

Getting Started with the Hospice Quality Reporting Program

This document provides detailed information on the requirements of the Hospice Item Set (HIS) and Hospice Consumer Assessment of Healthcare Providers and Systems® (CAHPS®). It is designed especially for new providers and staff, and provides comprehensive detail on the background of each requirement, data submission deadlines, possible exemptions, tips for compliance, and links to useful resources, including Help Desks.

The Hospice Quality Reporting Program (HQRP) promotes the delivery of person-centered, high-quality, and safe care by hospices. Currently, there are two requirements for the HQRP:

- 1. Hospice Item Set (HIS)
- 2. Consumer Assessment of Healthcare Providers and Systems® (CAHPS®) Hospice Survey



The HQRP was created by Section 3004 of the Affordable Care Act, which specified that beginning with Fiscal Year (FY) 2014 and each subsequent FY, the Secretary shall reduce the market basket update (also known as the Annual Payment Update, or APU) by 2 percentage points for any hospice that does not comply with the quality data submission requirements with respect to that FY. To be compliant with the HQRP overall, hospice providers must comply with the individual requirements of both HIS and CAHPS®, which differ. Failure to comply with either or both of the reporting requirements will result in the 2 percentage-point APU reduction. Individual compliance requirements for HIS and CAHPS® are discussed in greater detail, below. The CMS HQRP Website is the official website of the HQRP. Providers should bookmark this website and check it often for updates.

Section 1: HIS

Who is required to submit data: As of July 1, 2014, all Medicare-certified hospice providers must submit HIS data (a HIS-Admission and HIS-Discharge record) on all patient admissions and discharges. HIS data are collected and submitted on *all* patient admissions, regardless of the payer, patient's age, or location of the receipt of hospice services.

For new hospice providers: For new providers, there are two considerations: when to begin submitting HIS data and when you may be subject to the Annual Payment Update (APU) reduction for HIS purposes.

- When to begin HIS data submission: Providers must submit HIS data (an HIS-Admission and HIS-Discharge record) for all patient admissions on or after on the date in the CMS Certification Number (CCN) notification letter letterhead.
- <u>APU determination</u>: Although new providers are required to being submitting HIS data for patient admissions on or after the date in the CCN letterhead, a new hospice with a CCN notification letter dated on or after November 1st will not be subject to the 2 percentage-point APU reduction for that one year only. In this situation, if a hospice is found non-compliant, then that hospice will need to follow the reconsideration process and attach their CCN notification letter and any other relevant documents to support their newness status.

HIS Data Collection: HIS Data collection consists of collecting or abstracting data from patient clinical records to complete HIS Items. To ensure successful HIS data collection, providers should review materials available on the CMS HQRP website, including:

- Reading the HIS Manual (available on the <u>HIS Webpage</u>), which provides instructions for completing HIS items, as well as clinical examples for each item.
- Watching HIS Data Collection Trainings, which are available on the <u>Hospice Quality Reporting</u> <u>Training Webpage</u>.
- For questions about HIS data collection processes, providers should contact the Quality Help Desk at HospiceQualityQuestions@cms.hhs.gov.

HIS Data Submission: Providers must convert HIS data into the proper electronic file format (XML) and submit all HIS records to CMS via Quality Improvement and Evaluation System (QIES) Assessment Submission and Processing (ASAP). Hospice providers *do not* need to have an electronic medical record to convert/submit HIS data.

- To convert HIS records, providers should acquire the appropriate software (either HART or a vendor-designed software). The decision to use HART or a vendor software is a provider decision. Providers who wish to use HART to complete HIS records can download the software free of charge here.
- To submit HIS data to QIES ASAP, providers will need to register for two User IDs: a CMSNet User ID and a QIES User ID.
 - Providers can register for the CMSNet User ID <u>here</u> using the "Hospice CMSNet Online Registration" application link.
 - Once successfully logged onto the CMS Network using the CMSNet User ID, providers can register for a QIES User ID. Further information on registering for the QIES User ID can be here found under "QIES User ID."
- For questions about registering for User IDs and the HART or QIES ASAP systems, contact the Technical Help Desk at (877)-201-4721(Monday-Friday from 7:00 AM – 7:00 PM CT), or by email at help@qtso.com.

Ensuring Successful Data Submission: After each data submission to QIES ASAP, providers MUST verify that the data submitted were **ACCEPTED** by QIES ASAP.

- When an HIS file is uploaded to QIES ASAP, providers will receive two confirmation messages: an "Upload Completed" message and a "Submission Received" message. These initial two confirmation messages only indicate that the file has been submitted to QIES ASAP; they do not indicate that the file has been successfully ACCEPTED by QIES ASAP and CMS.
- To ensure a file has been ACCEPTED without error, check the Final Validation Report in Certification And Survey Provider Enhances Reports (CASPER). For instructions on how to checking the submission status of a file in the Final Validation Report, please refer to <u>Appendix A</u> of the CASPER Reporting Hospice Provider User's Guide.
- If 1) a Final Validation Report is not received following the submission of HIS records or 2) a Final Validation Report is received with fatal errors listed, the data submission was not successful, and the provider must correct any errors and resubmit relevant HIS records to QIES ASAP.
- Providers should print and retain Final Validation Reports as evidence of successful submission and processing of HIS records.
- For questions about verifying that a submission was successfully received and processed, contact the QTSO Help Desk at help@gtso.com or at 1-877-201-4721.

Data Submission Deadlines: HIS data is submitted on a rolling basis; HIS records must be submitted and **ACCEPTED** within 30 days of the target date (patient's admission or discharge).

HIS Compliance: HIS compliance is based on timeliness of data submission; hospice providers must submit a minimum percentage of their HIS records on time to be compliant.

- For the FY '19 APU year (HIS records with a target date 1/1/17 12/31/17) providers must submit at least 80% of their HIS records by the 30-day deadline.
- For the FY '20 APU (HIS records with a target date 1/1/18 12/31/18) providers must submit at least 90% of their HIS records by the 30-day deadline.
- The "Timeliness Compliance Threshold Fact Sheet" available here has more information on compliance with HIS timeliness requirements.

Section 2: Hospice CAHPS®:

Who is required to submit data: National implementation of the CAHPS® Hospice Survey began January 1, 2015. In general, all Medicare-certified hospices are required to submit Hospice CAHPS® data. However, there are two exemptions for Hospice CAHPS® reporting: newness exemption and size exemption.

- **Newness exemption:** For hospices who received their CCN on/after January 1st of the data collection year. This is a one-time exemption that will be automatically granted by CMS, no action is required from hospice providers to receive this exemption.
- **Size Exemption:** For hospices with fewer than 50 survey-eligible decedents in the prior calendar year. This exemption is not automatically granted; hospices must complete the request form annually by the size exemption form deadline.
 - The size exemption form is available on the CAHPS® survey web site. Hospice providers must submit the form annually, by the specified deadline, to be eligible for the exemption.
- For questions about the CAHPS® survey and data submission requirements, please contact the CAHPS Help Desk at:

Data Collection and Submission: Eligible hospices *must* contract with a CMS-approved vendor to conduct their CAHPS® surveys and submit their CAHPS® data. CAHPS® data is submitted by your vendor to the CAHPS® data warehouse.

- A list of approved survey vendors can be found by accessing the left hand Approved Vendor List navigation button on the <u>CAHPS® Hospice Survey Website</u>
- After contracting with an approved survey vendor, the hospice will need to complete and submit a CAHPS® Hospice Survey Vendor Authorization Form. To view or download the CAHPS® Hospice Survey Vendor Authorization Form, visit the <u>Technical Specifications Webpage</u>.

Data Submission Deadlines: Your vendor must submit data quarterly. The deadlines for data submission are the second Wednesday of February, May, August, and November.

Ensuring Successful Data Submission: Although vendors submit CAHPS® data on behalf of hospice providers, providers should maintain close contact with their vendor to ensure they are meeting quarterly deadlines and to ensure data submitted by the vendor has been ACCEPTED by CMS.

- Hospice providers s should contact their vendor to ensure the vendor is submitting data in ample time to meet the quarterly deadlines.
- Hospice providers can sign up for data submission reports at the <u>Information for Hospices</u>
 <u>Webpage</u> to monitor their vendor's actions and ensure submitted data have been accepted.

CAHPS® Compliance: CAHPS® compliance is determined based on whether your vendor successfully submits a total of 4 quarters worth of data to the CAHPS® data warehouse, with each submission made by the quarterly deadline. This means:

- Each quarterly submission must be complete (have 3 months or 1 quarter's worth of data)
- Each quarterly submission must be submitted AND ACCEPTED by the quarterly data submission deadline

For More Information: For more information about the Hospice CAHPS® Survey, please access the survey website, www.hospicecahpssurvey.org or contact the technical assistance project team at hospicecahpssurvey@HCQIS.org or 1-844-472-4621.