

CMS Hospice Quality Reporting Program Forum September 28, 2022

Hi, everyone. Thank you for joining today's Hospice Quality Reporting Program Forum. During today's webinar CMS will provide information on the fiscal year 2023 Hospice Final Rule, recent public reporting activity, and additional HQRP updates.

At the end of the webinar today we will have a brief Q&A session. Today we will only address questions received via the questions chat box. We will not be taking phone questions. CMS will address as many questions as time allows. Please note that the slides to today's presentation will be posted on the Hospice Quality Reporting Program website in the coming weeks.

Now I will turn it over to Jermama Keys, Coordinator for the Hospice Quality Reporting Program in CMS's Center for Clinical Standards and Quality. Jermama, you may begin.

Hello, everyone. And thank you so much for joining today's Hospice Quality Reporting Program Forum. During this webinar CMS will provide information on behalf of CMS. Presenting today with me is Lauren Fuentes, CMS Lead for CAHPS®, the CAHPS Hospice Survey. And I also would like to thank Ketchum for their work supporting this webinar. Next slide.

Today we will discuss the fiscal year 2023 Hospice Wage and Payment Updates and Hospice Quality Reporting Program Requirements Final Rule, including relevant HQRP updates and public reporting announcements.

We will be discussing only the HQRP portion of the final rule. After the presentation we will leave time for questions. Next slide.

On this slide are acronyms and abbreviations that you will see during this presentation defined. Next slide.

First, I would like to discuss the fiscal year 2023 Hospice Final Rule. Next slide.

The fiscal year 2023 Hospice Wage Index and Payment Rate Update and Hospice Quality Reporting Requirements Final Rule was published on July 29th. The final rule can be accessed on the CMS web page at <https://www.govinfo.gov>, or you may go through CMS's Hospice Regulations and Notices webpage. Next slide.

The fiscal year 2023 Hospice Final Rule includes several provisions related to the HQRP. This slide and webinar highlight key topics. We will discuss these provisions in detail during this forum and encourage

you to read the whole final rule. We do not propose any new quality measures in the fiscal year 2023 final rule.

However, the rule provides updates related to the QRP and future quality measures, including the annual payment update, or APU, consumer assessment of health care providers and systems, or CAHPS, hospice outcomes and patient evaluation (HOPE), health equity, and hospice program survey and enforcement. Next slide.

Beginning with fiscal year 2024, the payment penalty for failing to meet hospice quality reporting requirements will increase from two to four percentage points. This congressionally mandated payment penalty increases to 4% and begins with the fiscal year 2024 payments and is based on calendar year 2022 quality data. Currently for fiscal year 2023 APU, based on calendar year 2021 quality data, the penalty for failure to meet the HQRP reporting requirements remains at 2%. Any payment reduction based on failure to comply with the reporting requirements apply only for the specified year. At this point I will turn the floor over to Lauren Fuentes to discuss the CAHPS Hospice Survey. Next slide.

Thank you, Jermama. The CAHPS Hospice Survey collects data on the experiences of hospice patients and caregivers. To meet HQRP requirements, hospices must collect survey data on a monthly basis and report that data to CMS on a quarterly basis through an approved survey vendor. There are no changes to the CAHPS Hospice Survey or the volume-based and newness exemptions for public reporting in the FY 2023 final rule. Next slide.

In the rule we provided information about an experiment CMS recently conducted. The goal of the experiment was to test the effects of adding a web-based mode for the CAHPS Hospice Survey and the effects of a shortened survey. CMS is reviewing the results of the experiment and any changes to the CAHPS Hospice Survey will be addressed through future rule making.

CMS also provided an update on CAHPS Star Ratings. CAHPS Star Ratings are now publicly reported on Care Compare on Medicare.gov beginning with the August 2022 refresh. CMS previously finalized a policy requiring us to display hospice CAHPS Survey Star Ratings. Hospices first saw their Star Ratings in their preview reports during the November 2021 and March 2022 preview periods. And this included data from quarter four 2018 through quarter four 2019, as well as quarter three 2020 through quarter one 2021. This concludes my updates for CAHPS Hospice Survey. Thank you and back to you, Jermama.

Thank you, Lauren. The final rule also includes an update on the development of the Hospice Outcomes and Patient Evaluation, or HOPE. The national HOPE beta testing is currently underway. This beta test includes testing of three distinct disciplinary assessments. The beta test allows CMS to obtain input from participating hospice teams about the assessment instruments and its use in the field. Beta testing supports refinement of the final draft items and assessment time points. Following the completion of testing, anticipated in spring of 2023, CMS will analyze all the final testing results and use those findings to inform the final version of the HOPE assessment and the implementation of

HOPE. CMS anticipates proposing HOPE in future rulemaking once testing and analysis are complete. Next slide.

The fiscal year 2023 Hospice Final Rule also includes information regarding a request for information (RFI) on health equity. In the fiscal year '23 Hospice Proposed Rule, CMS sought public comments through this RFI and received comments on hospices' efforts to recruit diverse staff, volunteers, and board members, barriers to accessing hospice care, hospices' collection of self-reported data, including race and ethnicity, veteran status, food insecurity and other relevant factors, and the use of qualitative data to assess health equity efforts. We thank you all for your feedback and will consider public comments as we develop health equity measure concepts for the QRP. Next slide.

In addition to the RFI on health equity, CMS sought public comment on a potential structural composite measure. CMS outlined three potential domains for this structural measure. Domain one will cover actions regarding the role of health equity and community engagement in strategic plans. Domain two will cover hospices' diversity, equity, and inclusion efforts including culturally and linguistically appropriate services, or CLAS, training for board members, staff, and volunteers. And domain three will cover activities related to organizational inclusion, initiatives, and hospice capacity to promote health equity. CMS will take responses and suggestions from your public comments into consideration when further refining the measure concept. Next slide.

The rule also includes an update on the Hospice Program Survey and Enforcement. I will be presenting this portion of the rule on behalf of my colleagues in the Survey and Operations Group. Section 407 of the Consolidated Appropriations Act, or CAA of 2021, established several new hospice program survey requirements such as: public reporting of compliant survey data and enforcement actions, accrediting organizations use the same survey deficiency reports as state-agencies to report their survey findings, comprehensive training and testing for surveyors, including review of written plans of care, and establishment of a hospice hotline. Next slide.

CAA 2021 also provided the creation of a Special Focus Program, or SFP, for poor-performing hospices. Following the publication of the calendar year 2022 HS PPS Final Rule, Abt Associates, under contract with CMS, established a TEP in in calendar year 2022. CMS plans to consider the TEP findings to develop the Hospice Special Focus Program and CMS expects to continue to include the SFP proposal in the fiscal year 2023 Hospice Wage Index and Payment Rate Update Proposed Rule. Next slide. Next, I would like to discuss updates to the HQR. Next slide.

The HQR's hospice visits in the last days of life, or HVL, measure was endorsed by the National Quality Forum. The National Quality Forum is a multi-stakeholder independent group that provides input to CMS on proposed quality measures. It endorsed HVL with NQF number 3645 in July of this year. Next slide.

Finally, I would like to discuss public reporting. Next slide.

Public reporting for the HQR occurs on the Care Compare website. Next slide.

Starting with last month's Care Compare refresh, CMS began reporting two claims-based quality measures – HVLDL and HCI, or the Hospice Care Index. Care Compare also includes CAHPS Star Ratings. Next slide.

Additionally, Provider Preview Reports for the upcoming November 2022 refresh were released on August 19th. The reports include a claim count, a new variable showing how many claims were used to calculate the claims-based measures for your hospice. And these reports are available for 60 days after release in CASPER. Next slide.

There are a few new resources for public reporting. I would like to highlight the Third Edition Public Reporting tip sheet and two fact sheets. One focusing on CASPER QM reports and the other focusing on review and correct reports. These tip sheets are available on the HQR requirements and best practice webpage. Next slide.

This slide and the next slide will contain several helpful resources. Next slide.

There are additional resources here and we'd like to point out the second bullet. For more detailed information about the fiscal year '23 or any hospice rule, please visit this link for the official CMS policy related to the QRP. Next slide.

Thank you so very much for attending this HQR forum. I will now turn the floor back to Ketchum. Okay, thank you and thank you to both you and Lauren for presenting today. We will now move on to the Q&A portion of today's webinar. Again, as a reminder we are not addressing live audio questions, so you must submit your question using the chat feature.

For our first question. Can CMS provide more details about the SFP? Can you hear me okay, this is Thomas. I can Thomas, thank you. Yeah, so thanks for the question. So, at this time CMS is, as mentioned earlier by Jermama, contracted with Abt Associates to facilitate the TEP. That TEP, as stated will happen, October – November of this year. This TEP certainly will consist of members that reflect national associations, state associations, for-profit, not-for-profit consumer perspectives. And so, we do, at this point, expect to consider the TEP feedback as we develop the Special Focus Program. Okay. Thank you for the response.

Our next question, thank you for the overview of the fiscal year 2023 Hospice Final Rule. Where can I find the fiscal year 2023 Hospice Final Rule that you discussed during this presentation? I can take that. If you refresh the second bullet on slide 23, it gives you the hyperlink to the Hospice Regulation and Notices web page, or you could put "hospice regulations" in the search engine and it's typically the first result in your search. The slides will be made available after the forum. Okay. Thank you.

Our next question. When will HOPE be implemented? We are aware of the strong interest in HOPE implementation and we appreciate this level of interest. However, before HOPE information can actually occur, HOPE will be proposed in future rulemaking and the implementation period will follow. Because we're currently in beta testing, we are going to provide more information as CMS is able. But the vehicles to stay informed include the quarterly updates, open door forums, HQRP forums such as this one, and future rulemaking. CMS will continue to use those communication channels to inform the public on HOPE testing and implementation. Thank you.

Okay. Our next question. When will CMS release the HE TEP members? So, the health equity TEP members, or the technical expert panel members, will be included in the published TEP report that's going to be posted on the CMS website and you should expect that sometime in 2023. Okay, thank you.

Our next question. I was just hired by a hospice and fairly new in my position. I'm working on quality and compliance, there is a lot of information, where do you recommend that I start for HQRP? So, first congratulations on your new position. If you go to the "Requirements and Best Practices" webpage, which is going to be identified in the left hand navigation bar of the HQRP webpage, there are several important Getting Started documents available on that page. And in addition to that page, you can also access the "Training and Education" webpage. There's going to be a hyperlink that's available on that same left hand navigation bar. The site is going to be a good resource and there are a number of resources that are available. And that training, you can actually access that training anytime day or night to meet whatever your training needs might be. So, ultimately it is worth going through each HQRP page periodically because it is updated regularly. And your spotlight announcements are going to, you know, alert you to any of the things that might be new coming from CMS as well. Thank you.

Okay. Our next question. The 2023 rulemaking included a request for information on health equity and discussed a structural measure, but it's not clear what is happening next. Can you talk about when a health equity measure is expected to be implemented? So, thank you for your question. We are convening a technical expert panel or TEP. And we'll be considering the health equity TEP discussions in our health equity measure development for both Hospice Quality Reporting and the Home-Health Quality Reporting programs. So, there is still work to be done before I can really speak to when health equity measure will be implemented but we are in the very early stage of measurement development.

Alright. Our next question. How often will the CAHPS Star Ratings be updated on Care Compare? Hi, this is Lauren, I can take that one. So, the CAHPS Star Ratings, CMS plans to update the CAHPS Hospice Survey Star Ratings every other quarter, so every six months. And the next update for CAHPS Star Ratings will occur with the February 2023 refresh. Thank you. Okay, thanks, Lauren.

Our next question. What happens after HOPE testing? Will it be implemented right away? Is someone available to answer that or should we move on to the next question? Hi, this is Jen Riggs, I can answer that. The question is, will HOPE be implemented right away after testing, and the answer is no. First, all of the information, the results of testing, will have to be analyzed. And then CMS will consider the

results in the process of developing the final version of HOPE. And then HOPE would be proposed in some future rulemaking prior to any implementation. Okay, thank you.

Our next question. Will hospice Care Compare still have the HIS Comprehensive Assessment measure recorded? I can take this one. The answer is yes. The HIS Comprehensive Assessment measure is publicly reported and a valuable measure in the HQR. What's new are the actual two claims-based measures and the CAHPS Star Ratings and they were released in August of 2022. Okay.

Our next question. Does CMS have HOPE testing results to share? Thank you so much for asking. At this time, we do not have testing results to share. CMS will share results of HOPE testing when all analysis are completed and information is prepared for public dissemination and we anticipate that happening around sometime in 2022, 2023 I'm sorry. Okay.

Our next question. In reference to health equity, how are Social Determinants of Health data expected to be collected? I'm sorry, Social Determinants of Health. Oh, that's fine. Abt Associates under contract with CMS expects to be able to solicit some feedback from the health equity HQR and HHQR TEP related to this matter. CMS is considering appropriate data and data sources based on the public comment, based on TEP input, and additional considerations. As Sue mentioned we are still in the very early stages of development. Okay. Thank you.

Our next question. How much time will providers have to prepare for HOPE implementation? Thank you for wanting to be prepared for HOPE and its implementation. I appreciate everyone being so proactive. CMS is considering the time it could take for providers and vendors to be prepared for HOPE implementation. We've heard from providers and vendors about the time that they actually might need and at this time I can't provide anything specific. But we intend to allow for sufficient time to prepare for HOPE prior to its actual effective date. Okay.

Our next question. Will a Star Rating be publicly reported for all eight of the CAHPS Hospice Survey measures? Hi, this is Lauren. No, only the summary Star Rating, which is known as the Family Caregiver Survey Rating, will be publicly reported on Care Compare. CMS does calculate a Star Rating for each of the eight CAHPS Hospice Survey Quality measures. And this information is provided to hospices in their confidential Provider Preview Reports. The Family Caregiver Survey Rating is a weighted average of the Star Ratings that is calculated for each of the quality measures. Thank you.

Our next question. What is HOPE testing for? So, CMS and Abt Associates are conducting HOPE data collection and testing at this time. So, HOPE testing really provides like field tests of successive drafts of HOPE by hospice clinicians to establish and confirm some sort of a reliability and validity and feasibility of HOPE questions. So, ultimately the testing supports the development of the final version of HOPE to be proposed in future rulemaking. Okay.

Our next question. How is CMS incorporating stakeholder input into the health equity measure, into the health equity measure development process? So, in addition to the public comment from

rulemaking, that we take into consideration for health equity measurement development, Abt Associates will actually be convening a health equity HQRP and HHQRP technical expert panel or TEP in the fall – well, fall of 2022. So, CMS anticipates convening consumer and caregiver focus groups in 2023. We're always open to input, and we try to provide opportunities via to be those sub-regulatory processes and they are described on the HQRP webpage under the Provider and Stakeholder Engagement path. So, things like the ODF (open door forum), things like listserv, quarterly updates provide those updates in reference to stakeholder feedback and input. And CMS is also providing information in future rulemaking as well.

Okay. We've got another health equity question here. What kind of resources or support will be available to providers in implementing health equity initiative, like the ENI hiring and recruitment efforts and reporting? So, at this time unfortunately we can't address resources because we're still in the very early stages of development. Okay, thank you for that.

Our next question. What if I have concerns about my Provider Preview Report? What do I do or who should I contact? Thank you for asking how to inform CMS of your concerns with the PPR or the Provider Preview Report. I encourage everyone to go to the HQRP webpage and look on that left navigation bar and there's a page called "Public Reporting Provider Preview Report and Request for CMS Review of Data." There's information there about how long the preview period is and how to actually request CMS's review of your data. So, if you're not sure how to access your report, you can download the instructions on that same page in the Download section. And then if you still have issues, just contact the help desk at hospicequalityquestions@cms.hhs.gov. Okay, thank you and we've chatted that email address out to attendees so that it's in the chat for you to easily copy and paste.

Our next question. I see the Hospice Care Index score on Care Compare, but I thought it is made up of ten indicators. I don't see the indicators on Care Compare – is that information available? So, you are correct. The score that you see on Care Compare is the overall score. The indicators however are publicly available in the provider data catalog. So, at the bottom of the Care Compare webpage there should be a hyperlink with the phrase, "visit the data catalog on cms.gov." If you click on that link, you'll be able to download all the data sets. So, for example, if you go there now the data sets should have, like Hospice Provider Underscore August 2022. And that file is for download, and it will include all your indicators.

Okay, thank you, a couple more questions here. When will HOPE testing be completed? And will there be training before HOPE is implemented? Of course. CMS, well we anticipate that HOPE testing will be completed by spring of 2023. So, CMS and their contractor will conduct national provider training prior to implementation of any new or any advised quality program instruments. So, yes there will be definite training before HOPE is ever implemented. Okay.

Our next question. How many days will the Provider Preview Report be available? Additionally, how do I log in to CASPER? So, we note it on the HQRP webpage, but once released providers will have 30 days during which they can review the quality measure results. And even though the actual preview period is 30 days, the reports will continue to be available for another 30 days, which is a total of 60 days.

CMS always encourages providers to download and save their hospice Provider Preview Reports for future reference, because after the 60-day period they will no longer be available in CASPER. For information on how to actually receive or retrieve your hospice Provider Preview Report, you can probably put this link in the chat. But it's going to be the webpage for Hospice Quality Reporting in the Download section and it's going to say "Hospice Provider Preview Report Access Instructions" – it's going to be a PDF. So, you'll find the document and any additional information on the Public Reporting pages of that HQRP website that we referenced earlier. And we have indeed added the link, we've chatted it out to all of today's attendees.

Our next question. For which hospices' will CAHPS Star Ratings be calculated and publicly reported? Hi, this is Lauren again. So, a hospice must have at least 75 respondents or completed questionnaires in the eight quarter Star Rating reporting period to receive a Star Rating for that reporting period. So, Star Ratings will not be calculated or publicly reported for hospices with fewer than 75 respondents. Thank you.

Okay, thank you. Our next question. This person would like to know if they heard correctly, the beta test phase of HOPE will be completed in spring 2023? Can you please confirm that, sorry. Yes, that's correct.

Okay, thank you. Can you please discuss what is the next phase of the HOPE development, or what, sorry, what is the next phase of HOPE development after the beta test? Oh, go ahead. That's okay. After beta testing is the analysis phase. And once we analyze the data that we receive on the beta test and alphabetize the overall testing, then we will start to finalize the version of HOPE that would be proposed in future rulemaking.

Okay. Our next question. Why do some agencies not have Star Ratings yet? Hi, this is Lauren. So, as I mentioned before, the Star Ratings will only be calculated for hospices that have at least 75 respondents or completed questionnaires. So, we are not going to calculate a summary Star Rating based on fewer than 75 respondents, it just does not have the statistical reliability to distinguish between a hospices' performances. Thank you. We have a couple more minutes here as a reminder if you would like to ask a question, please continue to submit them through the chat box.

Our next question. Will the February 2023 Five Star CAHPS rating include changes in the Cut Point score rating? Hi, this is Lauren. Yes. So, the CAHPS Hospice Survey Star Ratings including the cut points between the stars will be recalculated every other quarter. And again, this is to allow for the stable estimation of the cut points, that's why we're doing the Star Ratings every other quarter, which is different than the quality measures, which will be updated every quarter. And that will, you know, that refresh will occur with the February 2023 refresh. Thank you.

Our next question. Please clarify annual or semiannual for Star Ratings. So, I guess, is that question for when the Star Ratings are updated? It's, yeah, it'll be every other quarter, or every six months. Okay, thanks, Lauren. And I'm sorry I don't have the name of who submitted that question at the moment,

but if that does not address your question, please feel free to clarify for us and we'll try to get it addressed properly.

Our next question. Are you able to share how many questions will be eliminated in the shortened version of the CAHPS survey? Hi, at this time, no we have not made decisions, we are looking at the results. But, you know, of course we will share that information through our usual communication channels, you know, through the proposed rule as soon as decisions are made as far as the survey, changes to the survey. Okay. Thank you, Lauren.

Our next question. What was the time frame for the 75 respondents on Star Rating? So that would be the reporting period, which would be eight quarters. Okay and I think we have a follow-up question here.

Is it 75 respondents within six months to have Star Ratings reported? Eight quarters. So, six months yes. Okay, thank you.

Our next question is still on the same topic. Is there considerations for less than 75 survey returns for Star Ratings? Some smaller hospices are hindered by that as we would need a higher survey return. Right, not at this time, I mean we don't, you know, it's important that these Star Ratings are statistically reliable, so that's why we use 75 as our cutoff. Okay. Thank you.

We have just about five minutes left, again there are currently no more questions in the queue. If you do have a question, we'll give it another minute here real quick but please again use the chat box to submit your question. We will give it another minute. Okay, we got one more here. Still, I think Lauren it's for you. Will there be any annual payment penalties for hospices who do not meet the 75-survey threshold? No, at this time the hospice, the Star Ratings are not used in the determination of hospice compliance for the annual payment of fee requirements. Okay, thank you.

Our next question. Are the Star Ratings per provider number? They're for the hospice, so I think that would be your CCN. Okay, thank you.

Our next question. If we notice that some of the information on the Care Compare site is inaccurate, how do we request a correction? I'm sorry. You can actually send your questions in to the Public Reporting Help Desk. And they should be able to help you, walk you through updating your information on how it's displayed on Care Compare. Okay, thank you.

I think this question is for Lauren. This person would like some clarification – did you say that the time frame to receive 75 responses was eight quarters or six months? I think there's some confusion around that. Right, I know it's, so, eight quarters is the, it's the reporting period for calculating the hospices' Star Ratings based on the data that's collected. They will be updated every other quarter or every six

months. I hope that clarifies. Thanks, Lauren. And if that, if you still have, the person who asked that question still needs clarification please feel free to send it through the chat box.

Our next question, there's just a couple more minutes here. When should we anticipate any change to the CAHPS survey based on the experiments mentioned in the fiscal year 2023 final rule? So, at this time I don't have a timeline that I can share with you. I mean, of course we will keep you updated on any, you know, decisions as we move forward, but at this time I don't have a time frame to share with you. But of course, you know, we will have adequate time for you to prepare for any changes for the survey vendors to prepare. Okay, thanks, Lauren.

At this time, we have no additional questions in the queue, so I think we can move to the next slide. And this completes today's session, we thank you all for joining us today. We will share the slides and recording from the forum today, or I'm sorry we will share the slides and recording from today's forum in the coming weeks. They will also, as we mentioned, be posted on the HQRP webpage.

If you do have additional questions or comments, please email hospicequalityquestions@cms.hhs.gov. It's also in the chat. Again, that's hospicequalityquestions@cms.hhs.gov. I hope you all have a great afternoon and thank you again for joining us.