

# Compliance Tip Sheet

National Hospice and Palliative Care Organizations  
www.nhpco.org/legislation



## CMS FY 2010 Top Ten Hospice Survey Deficiencies (Compliance Tip Sheet)

### Introduction

The Centers for Medicare and Medicaid Services (CMS) identifies the top ten most frequent survey deficiencies cited during Medicare hospice recertification surveys annually. This compliance tip sheet will:

- ✓ List the survey deficiency by Medicare hospice Condition of Participation\* (CoP) and by Hospice Program Interpretive Guidance\*\* L-Tag from federal Fiscal Year 2000.
- ✓ Provide an example of the deficiency based on actual CMS survey deficiency data.
- ✓ Provide suggestions from a clinical, documentation, and administrative perspective for compliance.
- ✓ List the standard and practice example from the NHPCO [Standards of Practice for Hospice Programs \(2012\)](#) related to the cited deficiency.

\* The [Medicare hospice Conditions of Participation \(2008\)](#) contain the federal regulations that govern all Medicare-certified hospice programs.

\*\* The Hospice Program Appendix M: [Interpretive Guidelines \(2000\)](#) are guidance to personnel conducting surveys of hospices, and serve to clarify and/or explain the intent of the regulations. All surveyors are required to use them in assessing compliance with federal requirements. The purpose of the protocols and guidelines is to direct the surveyor's attention to avenues of investigation in preparation for the survey, conducting the survey and evaluating the survey findings.

### CMS Top Ten Hospice Survey Deficiencies

The top ten hospice survey deficiencies listed in order of the most frequently cited are:

1. **Medicare hospice CoP: §418.56(b) Standard: Plan of care.**  
All hospice care and services furnished to patients and their families must follow an individualized written plan of care established by the hospice interdisciplinary group in collaboration with the attending physician (if any), the patient or representative, and the primary caregiver in accordance with the patient's needs if any of them so desire.  
**Interpretive Guidelines L-Tag: L1411**
2. **Medicare hospice CoP: §418.56(c) Standard: Content of the plan of care.**  
The hospice must develop an individualized written plan of care for each patient. The plan of care must reflect patient and family goals and interventions based on the problems identified in the

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**Olivia Swedberg Yinger**

A red circular graphic with a gradient, appearing as a stylized arrow or a partial circle, located to the right of the author's name.

## **Nhpco Compliance Tip Sheet:**

The Changing Face of Health Care Social Work, Third Edition Sophia F. Dziegielewski, 2013-05-03 This third edition of a best selling social work text reflects the dramatic changes that have taken place in our health care environment since the second edition was published in 2004 and will likely continue to take place. It is a practical guide for social workers who must navigate our complex health care environment and accept new challenges while adapting to continual change. The book encompasses many facets of professional health care social work within the U S health care system across key health care settings and with numerous different patient populations. The book is also a call to action for social workers who today must not only be therapeutically effective but must be professionally competitive with other health care providers that claim similar treatment strategies and techniques. Permeating the third edition is a strong emphasis on the importance of developing best practices that are evidence based, supportive and ethically accountable while remaining time limited and cost effective. Each chapter contains a Glossary, Questions for Further Study and a list of relevant websites. At the end of each chapter a Future Directions section helps social workers understand what to expect and how to prepare for changes in order to practice successfully. This third edition additionally encompasses updated professional profiles for diverse arenas of practice and is accompanied by an Instructor's Manual that provides a test bank, activities designed to enhance learning and a sample syllabus. Completely new or updated sections examine Mental health parity, Changes in billing, Evidence based practice, strategy, Electronic record keeping and other advances in health technology. Information related to the DSM 5, Protecting yourself legally in your documentation, Protecting the privacy of the client, Supervision in the health care setting, The importance of teamwork and collaboration, Social work in the military and VA settings, Safety planning. *Music*

*Therapy: Research and Evidence-Based Practice* Olivia Swedberg Yinger, 2017-08-27 Get a quick expert overview of the clinical and evidence based use of music interventions in health care. This practical resource compiled by Dr. Olivia Swedberg Yinger provides a concise, useful overview of the profession of music therapy including a description of each of the research support practices that occur in the settings where music therapists most commonly work. Features a wealth of information on music therapy and its relevance in education, settings, mental health, treatment, medical treatment and rehabilitation, hospice and palliative care, gerontology and wellness. Includes a chapter on current trends and future directions in music therapy. Consolidates today's available information and guidance in this timely area into one convenient resource. **Hospice and**

**Palliative Care Handbook, Fourth Edition: Quality, Compliance, and Reimbursement** Tina M. Marrelli, 2023-06-23 This book is a perfect blend of compassion and competence that addresses the core values of care, the interdisciplinary team, self care of staff and the needs of an aging society. Betty Ferrell PhD, FAAN, FPCN, CHPN, Professor and Director, Nursing Research, City of Hope Medical Center, Principal Investigator, End of Life Nursing Education Consortium. A must read for all hospice providers. It is a comprehensive overview of the core elements required to practice effectively, compliantly, safely and

compassionately An indispensable addition to all hospice libraries Kim Corral MA Ed BSN RN COS C Director of Corporate Compliance Quality and Education Bridge Home Health and Hospice I have utilized Tina Marrelli's home health and hospice handbooks to support training new clinical staff and students for decades and consider these resources to be the gold standard Kimberly Skehan MSN RN HCS D COS C Vice President of Accreditation Community Health Accreditation Partner Hospice Palliative Care Handbook Fourth Edition offers updated coverage of all aspects of hospice and palliative care for the entire healthcare team who provide important care while meeting difficult multilevel regulations This edition includes examples and strategies covering key topics related to standards guidelines goals and effective care planning

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**ABOUT THE AUTHORS** TINA M MARRELLI MSN MA RN FAAN is the author of over 10 award winning books She is an international consultant specializing in home care and hospice and is the President of Marrelli Associates Inc a publishing and consulting firm working in healthcare and technology for over 25 years JENNIFER KENNEDY EdD BSN RN CHC is the Vice President for Quality Standards and Compliance at Community Health Accreditation Partner CHAP and is a nationally recognized hospice expert She has more than 35 years of experience as a leader and nurse in diverse healthcare settings and has worked in hospice and palliative care for more than 25 years

**Death, Dying, and Bereavement in a Changing World** Alan Kemp, 2018-11-02 In this introductory text on thanatology Alan Kemp continues to take on the central question of mortality the centrality of death coupled with the denial of death in the human experience Drawing from the work of Ernest Becker *Death Dying and Bereavement in a Changing World* provides a multidisciplinary and multidimensional approach to the study of death putting extra emphasis on the how death takes place in a rapidly changing world This new second edition includes the most up to date research data and figures related to death and dying New research on the alternative death movement natural disaster related deaths and cannabis as a form of treatment for life threatening illnesses and updated research on physician assisted suicide as well as on grief as it relates to the DSM 5 have been added

*Hospital-Based Palliative Medicine* Steven Z. Pantilat, Wendy Anderson, Matthew Gonzales, Eric Widera, 2014-12-01 The first comprehensive clinically focused guide to help hospitalists and other hospital based clinicians provide quality palliative care in the inpatient setting Written for practicing clinicians by a team of experts in the field of palliative care and hospital care *Hospital Based Palliative Medicine A Practical Evidence Based Approach* offers Comprehensive content over three domains of inpatient palliative care symptom management communication and decision

making and practical skills Detailed information on assessment and management of symptoms commonly experienced by seriously ill patients Advise on the use of specific communication techniques to address sensitive topics such as prognosis goals of care code status advance care planning and family meetings in a patient and family centered manner Targeted content for specific scenarios including palliative care emergencies care at the end of life and an overview of post hospital palliative care options Self care strategies for resilience and clinician wellness which can be used to help maintain an empathic engaged workforce and high quality patient care A consistent chapter format with highlighted clinical pearls and pitfalls ensuring the material is easily accessible to the busy hospitalist and associated hospital staff This title will be of use to all hospital clinicians who care for seriously ill patients and their families Specialist trained palliative care clinicians will also find this title useful by outlining a framework for the delivery of palliative care by the patient s front line hospital providers Also available in the in the Hospital Based Medicine Current Concepts series Inpatient Anticoagulation Margaret C Fang Editor 2011 Hospital Images A Clinical Atlas Paul B Aronowitz Editor 2012 Becoming a Consummate Clinician What Every Student House Officer and Hospital Practitioner Needs to Know Ary L Goldberger and Zachary D Goldberger Editors 2012 Perioperative Medicine Medical Consultation and Co Management Amir K Jaffer and Paul J Grant Editors 2012 Clinical Care Conundrums Challenging Diagnoses in Hospital Medicine James C Pile Thomas E Baudendistel and Brian J Harte Editors 2013 Inpatient Cardiovascular Medicine Brahmajee K Nallamothu and Timir S Baman Editors 2013

**Caring for Veterans and Their Families: A Guide for Nurses and Healthcare Professionals** Rita F D'Aoust,Alicia Gill Rossiter,2021-11-08 Of the approximately 20 million veterans of the U S armed forces less than half utilize the Veteran s Health Administration health care system That means the majority of veterans are receiving care from nurses and healthcare professionals who may not be trained in treating or caring for patients who have served in the military This unique book guides nurses and healthcare professionals through the specific set of needs veterans can present including but not limited to PTSD Topics covered include defining military culture and how to apply that knowledge to provide informed treatment transitioning from service to civilian life and the many challenges expected during re adjustment and re entry recognizing and treating substance use disorders identifying suicidal behaviors and warning signs long term care for elderly veterans and many more topics unique to the healthcare of veterans Hospice and Palliative Care Handbook T. M. Marrelli,2005 This easy to use handbook is the only one of its kind to offer concise focused coverage of all hospice related conditions Key topics include professional standards and guidelines bereavement services considerations outcomes and goals quality control and tips for obtaining reimbursement Couverture

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