

# Hospice Quality Reporting Program Quarterly Updates for July – September 2022

*This document provides Hospice Quality Reporting Program (HQRP)-related updates on events and guidance from the 3<sup>rd</sup> Quarter of 2022 (July – September 2022) and prepares for the 4<sup>th</sup> Quarter of 2022 (October 2022 – December 2022).*

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## Tips of the Quarter

### HVLDL and HCI Added in August 2022 Refresh

The new claims-based HQRP measures, the Hospice Care Index (or HCI) and the Hospice Visits in the Last Days of Life (or HVLDL), were not added to public display for the May 2022 refresh due to technical issues with the measure calculations. CMS corrected the technical issues, and the August 2022 Refresh was the inaugural public display of these new quality measures. New provider preview reports including the claims-based measures were released to providers on May 25, 2022.

## Section 1: HQRP Updates

### HQRP Compliance Reminders

- **General Requirements:** HQRP data collection requirements for both the Hospice Item Set (HIS) and CAHPS® Hospice Survey are defined for the **Calendar Year (CY): January 1-December 31**. To comply with the HQRP, each CY hospices must submit and ensure acceptance of at least 90% of all required Hospice Item Set (HIS) records by the 30-day submission deadline and participate monthly with the CAHPS® Hospice Survey by utilizing a CMS-approved third-party vendor, in accordance with HQRP requirements. Since administrative data is collected from claims, hospices with claims data are 100% compliant with the HCI and HVLDL claims-based measure submission requirements.

**Please Note:** This document is not intended to be used as a guidance document as the information it contains may be time-limited. Please check the HQRP Announcements and Spotlight webpage at <https://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/Hospice-Quality-Reporting/Spotlight.html> for all updates related to the HQRP.

- **Payment** is impacted during the corresponding **Fiscal Year (FY): October 1-September 30**. Hospices are subject to a payment reduction in their annual payment update (APU) if they fail to comply with the HQRP requirements. Beginning in FY 2024 (CY 2022 data) the APU penalty will increase from 2% to 4%.

**Notification to Non-compliant Hospice Providers Based on Their CY 2021 Quality Data Impacting FY 2023 Payments:**

If a hospice is non-compliant with the HQRP for FY 2023 based on their CY 2021 quality data, then they will be notified in two ways. Non-compliant hospices will receive a notification from their Medicare Administrative Contractor (MAC) and a notification in their facility’s Certification and Survey Provider Enhanced Reports (CASPER) folder. Either notification is an official notice. Letters notifying hospices of non-compliance were distributed in mid-July of 2022.

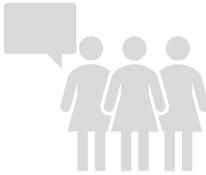
Non-compliant providers had thirty (30) days from the date on the notification of non-compliance to submit a request for reconsideration. In September 2022, CMS notified hospices of the Agency’s decision on received reconsideration requests.

**FY 2022 APU List Now Available**

The list of Hospices that successfully met QRP reporting requirements for the FY2022 APU has been posted to the HQRP website. Please visit the downloads section of the [Requirements and Best Practices](#) webpage to download the FY2022 APU list.

**Section 2: HOPE Updates**

**HOPE Development Process**

HOPE Information Gathering	HOPE Testing	HOPE Rulemaking	HOPE Implementation	HOPE Quality Measures
				

CMS and their contractor, Abt Associates, continue testing the draft standardized patient assessment tool for the HQRP, called Hospice Outcomes & Patient Evaluation (HOPE). The draft HOPE assessment is currently in the final phase of testing, the HOPE Beta Test. We thank all hospices participating in the beta test for their outstanding efforts! Additional information about HOPE is available on the [HOPE](#) webpage.

The Beta Test includes HOPE assessments completed by registered nurses, social workers, and chaplains at several time points during the hospice election. The focus of the Beta Test is on the reliability, validity and feasibility of the assessment items. Through Spring 2023, the Beta Test Team will analyze all of the

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data and feedback collected from the hospice teams to inform decisions for the final version of the HOPE assessment and the implementation of HOPE.

The development of HOPE is an important part of the Meaningful Measures initiative to improve outcomes for patients, their families, caregivers, and providers while also reducing burden on providers and clinicians. The HOPE assessment is important for developing a set of hospice quality measures, including outcome measures that reflect the needs of patients, their families, and caregivers throughout the hospice stay.

## Section 3: Public Reporting Updates

The section below includes key public reporting dates. Providers should review the timeline to ensure they are familiar with these important upcoming public reporting dates, and refer to the [Public Reporting: Key Dates for Providers](#) webpage on the HQRP website for more information.

### November 2022 Care Compare Refresh

The next Care Compare Refresh will take place in November 2022. This Refresh will include:

- HIS quality measure results from Quarter 1 2021 – Quarter 4 2021.
- CAHPS® Hospice Survey data reflecting Q3 2019 – Q4 2019 and Q3 2020 – Q4 2021; only the survey measure results will be refreshed.
- Claims-based measure results reflecting Q3 2019 – Q4 2019 and Q3 2020 – Q4 2021.

Because the new claims-based HVLDL and HCI measures were added to Care Compare in the August Refresh, the November Refresh will not update the claims-based measures as previously planned. The next update of the claims-based measures will occur in November 2023.

The Provider Preview Report were issued on August 17, 2022. Providers have 30 days to review their quality measure results in CASPER prior to the November 2022 Care Compare refresh, when this data will be publicly displayed. Although the actual “preview period” is 30 days, the reports will continue to be available for another 30 days, or a total of 60 days. CMS encourages providers to download and save their Hospice Provider Preview Reports for future reference, as they will no longer be available in CASPER after this 60-day period.

## Section 4: Other Updates, Announcements, and Resources

To stay informed about compliance with HQRP Requirements, read the Hospice Final Rule and the materials offered on the [Hospice Center, HQRP Announcements and Spotlight](#) webpage, [HQRP Requirements and Best Practices](#) webpage, [Training and Education Library](#) webpage, and [Reconsideration Requests](#) webpage. To stay informed about HQRP updates, subscribe to the [Post-Acute Care listserv](#).

## Educational Events and Trainings

### HQRP Forum – Fall 2022

On September 28, 2022, CMS held an HQRP Forum providing an overview of the FY 2023 Hospice Final Rule. Resources from this Forum are posted on the [HQRP Provider and Stakeholder Engagement](#) webpage.

### Health Equity Technical Expert Panel (TEP)

Abt Associates is convening a Technical Expert Panel for the Hospice Quality Reporting Program & Home Health QRP Health Equity Structural Composite Measure Development (HE TEP). The HE TEP nomination period was July 15 – August 12, 2022. The HE TEP will be composed of individuals with differing areas of expertise and perspectives, including representatives from patient advocacy groups, clinical and administrative staff from home health and hospice providers, and health equity experts. This diverse group of 10-15 stakeholders is charged with providing thoughtful input and direction on the development of a health equity measure concept to be used in both hospice and home health settings. The HE TEP will convene virtually in November 2022 (dates TBD).

### New and Updated Resources

- **Hospice Care Index (HCI) Explanatory Video:** CMS has released a new video resource explaining the purpose and design of the claims-based HCI quality measure. You can access the video on the [CMS YouTube channel](#).
- **HQRP Explanatory Video:** CMS has released a new video resource providing an overview of the HQRP. You can access the video on the [CMS YouTube channel](#).
- In August 2022, CMS posted two updated documents to the [HQRP Requirements and Best Practices](#) webpage: **Getting Started with Review and Correct Reports** and **Getting Started with CASPER QM Reports**. These updates added new screenshots with detailed explanations of the most current reports available to providers, to help in understanding and using the reports. These revised documents are located on the [HQRP Requirements and Best Practices](#) webpage in the **Provider Toolkit** section of the Downloads.
- On September 14<sup>th</sup>, 2022, CMS posted the **Third Edition HQRP Public Reporting Tip Sheet**. The purpose of this tip sheet is to help providers understand public reporting for the HQRP in the midst of the COVID-19 Public Health Emergency (PHE). This document is located on the [HQRP Requirements and Best Practices](#) webpage in the **Provider Toolkit** section of the Downloads.

## Section 5: What's New in the 4<sup>th</sup> Quarter of 2022

For updates about new resources or changes to the schedule, please check out the CMS website and sign up for the post-acute care ListServ, ODFs, and the MLN Weekly Newsletter on the HQRP website at: <https://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/Hospice-Quality-Reporting/index.html>.

## **Home Health, Hospice, & DME Open Door Forums (ODFs)**

The next ODFs for the HQRP are scheduled for the following dates at 2 PM EST:

- September 21, 2022
- November 2, 2022

### **HQRP Forum – Winter 2022**

In December 2022, CMS will hold an HQRP Forum providing updates regarding HOPE testing.

## **Section 6: Questions and Answers**

### **Question 1:**

When reviewing our Provider Preview Reports for the claims-based measures and looking at the [Public Reporting Key Dates for Providers](#) webpage, it appears that the dates are unchanged. The same time period is showing: 4/1/2019 – 12/31/2019 and 7/1/2020 – 9/30/2021. Can you explain why these have not changed?

### **Answer 1:**

For the two claims-based measures, Hospice Visits in the Last Days of Life (HVLDL) (NQF #3645) and the Hospice Care Index (HCI), the date range you are seeing is correct.

These claims-based measures will use the date range mentioned above until the November 2023 Refresh. Until then, there will be no refresh and in November 2023 refresh the HVLDL and HCI claims-based measures will normalize to use eight consecutive quarters (two full calendar years). After that, claims-based measures will be refreshed annually. So, until that time, you will only see data from Quarter 2 2019 – Quarter 4 2019 and Quarter 3 2020 – Quarter 3 2021, or stated another way, 4/1/2019 – 12/31/2019 and 7/1/2020 – 9/30/2021.

Please visit the Downloads section of the [Hospice Public Reporting: Background and Announcements](#) page on the [CMS HQRP website](#) for more detailed answers to questions about the claims-based measures. The document is also included here: <https://www.cms.gov/files/document/questionsandanswersclaims-basedmeasuresfeb2022.pdf>.

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### **Question 2:**

We recently received a letter of non-compliance from CMS stating that our hospice payments will decrease by 2% for the next fiscal year. We regularly submit our HIS measures through the QIES system, and we are not sure what we are doing wrong. Can someone please assist us?

### **Answer 2:**

In July, CMS issues notices of non-compliance to hospices that failed to meet HQRP requirements for the previous CY [for FY 2023, this is CY 2021]. Hospices may then file for reconsideration (within 30 days) if they receive a letter of HQRP non-compliance and believe the finding is in error. CMS only issues non-compliance letters.

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For the FY 2023 Annual Payment Update (APU) reporting year a hospice must have submitted at least 90 percent of all HIS records within 30 days of the event date (patient’s admission or discharge) for patient admissions/discharges occurring January 1, 2021 – December 31, 2021, **AND** ensure ongoing monthly participation (from January through December) in the CAHPS® Hospice Survey with an approved third-party vendor that submits data according to the quarterly deadlines on behalf of the hospice. APU penalties impact the full FY. As a reminder, beginning with the FY 2024 APU (CY 2022 data), the APU penalty increased from 2% to 4%.

We suggest you consider visiting the [Requirements and Best Practices](#) page of the [CMS HQR website](#). In particular, the documents listed at the bottom of the page under the “Provider Toolkit” will address how to get started with the HQR. We recommend the [Getting Started with the Hospice Quality Reporting Program](#) resource as well as the [HQR Compliance Tip Sheet](#).

More information about Reconsideration Requests and the FY payment impacts can also be found on the [HQR Reconsideration Requests](#) webpage.