

HQRP: Achieving a Full Annual Payment Update (APU)

August 2025



Introduction

Acronyms

- **APU** – Annual Payment Update
- **CAHPS**[®] – Consumer Assessment of Healthcare Providers and Systems
- **CMS** – Centers for Medicare & Medicaid Services
- **CY** – Calendar Year
- **FY** – Fiscal Year
- **HIS** – Hospice Item Set
- **HOPE** – Hospice Outcomes and Patient Evaluation
- **HQRP** – Hospice Quality Reporting Program

Acronyms (cont.)

- **iQIES** – Internet Quality Improvement and Evaluation System
- **MAC** – Medicare Administrative Contractor
- **PHI** – Protected Health Information
- **PII** – Personally Identifiable Information
- **QM** – Quality Measure
- **QTSO** – QIES Technical Support Office
- **VR** – Validation Report

Learning Objectives

- Describe the structure and purpose of HQRP.
- Identify HQRP requirements including:
 - HOPE tool
 - CAHPS Hospice Survey
 - Administrative claims data
- Describe how to use available iQIES reports to support HQRP compliance.

Learning Objectives (cont.)

- Explain the APU calculation process, timelines, and notification.
- Review steps and timing for requesting reconsideration and secondary appeals.
- Describe the exceptions for extraordinary circumstances, including CMS waivers and provider-initiated requests.
- Locate and use CMS resources and help desks.

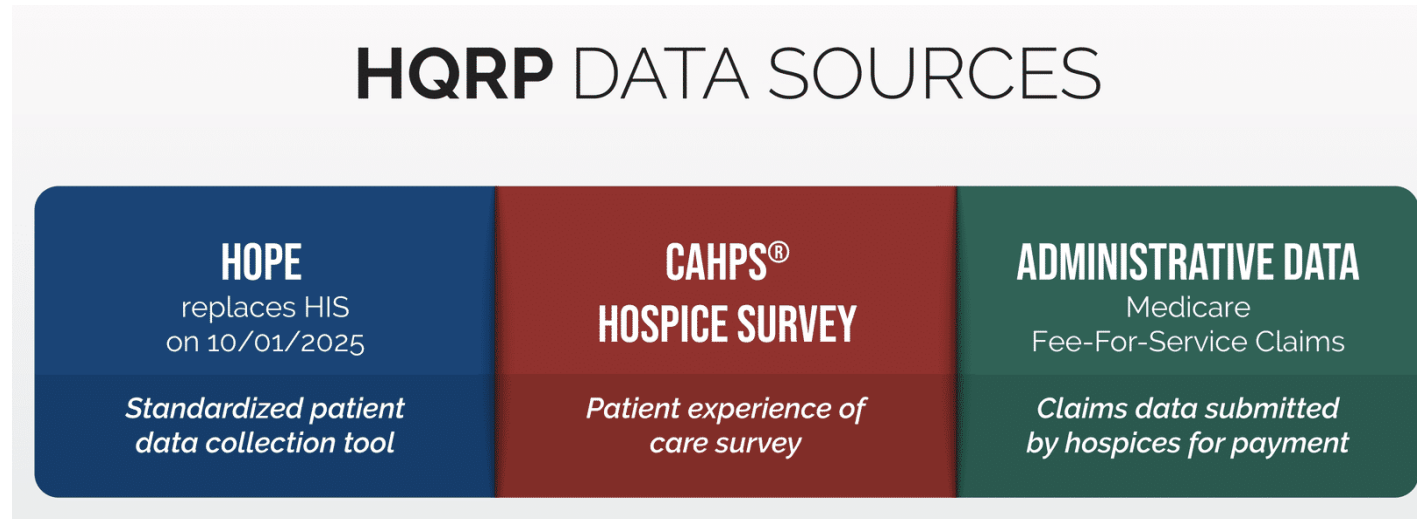
Structure and Purpose of the HQRP

Purpose and Goals of HQRP

- Promote high-quality, person-centered, and safe hospice care through data-driven accountability.



Measuring HQRP Compliance



- HQRP compliance is measured by data submission and acceptance.
- Timeliness and accuracy of data submission and acceptance are critical to avoid payment penalties.

HQRP Data Submission Requirements: Overview

Calendar and Fiscal Years Explained

- **Calendar Year (CY)**
January 1–December 31
- **Fiscal Year (FY)**
October 1–September 30



Data Submission Requirements: HOPE

- Beginning October 1, 2025, HOPE replaces the HIS. HOPE has the same data submission requirements as the HIS:
 - HOPE data submission deadline is 30 days from the target date.
 - 90 percent of all HOPE assessments must be submitted within 30 days of the target date.

HOPE Records From	Submission Threshold	Reporting Year
Calendar Year 2026 and beyond	90%	Fiscal Year 2028 and beyond



Data Submission Requirements: CAHPS

- Data must be submitted by a CMS-approved vendor for all 12 months of the CY (January - December) with each submission made once a quarter by the quarterly deadline.



Data Submission Requirements: Administrative Claims Data

- Administrative claims data comes from hospice payment claims.
- Compliance is automatically achieved through claims submissions.

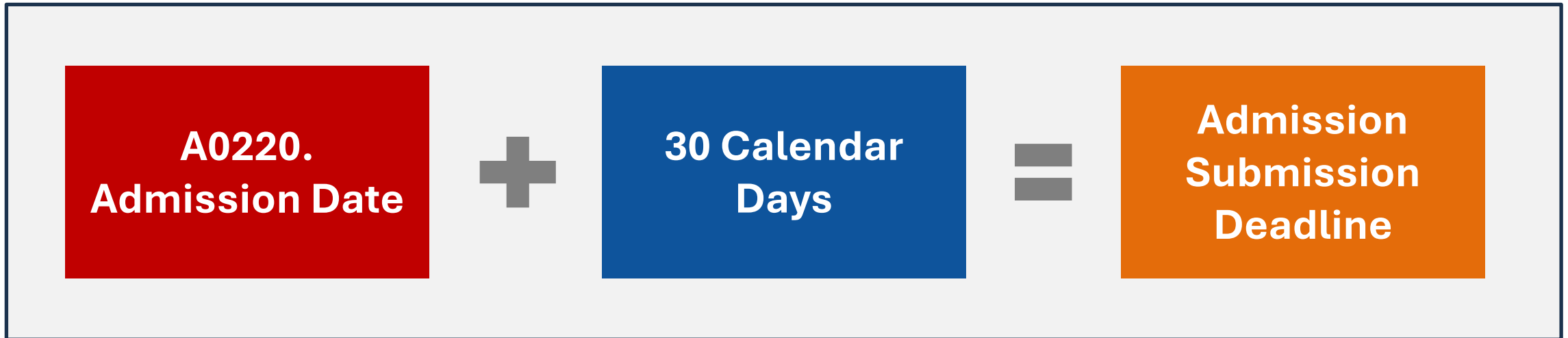


HQRP Data Submission: HOPE

HOPE Data Submission Date and Deadline

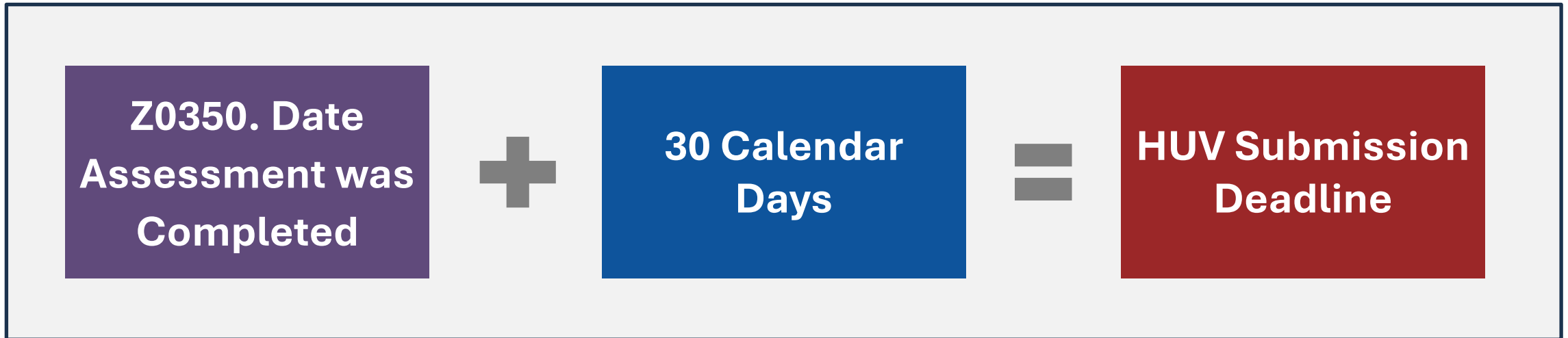
- All HOPE timepoints have a 30-day submission requirement.
- **Submission Date:** The submission date is defined as the date on which the completed record was submitted to CMS. The submission date should be no later than the submission deadline.
- **Submission Deadline:** The submission deadline is defined as the latest possible date on which the HOPE record should be submitted to and accepted by CMS.

Data Submission Deadline: HOPE Admission



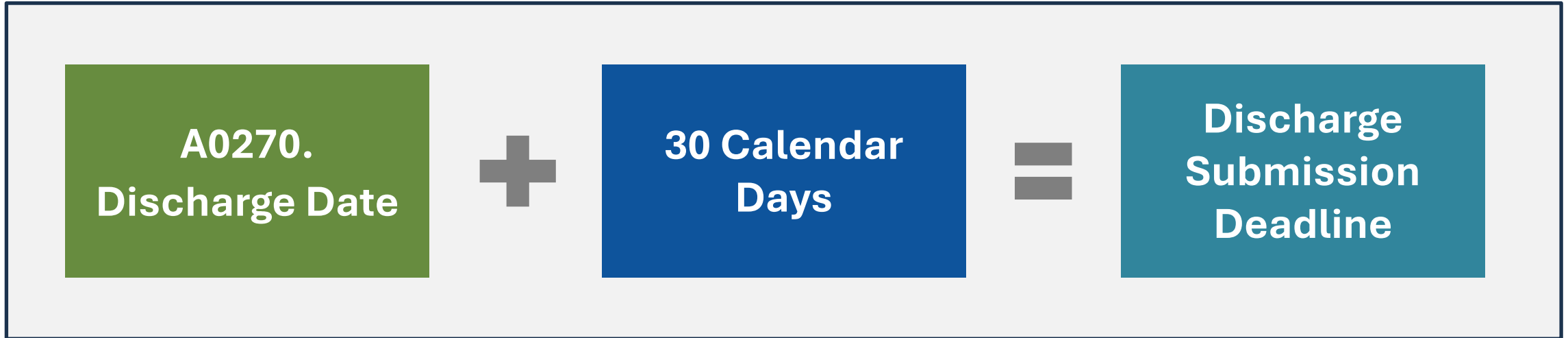
HOPE Admission record is submitted and accepted no later than
A0220. Admission Date + 30 calendar days.

Data Submission Deadline: HOPE Update Visits (HUVs)



HUV record is submitted and accepted no later than
Z0350. Date Assessment was Completed + 30 calendar days.

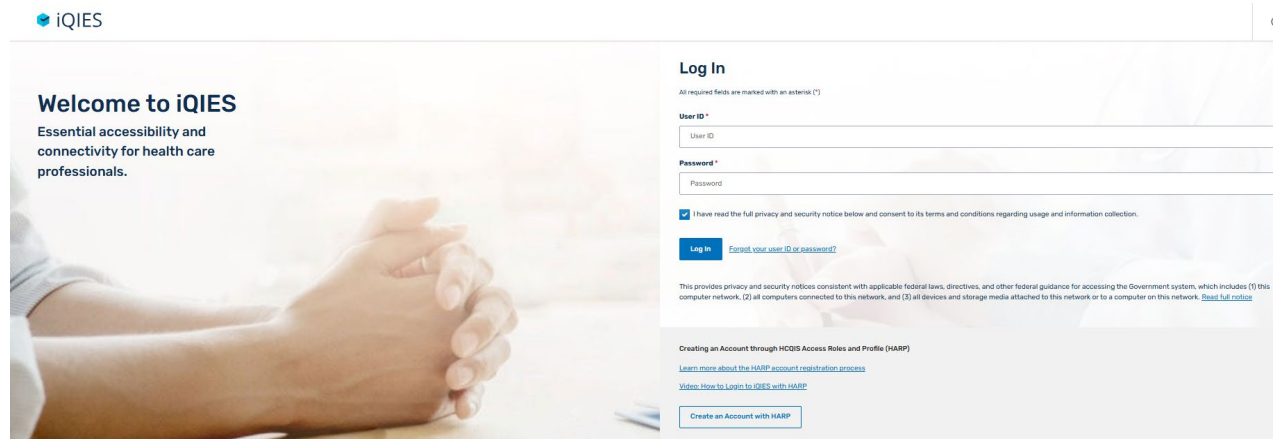
Data Submission Deadline: HOPE Discharge



HOPE Discharge record is submitted and accepted no later than
A0270. Discharge Date + 30 calendar days.

Process for Submitting HOPE Data

- HOPE records are submitted to CMS via iQIES.
- Ensure that your HOPE submissions are in the correct format, contain the correct information, and are accepted by iQIES.
 - The act of submission does not equal acceptance.
- iQIES provides hospices with reports to assist in validating data submissions.



Monitoring HOPE Data Submission with iQIES Reports

- Reports Available in iQIES October 1, 2025:
 - Timeliness Compliance Threshold
 - Final Validation Report



HQRP Data Submission: CAHPS

CAHPS Data: Where Do You Submit Data?

- Compliance = **successful** submission of survey data to the CAHPS Hospice Survey Data Warehouse.
- Apply for access to the CAHPS Hospice Survey Data Warehouse so you can get reports about your data submission.
- Keep in touch with your vendor to ensure submissions are occurring as planned.



CAHPS Data:

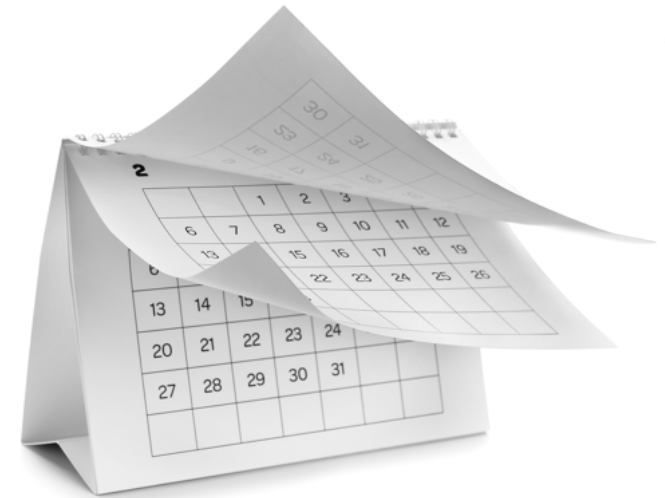
How to Ensure That Data Submitted Are Accepted?

- Contract with a CMS-approved survey vendor.
- Authorize your vendor to submit your CAHPS data.
- Monitor CAHPS data submission.
- Make sure your vendor is submitting your CAHPS data before the deadline.
- Make sure you know how to get your reports from the CAHPS Hospice Data Warehouse.
- Complete a "Survey Vendor Authorization Form" (found on the Hospice CAHPS Survey website) if you want to change vendors.

CAHPS Data: When to Submit Data?

- CAHPS Hospice Survey data is submitted quarterly to the CAHPS Hospice Survey Data Warehouse by your vendor.
- Quarterly submissions are due on the second Wednesday of the months of February, May, August, and November.

**CAHPS® Hospice
Survey Data Warehouse
occurs quarterly.**



CAHPS Hospice Survey: Exemptions

- Two exemptions from CAHPS Survey.
 - Both are unique to CAHPS and do not apply to HOPE.
 - CAHPS Size Exemption.
 - CAHPS Newness Exemption.



CAHPS Hospice Survey: Size Exemption

- If your hospice served **fewer than 50 survey-eligible** in a given calendar year, or reference year, you are eligible to apply for a size exemption.
- To apply for the size exemption:
 - Go to the [CAHPS Hospice Survey](#) website
 - Select the “Participation Exemption for Size” form (found under Information for Hospices/Forms)
 - Fill out and submit the Participation Exemption for Size form online.

CAHPS Hospice Survey: Size Exemption (cont. 1)

- To fill out the Participation Exemption for Size Form, count decedents in the reference year.
- Reference year = previous calendar year.
- An Exemption is good for one year only.
- Annual size exemption requests must be submitted by the deadline.

Example:

- Current data collection year: **2026**
- Reference year: **2025**
- Deadline for requesting size exemption: **December 31, 2026** (for the 2026 data collection year)

CAHPS Hospice Survey: Size Exemption (cont. 2)

- After you submit the Participation Exemption for Size Form:
 - You will get an acknowledgement email.
 - Submitting the form does **not** guarantee you are approved.
- CMS checks your counts to make a determination on approving your hospice for a size exemption
- Save the acknowledgement email for future reference!

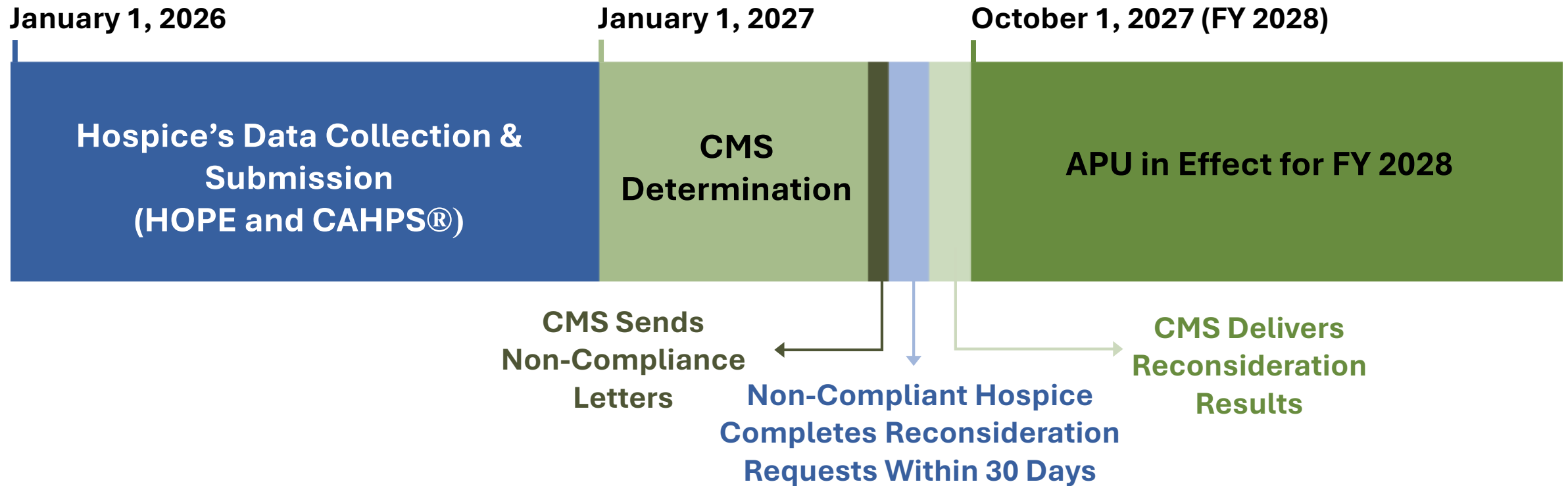
CAHPS Hospice Survey: Newness Exemption

- If you receive a new CCN on or after the start of the data collection year then:
 - CMS automatically grants an exemption for the CY that your hospice is assigned its CCN.
 - Example: For the CY 2026, hospices that received their CCN any time in 2026 are required to participate beginning with January 2027 decedents.
- Save the letter and envelope that issues your new CCN.



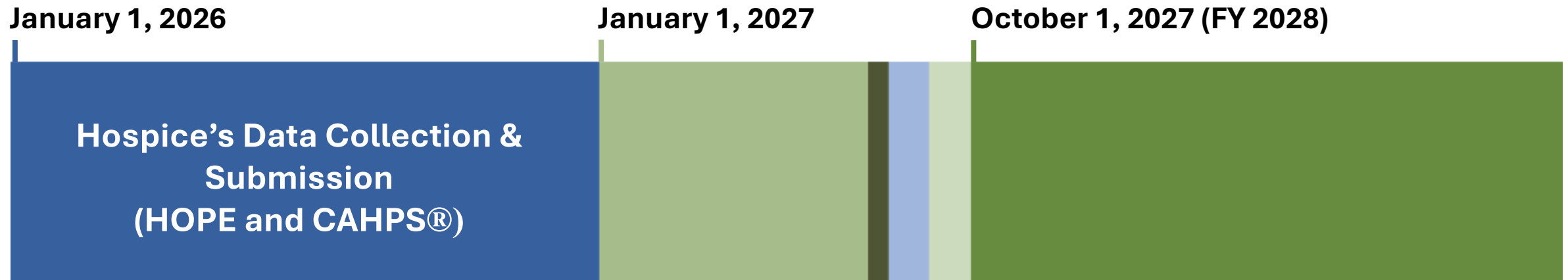
The HQRP Life Cycle: Determining Compliance

The HQRP Life Cycle: APU Calculations



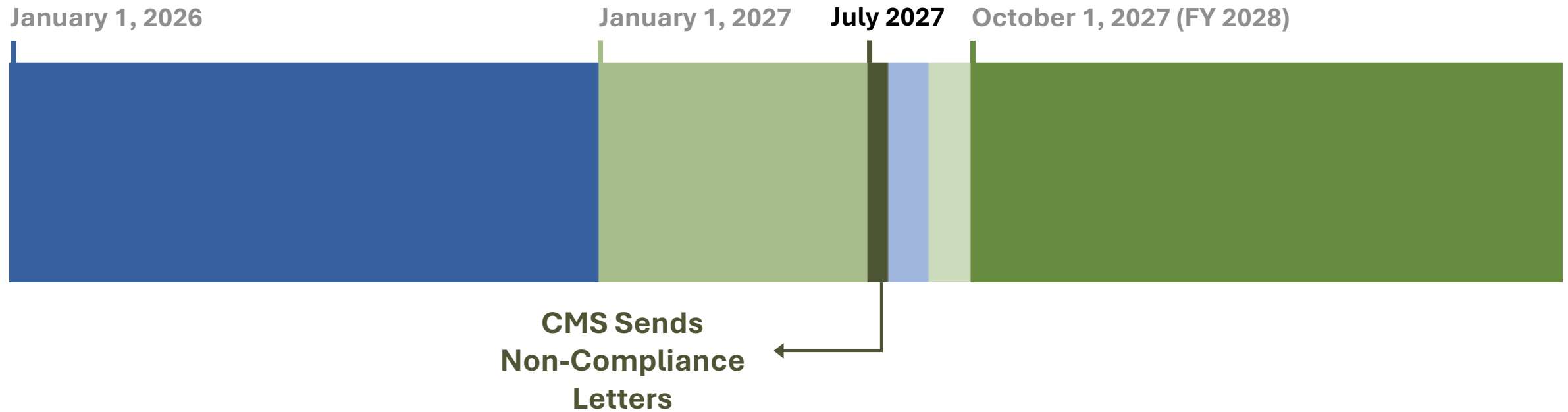
- Non-compliant hospices are subject to the four percent (4%) penalty in APU for the corresponding FY.

The HQRP Life Cycle: Data Submission



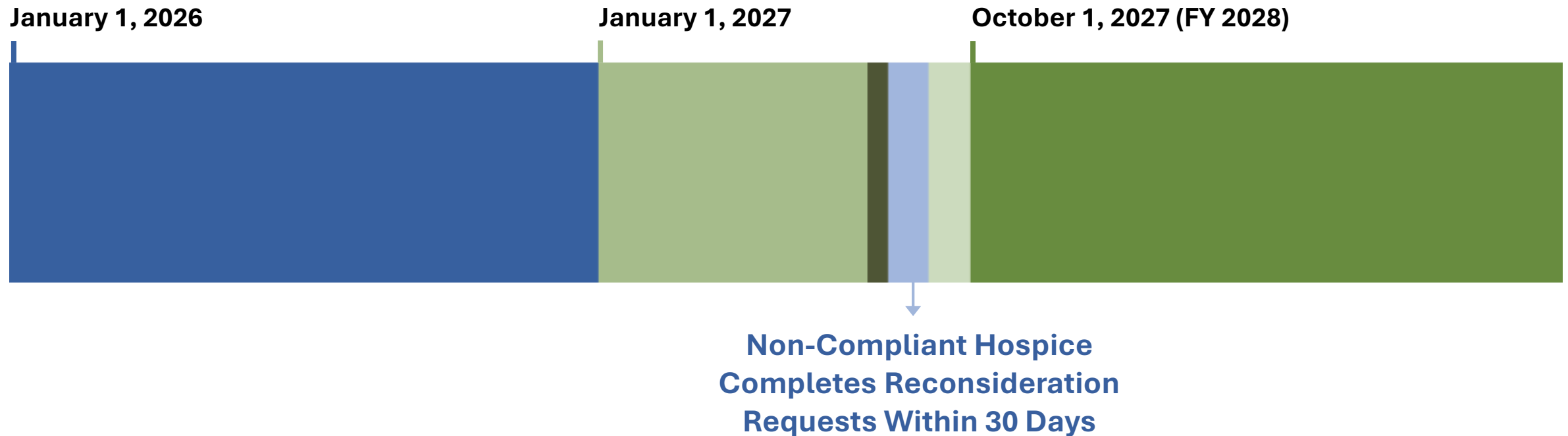
- The calculation of the APU includes data from HOPE and CAHPS.

The HQRP Life Cycle: Non-Compliance Letters



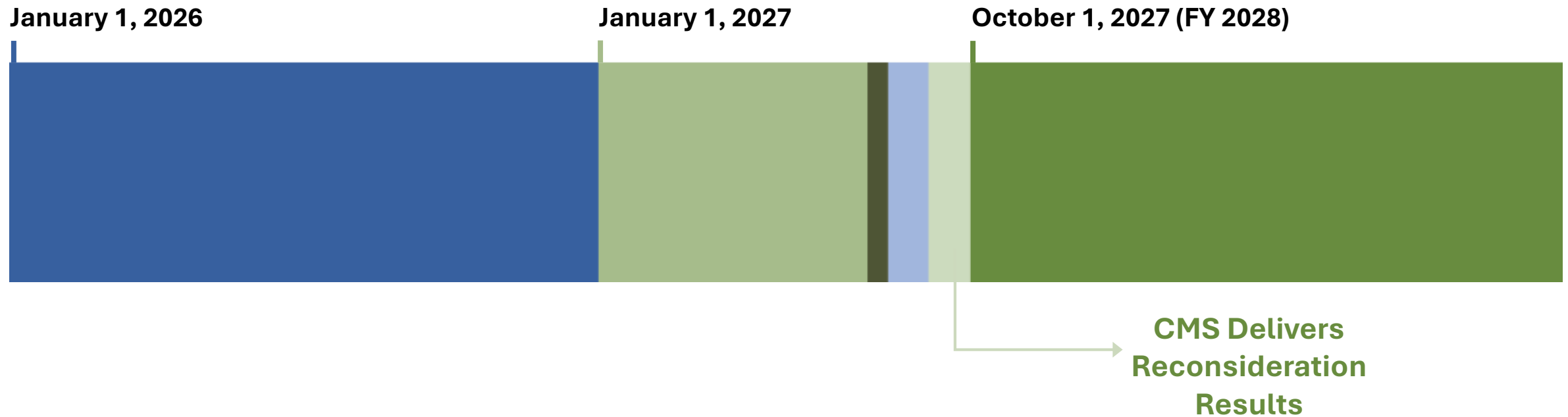
- CMS reviews submissions and makes final determinations. Non-compliance letters are sent to hospices that did not meet the HQRP requirements in July each year.

The HQRP Life Cycle: Reconsideration Request



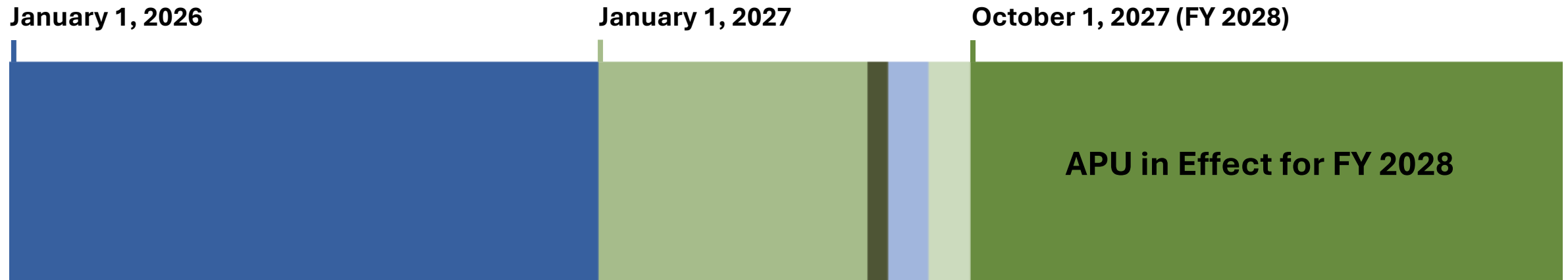
- Hospices may file for reconsideration if they receive a letter of HQRP non-compliance and believe the finding of non-compliance is in error. Hospices that want to have their circumstances reviewed by CMS must file a reconsideration request.

The HQRP Life Cycle: Reconsideration Results



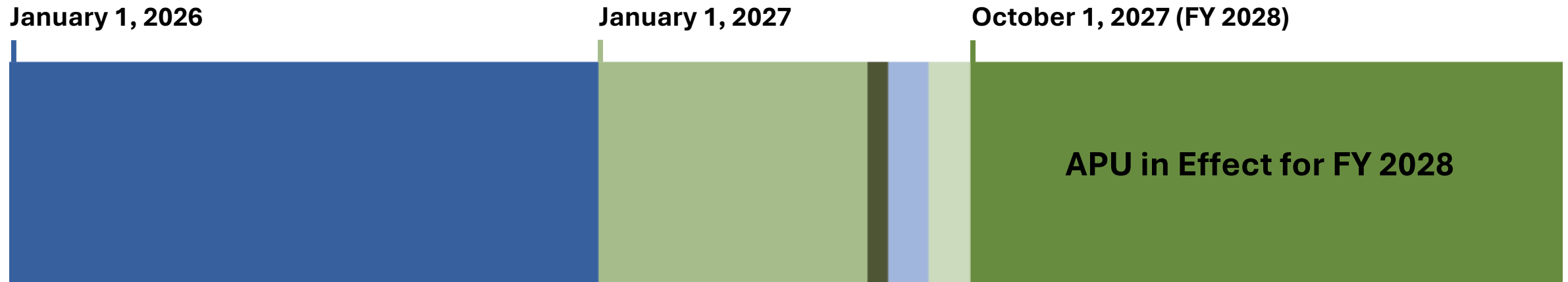
- Hospices applying for a reconsideration will be notified of the results of the request between August and September.

The HQRP Life Cycle: APU Implementation



- APU determinations go into effect with the beginning of the FY on October 1st of each year.

The HQRP Life Cycle: Full APU



- Receipt of the full APU is possible for hospices that meet the HQRP data submission requirements for HOPE and for the CAHPS Hospice Survey.

Reconsideration Process

Reconsideration Definition

- A reconsideration is a request for a review of the non-compliance decision prior to the 4-percentage point reduction in the hospice's APU that takes effect on October 1 of the applicable FY.



HQRP Non-Compliance Letters from CMS

- Providers that are non-compliant with HQRP data submission requirements receive notification from CMS via a letter of HQRP non-compliance.
 - This letter contains instructions for how to request a reconsideration.
- CMS sends the letter of HQRP non-compliance both by your Medicare Administrative Contractor (MAC) and via iQIES.
- Letters of HQRP non-compliance are typically sent to hospices in July.



Reconsideration Requests

- Hospices can request reconsideration if they receive a letter of HQRP non-compliance and believe this is an error.
- The reconsideration request period will fall between July and August.
- The date that CMS sends the letter of HQRP non-compliance is when the 30-day reconsideration request period begins.

Reconsideration
Request Period

July – August



Reconsideration Request Process

- CMS will not accept any requests submitted after the thirty (30) day deadline.
- Request submission via email **only** to HospiceQRPreconsiderations@cms.hhs.gov
- Information must include CCN, contact information, explanation, and supporting documents.
- PHI may not be submitted.
- Detailed instructions on submitting a reconsideration request are available on the [Reconsideration Requests](#) webpage.

Reconsideration Results

- CMS will base its determination solely on the documentation provided by the hospice.
- CMS will notify the hospice of its decision to any submitted reconsideration requests via the MACs and also via a letter from CMS in September prior to the FY payments that begin on October 1.
- Secondary appeals may be submitted to the Provider Reimbursement Review Board (PRRB) up to 180 days following the HQRP reconsideration notification date.

Public Notice of Compliance Determinations

- For each FY, CMS makes available to the public the list of hospices that are non-compliant for APU.
- Final lists of hospices compliant, non-compliant, and excluded from APU are posted on the CMS [Reconsideration Requests](#) webpage later in the year.
- CMS also links to the CMS Reconsideration Requests webpage with this list from the Medicare.gov website under "Medicare reporting requirements" for each hospice.

Extension and Exemption Requests

- There are two types of Extension and Exemption Requests which are both for extraordinary circumstances.
 - **Provider-initiated requests** for exemption or extension for extraordinary circumstances.
 - **CMS-initiated waivers** for exemption or extension for extraordinary circumstances (e.g., FEMA-designated disasters).
- To learn more, visit the [Extension and Exemption Requests](#) webpage.

Resources

CMS Webpages

- [Hospice Quality Reporting Program](#)
- [Hospice QRP Announcements & Spotlight](#)
- [Requirements and Best Practices](#)
- [HOPE](#)
- [CAHPS Hospice Survey](#)
- [Internet Quality Improvement & Evaluation System \(iQIES\)](#)
- [Hospice CAHPS Survey Approved Vendor List](#)

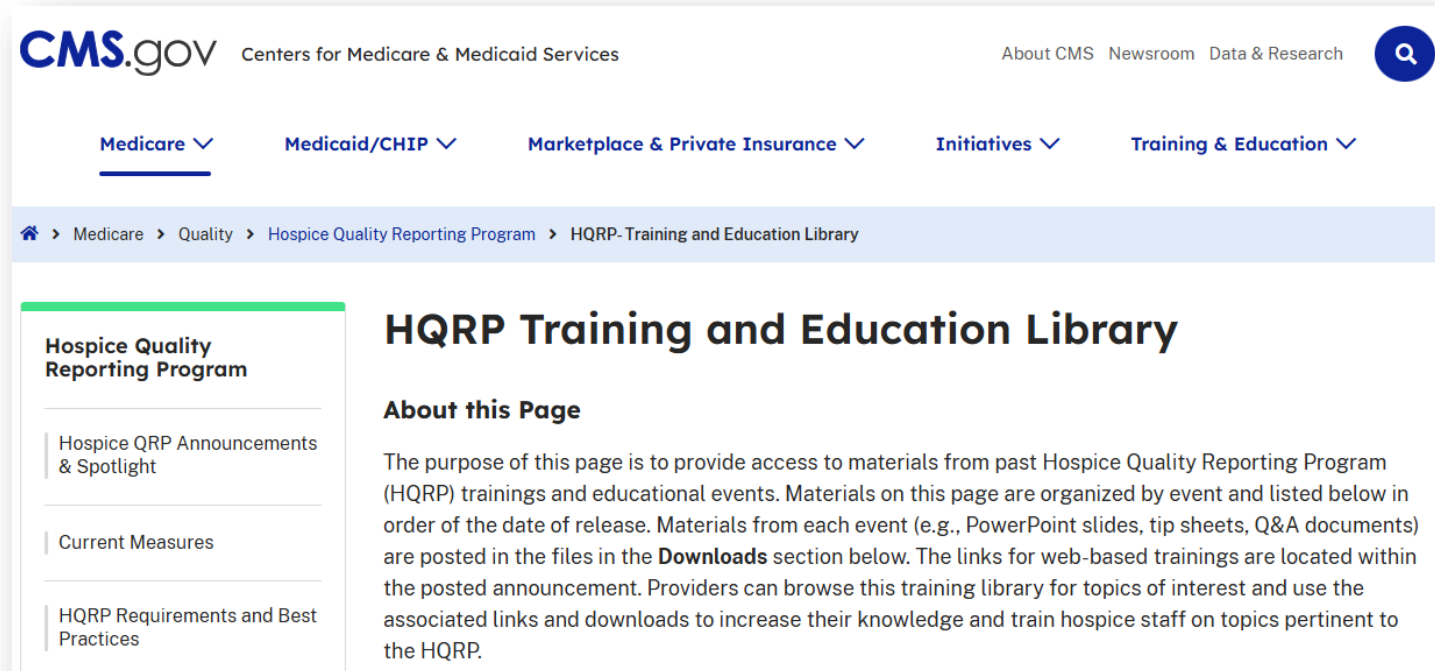


Manuals and Resources



- [CAHPS Hospice Survey Quality Assurance Guidelines - V11.0](#)
- [HOPE Guidance Manual - V1.01](#)
- [Hospice Quality Reporting Program Quality Measure Specifications User's Manual, Version 1.03](#)

Previous Trainings



- [HQRP Training and Education Library](#)

Help Desk Contacts

- Hospice Quality Help Desk: HospiceQualityQuestions@cms.hhs.gov
- Hospice Public Reporting Help Desk: HospicePRquestions@cms.hhs.gov
- Consumer Assessment of Healthcare Providers & Systems (CAHPS®) Hospice Help Desk: hospicecahpssurvey@hsag.com
 - For technical assistance, contact the CAHPS® Hospice Survey Project Team at this email hospicecahpssurvey@hsag.com or call 1-844-472-4621
 - To communicate with CMS staff about implementation issues, please email hospicesurvey@cms.hhs.gov

Help Desk Contacts (cont.)

- Requests for CMS Review of Hospice CAHPS Data:
hospicecahpssurvey@hsag.com
- iQIES Service Center:
 - Email: iqies@cms.hhs.gov
 - Phone: 1-877-201-4721
(Monday-Friday 7:00 a.m. - 7:00 p.m. Central Time)

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