those updates.

Sabrina Miresse, Ketchum >> For the next question, I believe you mentioned this, but, "When will HOPE go into effect?"

Jermama Keys, CMS >> No, it's no problem. HOPE data collection will actually begin on October the 1st of 2025.

Sabrina Miresse, Ketchum >> Sabrina Miresse: Thank you. And regarding HOPE, "Will there be any training?"

Jermama Keys, CMS >> Yes. Yes, CMS does plan to provide training for HOPE to ensure that hospices are ready for data collection.

CMS will be providing training, training materials, and several events leading up to the implementation of the actual instrument in October of 2025. As a start, we actually will be

releasing two trainings very soon, and that's going to be an explainer video, which should be titled, "HOPE Time Points." That will give a more clear explanation to providers on how those new time points are actually designed to work, in addition to an introduction to the actual HOPE tool, which is going to be a self-paced, web-based training.

And it is high-level training that can be used by providers and their staff, and it will basically describe HOPE. It will differentiate the HIS and HOPE. It will also describe the data collection time points, and it explains the purpose of the New Symptom Impact data elements.

And as always, HQRP training will be announced on the CMS HQRP website via the Spotlight and Announcement page, and then those trainings will eventually be housed on the Training and Education Library page.

Future trainings surrounding HOPE and its data collection will include information that will give greater detail to the data elements, coding information, and additional information on that transition from HIS to HOPE and how it will actually work.

Sabrina Miresse, Ketchum >> Thank you. We have another CAHPS question.

"Do hospices now have to use the webmail mode?"

Jermama Keys, CMS >> So, no. The webmail mode is just an additional option for actually completing the Hospice CAHPS survey.

The existing modes, the mail-only, the telephone-only, or that mixed mode, which is mail followed by telephone, will still be open and available to everyone.

Sabrina Miresse, Ketchum >> Thank you. Back to HOPE, we have a question, "What is the HOPE tool?"

Jermama Keys, CMS >> So, basically the HOPE tool is going to replace the current Hospice Item Set.

But it still contains many of those same data elements that providers are used to seeing. HOPE would contain new items, and those items would be used to collect additional demographic information, and then the screening for symptom impact, and clinical information, or additional clinical information that contributes to the comprehensive assessment for our hospice patients.

Sabrina Miresse, Ketchum >> Thank you. The next question I have here, “The rule mentions the symptom follow-up visit. Is this different from the SRA?”

Jermama Keys, CMS >> Okay. No, to kind-of globally answer the question. But based on the comments that we received during rulemaking, we revised the language from symptom reassessment which was – sorry -- to the symptom follow-up visit.

So, technically, we are doing a follow-up based on whether the patient experienced moderate or severe symptom impact. The symptom follow-up visit allows LPNs and LVNs to complete that visit. So, both the RN and/or either an LPN or LVN would be able to complete those in-person visits.

Sabrina Miresse, Ketchum >> I have another question here on CAHPS. “When will the changes to the CAHPS Hospice Survey take effect?”

Jermama Keys, CMS >> So, for the – so, what was outlined in the final rule will actually take effect beginning with April 2025 decedents.

Sabrina Miresse, Ketchum >> Thank you. Okay. “How does the HUV work?”

Jermama Keys, CMS >> So, the new time points for the HOPE update visit, or the HUV, each will take place at specified time frames within the first 30 days after an admission to hospice.

The HUV item set is only a subset of the items assessed at admission, and we will be providing more information specifically to HUV and how it actually works with these upcoming trainings, first one being the HOPE explainer video which kind of breaks down that update visit into a little bit more detail for timeframes.

Sabrina Miresse, Ketchum >> Thanks. We have a couple more HOPE questions.

First, “How does HOPE replace the HIS?”

Jermama Keys, CMS >> So, HOPE currently includes a lot of the items that are found on the original HIS, along with some of the new items.

It's designed to collect patient-level data in real time at admission and during the HOPE update visits, which will each take place at their own specified timeframes, and then again at discharge, which provides the HQRP and providers with a more comprehensive view of the care of the delivery to our hospice patients.

Sabrina Miresse, Ketchum >> Thank you. The next one we have is, “Has the timely submission requirement changed?”

Jermama Keys, CMS >> No. No. The timely submission of data to CMS is unchanged. Currently, the HIS admission records and the HIS discharge records must be submitted and accepted by CMS within 30 days.

The implementation of HOPE on October 1, that submission deadline for both the HOPE admission and HOPE discharge will remain the same, and the HUV will be added once HOPE is implemented. The deadlines for the HUV records will also be 30 days, and based on a new item, which we'll see, the date the assessment was completed, it's going to be Z as in zebra, 0350.

And that will be more clearly defined within the manual, and providers will be able to see that information as well with the specification.

Sabrina Miresse, Ketchum >> Thank you. And then the other HOPE question we had was, “What measure will the HOPE data be used for?”

Jermama Keys, CMS >> So, currently, the new HOPE data will be used for the two new quality measures, beginning with the Symptom Impact data elements.

So, the two new process measures, Timely Follow-Up for Pain Impact and the Timely Follow-Up for Non-Pain Symptom Impact were finalized in this year's rule. And that new time point and some of those new data elements will be used to -- for those specific measures.

However, the claims-based measures and the current comprehensive measure is also still bundled into the HOPE so that those measures aren't going away, but the two new measures that are going to be used, or are using HOPE data as well are the two new reassessments or two new follow-up measures.

Sabrina Miresse, Ketchum >> Thank you. I'm seeing another question on HUV. “Why did CMS decide to add the HUV as a time point?”

Jermama Keys, CMS >> So, initially there was a lot of feedback with the TEPs that were held and the time points for that in-person Update Visit and new item were added to make sure that we are informing the two new HOPE-based process measures and the QMs to be able to ultimately help CMS develop future QMs for the HQR. It was better to pull out the Hospice Update Visit to appropriately capture when the visit was being done.

Sabrina Miresse, Ketchum >> Thank you. We have another question. “How did you come up with these items and why?”

Jermama Keys, CMS >> So currently we participated in national testing. And based on the analysis of the testing and participant feedback, CMS was able to carefully review the proposed

data elements over several months before making final decisions about which of those items performed well and which of those items we should include in the first version of HOPE.

Those decisions actually resulted in the removal of many items that were alpha and beta-tested for various reasons, some including performance, some including feedback from actual staff and our reviewers. While some data elements may have outperformed others, the results of that final beta test information provided a firmer basis for the current version of HOPE that you see now that will be implemented in October of '25.

Sabrina Miresse, Ketchum >> Thanks for that. And then a question just to remind everyone, “When will the measures be publicly reported?”

Jermama Keys, CMS >> So, at this time the measures will not be reported sooner than fiscal year 2028, and this is currently what CMS anticipates based on the public reporting requirements and the data that we will receive back from HOPE.

Sabrina Miresse, Ketchum >> Thank you. I just have a couple more here. “When do hospices begin to submit these symptom follow-up visits?”

Jermama Keys, CMS >> So, with the implementation, they'll basically start with HOPE implementation on October 1st. The symptom follow-up visit may be triggered when actually completing the HOPE assessment or the HOPE Hospice Update Visit, if any of those symptoms that are listed on the symptom impact item are documented as moderate or severe.

So that symptom follow-up in-person visit will be expected within those two calendar days. But with the implementation of HOPE and with the start of HOPE in October 2025, that is when hospices should begin to submit their symptom follow-up visits.

Sabrina Miresse, Ketchum >> Okay. Thanks.

The next question is, “Does CMS plan to remove or replace the existing measures with HOPE measures?”

Jermama Keys, CMS >> So, no, at this time.

I mean, it may be considered at a future point, but once the HOPE measures are actually in place. But at this time, there's no plan to remove the HIS measure, the Hospice and Palliative Care Composite Process Measure, or Comprehensive Assessment and Admission Measure, the 3235.

Those items contributing to the measure have actually been incorporated into this first version of HOPE.

Sabrina Miresse, Ketchum >> Thank you. And then we'll do one more question. “What are CMS's plans for HCI?”

Jermama Keys, CMS >> So, currently we are continuing to analyze the data for HCI, and there is a possibility that we may need to make some adjustments to that measure in the future, but we do not have any plans of changing HCI at the moment.

Sabrina Miresse, Ketchum >> Thank you, Jermama. That will conclude the Q&A portion.

Again, if we didn't get to your question today, CMS will review it following the session. And you can also submit your questions to the HQRP Help Desk email. And I will now pass it to Jermama again to conclude the session on the next slide.

Jermama Keys, CMS >> This is just a thank you to everyone joining today. Again, there were a lot of questions. We appreciate all of the Q&A.

We do keep and have a record of each of these questions, and we do plan to make sure that they are addressed if they're not covered in the upcoming trainings that you're going to see. Again,

and we want to be able to put those out, or we're still working to be able to put those two trainings out in August.

The HOPE explainer video is something that providers should be able to key into within the next two weeks. And we're also working to put out the additional web-based training video. But, again, if you have any additional thoughts, any questions, please email us at the HQRP Help Desk.

And, again, those questions that we did receive via the Q&A today, we will work to provide responses for those Q&A questions. That actually concludes today's forum, and I want each of you to have a great rest of your day.