

Hospice

# Bringing HOPE to Your Hospice

Angela Huff, RN



## **HOPE Finalized**

### 2025 Final Rule



Federal Register/Vol. 89, No. 151/Tuesday, August 6, 2024/Rules and Regulations

Centers for Medicare & Medicaid Services

42 CER Port 418 [CMS-1810-F]

Medicare Program; FY 2025 Hospice Wage Index and Payment Rate Update, Hospice Conditions of Participation Updates, and Hospice Quality Reporting Program Requirements

AGENCY: Centers for Medicare & Medicaid Services (CMS), Department of Health and Human Services (HHS).

most recent Office of Management and Budget statistical area delineations, which will impact the hospice wage index. This rule clarifies current policy related to the "election statement" and the "notice of election", as well as adds of Participation (CoPs). This rule
finalizes changes to the Hospice Quality
Reporting Program. Finally, this rule
Healthcare Providers and Systems
Healthcare Providers and Systems
Healthcare Providers and Systems regarding potential implementation of a separate payment mechanism to account for high intensity palliative care sortions account of the major Provisions Section III.A.1 of this final rule undates the hosnice wave index and

DATES: These regulations are effective on October 1, 2024.

FOR FURTHER INFORMATION CONTACT: For general questions about hospice payment policy, send your inquiry via email to: hospicepolicy@cms.hhs.gov. For questions regarding the CAHPS® Hospice Survey, contact Lauren Fuentes at (410) 786-2290.

at (410) 786–2290.

For questions regarding the hospice conditions of participation (CoPs), contact Mary Rossi-Coajou at (410) 786–

quality reporting program, contact Jermama Keys at (410) 786–7778.

L Executive Summary

A. Purpose

This final rule updates the hospice rais man rule updates the hospice wage index, payment rates, and cap amount for Fiscal Year (FY) 2025 as required under section 1814(i) of the Social Security Act (the Act). This rule

also finalizes the adoption of the most Budget (OMB) statistical area delineations based on data collected during the 2020 Decennial Census. during the 2020 Deceminal Census, which will result in changes to the hospice wage index. In addition, this rule finalizes the reorganization of the regulations to clarify current policy related to the "election statement" and the "notice of election (NOEs)," and adds clarifying language regarding who can certify terminal illness and admit patients to hospice. This rule also summarizes comments solicited regarding a potential policy to account for the increased hospice costs of providing high intensity palliative care services.

trajectory for further development of this instrument; and provides updates on Health Equity, future quality measures (QMs), and public reporting requirements. We also acknowledge the "notice of election", as well as adds carifying language regarding hospice certification and includes a technical regulation text change to the Conditions of Participation (CoPs). This rule (Hospice CAHPS) Survey.

Section III.A.1 of this man rule updates the hospice wage index and makes the application of the updated wage data budget neutral for all four levels of hospice care. Section III.A.2 of this final rule adopts

the new OMB labor market delineations from the July 21, 2023, OMB Bulletin from the July 21, 2023, OMB Suited in No. 23–01 based on data collected from the 2020 Decemnial Census. Section III.A.3 of this final rule includes the final FY 2025 hospice payment update percentage of 2.9 percent. Section III.A.4 of this final rule

includes updates to hospice payment

rates. Section III.A.5 of this final rule includes an update to the hospice cap amount for FY 2025 by the hospice payment update percentage of 2.9 ercent. In section III.B of this final rule, we

make clarifying changes to the hospice Conditions of Participation (CoPs) and

clarifying text changes that align payment regulations and CoPs regarding who may certify terminal illness and determine admission to hospice care. This section also finalizes technical regulations text changes in the Medical Director CoP at § 418.102. In addition, we are making a technical correction in the personnel requirements at § 418.114(b)(9), where we inadvertently used the term "marriage and family

In section III.C of this final rule, we include a summary of comments received on a potential policy to account for higher hospice costs involved in the provision of high intensity palliative care treatments. Finally, in section III.D of this final ACTION: Final rule.

Additionally, this rule finalizes the flespice Quality Reporting Properties of the provision of high. 
FLEW measures collected through a new collection instrument, the formal reporting of high fleet of the provision of high. 
Flesh was a compared to the provision of high fleet of the provision

> C. Summary of Impacts The overall economic impact of this ation in increased payments to hospices in FY

A. Hospice Care

Hospice care is a comprehen Hospice care is a comprehensive, holistic approach to treatment that recognizes the impending death of a terminally ill individual and warrants a change in the focus from curative care to palliative care for relief of pain and for symptom management. Medicare regulations define "palliative care" as nationt and family-contored care that optimizes quality of life by anticipating preventing, and treating suffering. Palliative care throughout the continuum of illness involves addressing physical, intellectual, emotional, social, and spiritual needs and to facilitate patient autonomy, access to information, and choice (42 CFR 418.3). Palliative care is at the core of hospice philosophy and care practices and is a critical component of the Medicare hospice benefit.

terminally ill individuals continue life the home environment. A hospice uses an interdisciplinary approach to delive make carrying changes to the hospice
Conditions of Participation (Col's) and
adopt clarifying regulations text, with
no change to current policy. This is
includes reorganizing the regulations to
clearly identify the distinction between
the condition of the cond

### Federal Register

dated August 6, 2024





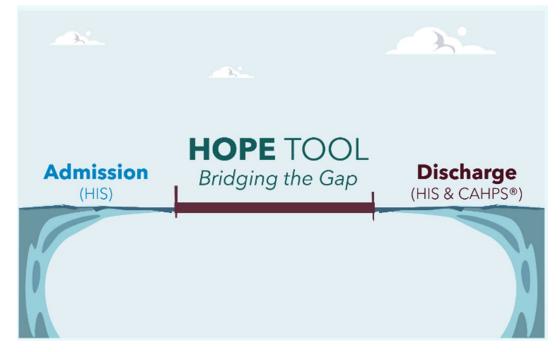
### **HOPE Instrument**

## What is it?

HOPE stands for Hospice Outcomes and Patient

Evaluation (HOPE)

- New standardized tool
- Developed to replace the HIS
- Will provide assessment-based quality data to the HQRP





## HOPE is On it's Way – but when

- To be implemented October 1, 2025 (FY 2026)
  - -Data collection on or after October 1, 2025
- Must be collected by an in-person RN visit no telehealth
- Multiple time points
  - -Admission
  - -Hope Update Visits (HUV)
    - Defined time points
    - Dependent on length of stay
  - -Discharge



## **HOPE Use Current and new measures**

- Collect data for the HQRP
- •Replaces HIS as data source for Comprehensive
  - Assessment at Admission (CBE 3235)

- -2 new measures
- -Anticipated public reporting in FY 2028
- Analysis of 4 full quarters 2026 data in 2027 will determine decision of public reporting





## **HOPE Use Future**

- Future testing measures for the HQRP
  - -May be hybrid measures



-Further development of instrument

Support survey and certification processes

May inform future payment changes





## **Details**

- Replace this HIS last HIS collected will be on September 30, 2025
- Includes new or expanded items in several domains
  - Sociodemographic
  - Living Arrangements
  - Availability of Assistance
  - Diagnoses
  - Symptom Impact Assessment
  - Imminent Death
  - Skin
- Submission required of the HOPE data
- 90% reporting requirement
  - 4% Payment Penalty



NOTE: Patients on service at the start of HOPE data collection should not be discharged and readmitted using the HOPE tool.



## Development

- Information gathering
- Stakeholder engagement
- Technical Expert Panel

Provider and Stakeholder Engagement | CMS

Tested



176 pages

-Cognitive, pilot, alpha testing and national beta field testing completed October of 2022

Hospice Quality Reporting Program (cms.gov)



## **Hope Guidance Manual**

Hospice Outcomes and Patient Evaluation (HOPE)
Guidance Manual - v1.0 DRAFT



Centers for Medicare and Medicaid Services Hospice Quality Reporting Program

https://www.cms.gov/files/document/draft-hope-guidance-manualv100.pdf



## **HOPE** by sections





## **Collection Timepoints**

Admission

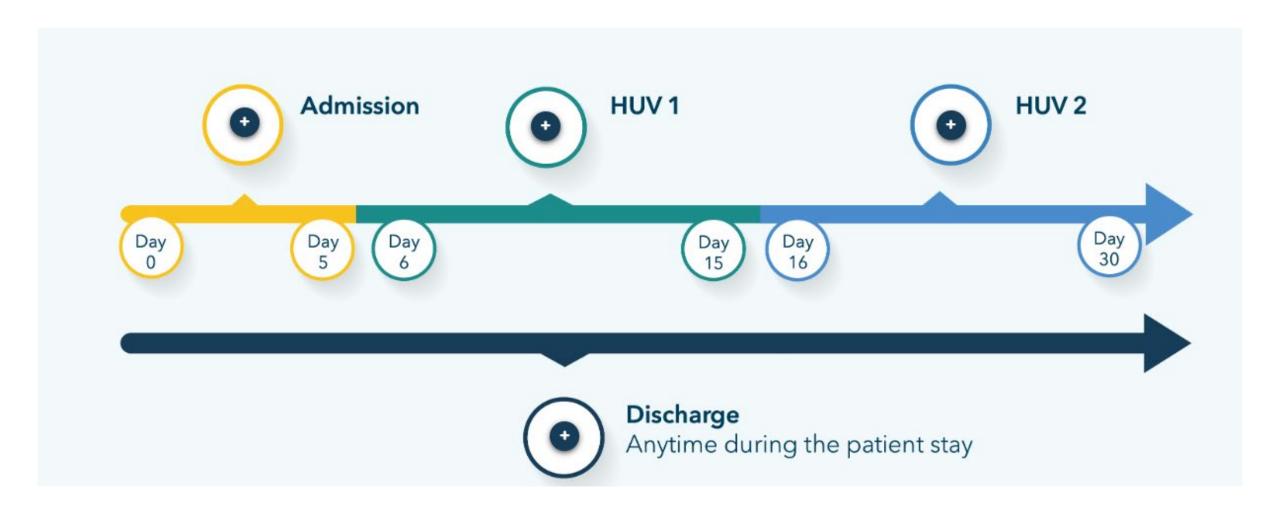
- HOPE Update Visits (H)UV
  - -Collect additional data for HQRP for the first 30 days
  - -Up to 2 HUV dependent on length of stay

Discharge



## **Collection Timepoints**

https://youtu.be/Bmloh\_XN5aM





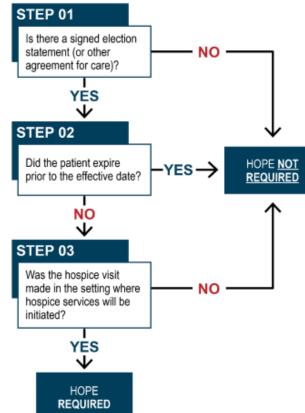
## **Admission Definition**

- Admission HOPE required if: (all three criteria must be met for the purposed of HOPE reporting)
  - -Signed election statement
  - –Patient did not expire before the election or agreement for care
  - -Hospice made a visits in the setting where hospice services are to be initiated



## **Admission Record Flow**

Figure 1: HOPE-Admission Record Flow Chart



#### Situation A

The patient signed an election statement on Monday with an effective date of Tuesday. The nurse went to the patient's home on Tuesday afternoon and the patient expired before the nurse arrived, so the nurse completed a visit with the grieving family.

#### Instructions

In this situation, the hospice is not required to submit the Admission or Discharge HOPE records. Although the patient signed the election statement and survived to the effective date of the election, the patient expired before the hospice visit could be made in the setting where the services were to be provided.

#### Situation B

The consents were signed on the admission date. The nurse was in the process of a visit where care was to be provided, but the patient died during the admission assessment.

#### Instructions

In this situation, since the assessment was in progress, the hospice nurse should complete the Admission and Discharge record with any HOPE data collected during the assessment visit. Due to the brief LOS, the HUV would not be required or expected.

#### Situation C

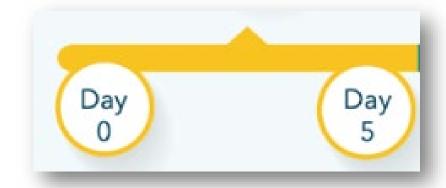
The patient was being transported for admission to an inpatient hospice facility. The admission process (including the election of the hospice benefit) was scheduled for that afternoon. The patient expired during transport, prior to arriving at the inpatient facility.

#### Instructions

In this situation, the hospice is not required to complete or submit HOPE data since the patient expired prior to electing the hospice benefit (hospice election) and before a visit could be made where the services were to be provided (the inpatient hospice).

## **Admission Timepoint**

- Collected within first 5 calendar days of admission
- Election day is Day "0"
- Must be collected by an RN



- Must be In-Person no Telehealth
- •Is to inform the plan of care
- May trigger a Symptom Follow-up Visit (SFV)



## **HUV 1 Timepoint**

- Required between Day 6 and Day 15
  - -Remember date of election is Day "0"
  - -Not to be completed in first 5 days

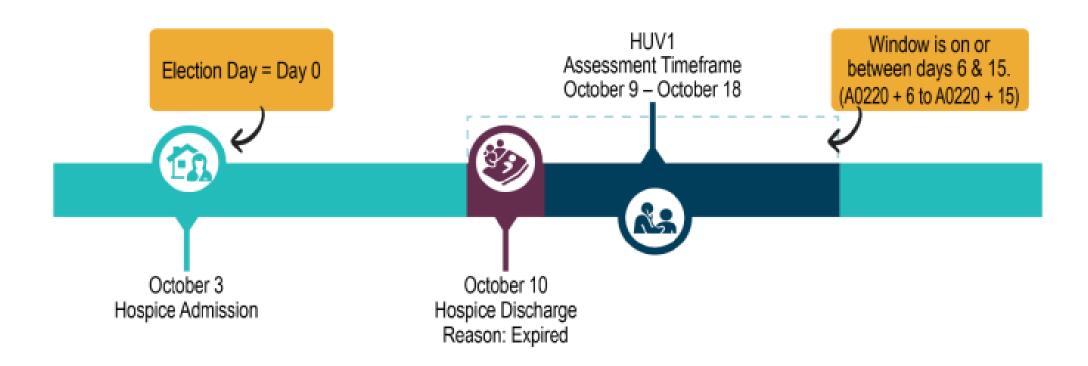


- •If patient discharges prior to collection in that window before HUV 1 completed Discharge HOPE instead
- Must be completed in person by a RN
- •Is to inform the plan of care
- May trigger a Symptom Follow-Up Visit





## Discharge before HUV 1 Timepoint





## **HUV 2 Timepoint**

- Required between Day 16 and 30
  - -Remember date of election is day "0"



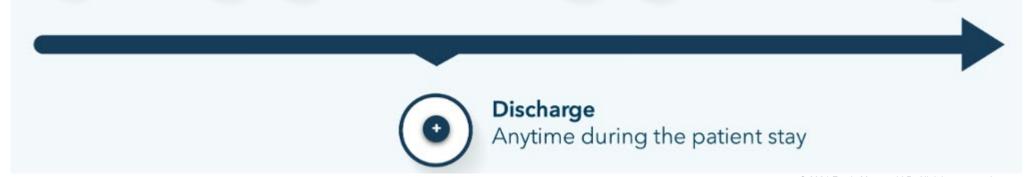
- Last of the HUV visits
- •If patient discharges prior to collection in that window before HUV 2 completed Discharge HOPE instead
- Must be completed in person by an RN
- Is to inform the care plan
- May trigger a Symptom Follow-Up Visit (SFV)



## **Discharge Timepoint**

- Collected for any reason in A2115
- A2115. Reason for Discharge
- A2115. Reason for Discharge **Enter Code** Revoked
  - Expired
  - No longer terminally ill
  - Moved out of hospice service area
  - Transferred to another hospice
  - Discharged for cause

- Collected at any time after Admission
- Collected on ALL patients after Oct 1, 2025
  - -Admissions prior to Oct. 1, 2025 but discharged on or after October 1, 2025 – HOPE discharge only
    - No HIS after October 1, 2025





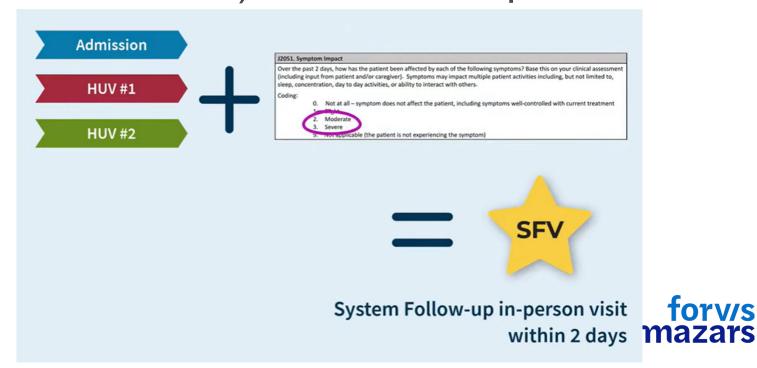
## Symptom Follow UP

- Moderate or Severe Symptom Follow Up Requirement
  - Symptom Follow-Up Visits (SFV) will be required for moderate or severe symptom identification

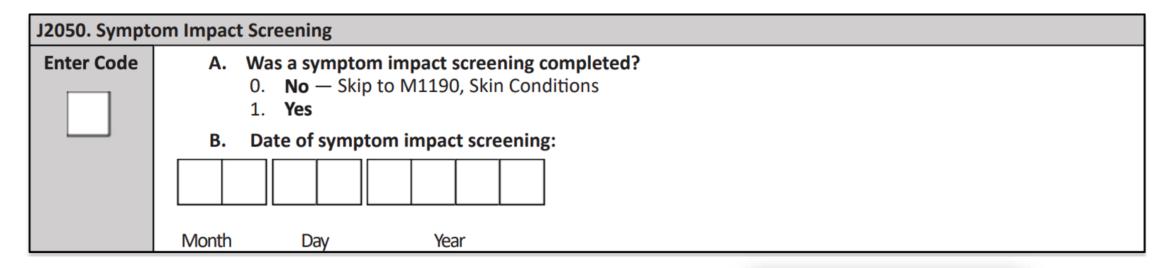
-In-Person nursing (RN or LPN/LVN) must be complected with

in 2 *calendar* days

- -Exemptions
  - Patient refused
  - Patient in the hospital



## J2050 - Admission and HUV 1 & 2



J2050. Symptom Impact Screening asks if the screening was completed during the visit and if so, what the date of the screening was. If a screening was not completed, the clinician would select 0.

No, and skip to the next section on the HOPE tool.

#### **DEFINITION**

#### SYMPTOM IMPACT

The effect of symptom(s) on the patient. Symptoms may impact a patient in multiple ways, (e.g., sleep, concentration, day to day activities).



12051 Symptom Impact

## J2051 – Admission and HUV 1&2

32031. Symptom impact					
Over the past 2 days, how has the patient been affected by each of the following symptoms? Base this on your clinical assessment (including input from patient and/or caregiver). Symptoms may impact multiple patient activities including, but not limited to, sleep, concentration, day to day activities, or ability to interact with others.					
Coding:					
	- symptom does not affect the patient, including symptoms well-controlled with current treatment				
1. Slight	symptom doos not allocatino patient, meraam 8 symptoms from semicinear train can enter a carrier				
2. Moderate					
3. Severe					
	able (the patient is not experiencing the symptom)				
	Enter Code				
	↓				
A. Pain					
B. Shortness of breath					
C. Anxiety					
D. Nausea					
E. Vomiting					
F. Diarrhea					
G. Constipation					
H. Agitation					

This data element asks how the patient has been affected by each symptom listed *over the past 2 days*. The response options range from *0. Not at all*, to *3. Severe*, with an option for *9. Not applicable* (if the patient is not experiencing the symptom at all).

Clinical Assessment &
Judgement required to answer
considering all information
provided by patient,
family/caregiver and/facility staff
in addition to their own
assessment



### Hospice | HOPE SFV

## J 2502 -Symptom Follow Up

- Completed by RN or LPN in person
- Admission or HUV 1 or 2

J2052. Symptom Follow-up Visit (SFV) (complete only if any response to J2051 Symptom Impact = 2. Moderate or 3. Severe)					
Enter Code	An in-person <b>Symptom Follow-up Visit (SFV)</b> should occur within 2 calendar days as a follow-up for any moderate or severe pain or non-pain symptom identified during Symptom Impact assessment at Admission or HOPE Update Visit (HUV).				
	A. Was an in-person SFV completed?  O. No — Skip to J2052C, Reason SFV Not Completed.  1. Yes				
	B. Date of in-person SFV — Complete and skip to J2053, SFV Symptom Impact.  Month Day Year				
Enter Code	<ol> <li>Reason SFV Not Completed — Skip to M1190, Skin Conditions.</li> <li>Patient and/or caregiver declined an in-person visit.</li> <li>Patient unavailable (e.g., in ED, hospital, travel outside of service area, expired).</li> <li>Attempts to contact patient and/or caregiver were unsuccessful.</li> <li>None of the above</li> </ol>				

This item is only completed if any response to J2051. Symptom Impact is *2. Moderate or 3.*Severe. It asks if the follow-up visit was completed. (A.0 = No, or A.1 = Yes) and allows the clinician to either date (B. Date of SFV in-person visit) or skip to C. Reason SFV Not Completed and enter the appropriate code.





### Hospice | HOPE SFV

## J 2053 – SFV Symptom Impact

J2053. SFV Symptom Impact						
Since the last Symptom Impact assessment was completed, how has the patient been affected by each of the following symptoms? Base this on your clinical assessment (including input from patient and/or caregiver). Symptoms may impact multiple patient activities including, but not limited to, sleep, concentration, day to day activities, or ability to interact with others.  Coding:						
0. 1. 2. 3. 9.	Slight Moderate Severe	<ul> <li>symptom does not affect the patient, including symptoms well-controlled with current treatment</li> <li>cable (the patient is not experiencing the symptom)</li> </ul>				
		Enter Code				
		↓				
A. Pain						
B. Shortness of breath						
C. Anxiety						
D. Nausea						
E. Vomiting						
F. Diarrhea						
G. Constipation						

J2053. SFV Symptom Impact asks how the patient was impacted by each of the symptoms since the last Symptom Impact assessment and is completed if applicable based on the clinician's response to J2052.

If Moderate or Severe during this visit – Another visit is NOT required for HQRP purposes BUT..... You should absolutely follow up accordingly to meet the patient needs.



H. Agitation

## Calendar example of HOPE process





## **Two New Measures**

- Measured with HOPE
  - -Timely Follow-Up for Pain Impact process measure will determine how many patients assessed with moderate or severe pain impact were reassessed by the hospice within 2-calendar days
    - Assessed as Moderate or Severe

-HOPE data will be calculated using assessments collected at admission or the HOPE Update Visit (HUV) timepoints



## **Two New Measures**

- Measured with HOPE
  - Timely Follow-Up for Non-Pain Symptom Impact process measure will determine how many patients assessed with moderate or severe non-pain impact were reassessed by the hospice within 2-calendar days
    - shortness of breath, anxiety, nausea, vomiting, diarrhea, constipation, and agitation
    - Assessed as Moderate or Severe
  - –HOPE data will be calculated using assessments collected at admission or the HOPE Update Visit (HUV) timepoints

## **Submission Required**

As of October 1, 2025, hospices must complete and submit only HOPE records to CMS. HIS-Admission and HIS-Discharge records will no longer be accepted by the CMS system after this date.

**HOPE-ADMISSION** HOPE UPDATE VISIT **HOPE-DISCHARGE** SUBMISSION DEADLINE SUBMISSION DEADLINE SUBMISSION DEADLINE SU No later than the Discharge date + 30 calendar days. No la No DISCHARGE TIMEPOINT - HOPE Version 1 Section A Administrative Information Add new record
 Modify existing record HOPE Update Visit 1 (HUV1) A0270. Discharge Date

30 days for Submitted

Reminder



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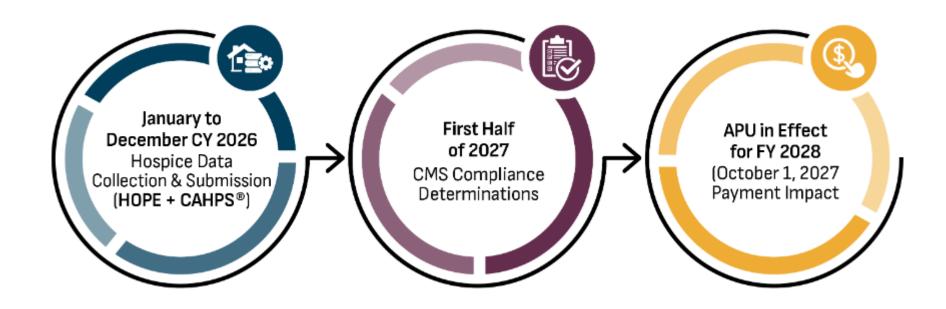
## **CMS** Recommendation for Goals

It is at the discretion of the hospice to develop internal policies for completing and submitting HOPE records according to current requirements. The completion goal is neither a requirement, nor does it affect compliance determination. As of October 1, 2025, the recommended completion goal for HOPE records is the following:

- HOPE-Admission Records: No later than 14 days from the Admission Date (A0220).
   This is unchanged from the recommended completion timing for HIS-Admission records.
- HOPE-HUV Records: No later than 14 days from the Date Assessment was Completed (Z0350) for each specified HUV timepoint.
- HOPE-Discharge Records: No later than 7 days from the Discharge Date (A0270).
   This is unchanged from the recommended completion timing for HIS-Discharge records.



## **HOPE** submission penalties



4% payment reduction in you don't submit 90% or better *on time* 



## **New Measure Reporting**

TIMELY FOLLOW-UP FOR NON-PAIN SYMPTOM TIMELY FOLLOW-UP FOR PAIN IMPACT IMPACT The percentage of hospice patients that have a pain follow-up visit within 2 days after pain impact was initially assessed as Moderate or Severe. Timely Follow-up for Pain Impact Assessments in which pain impact is followed up within 2 days of the initial/triggering assessment date Numerator Denominator Assessments where pain impact is Moderate or Severe

Public reporting
no sooner
than October
2027 which is
FY 2028



## **New Measure Reporting**

## TIMELY FOLLOW-UP FOR NON-PAIN SYMPTOM TIMELY FOLLOW-UP FOR PAIN IMPACT IMPACT The percentage of assessments that have a symptom follow-up visit within 2 days after non-pain symptom impact was initially assessed as Moderate or Severe. Timely Follow-up for Non-Pain Symptom Impact Assessments in which non-pain symptom impact is followed up with a visit within 2 days of the initial/triggering assessment date Numerator Denominator Assessments where at least one non-pain symptom impact is Moderate or Severe

Public reporting no sooner than October 2027 which is FY 2028



## **Get Ready!**

- Plan out education
  - -HOPE Guidance Manual <u>Hospice Outcomes and Patient</u> <u>Evaluation (HOPE) Guidance Manual (cms.gov)</u>
  - -CMS Resources
- Evaluate processes Who and When
  - -Scheduling
  - -Submission processes
  - -Policies



# Hospice | HQRP Resources

### https://www.cms.gov/medicare/quality/hospice

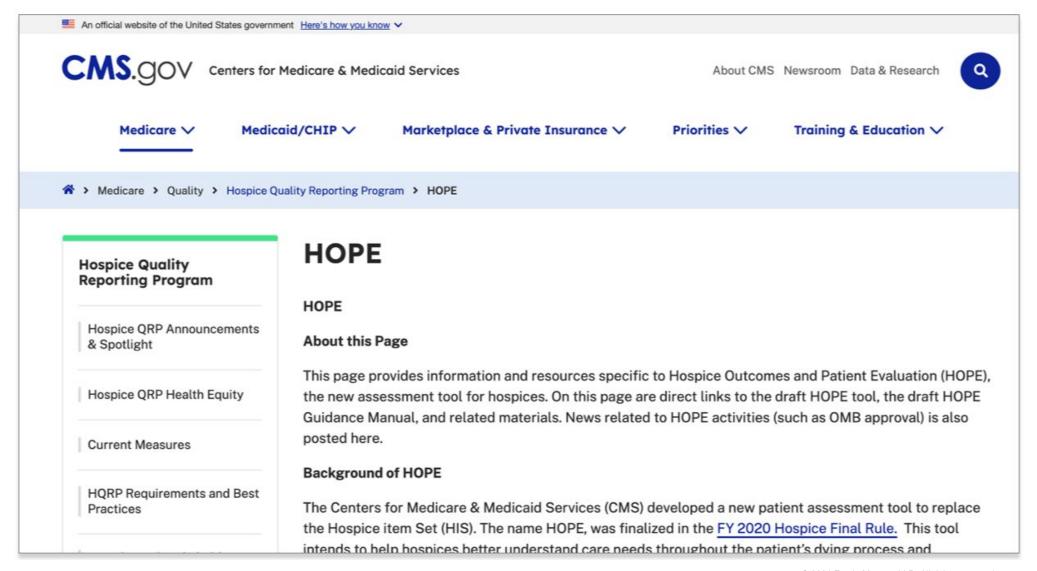




# Hospice | HOPE Resources

### HOPE | CMS

https://www.cms.gov/medicare/quality/hospice/hope





## Resources

## Hospice Item Set (HIS) Version(v)3.00 to Hospice Outcomes and Patient Evaluation (HOPE) v1.00 Item Set Change Table Effective October 1, 2025

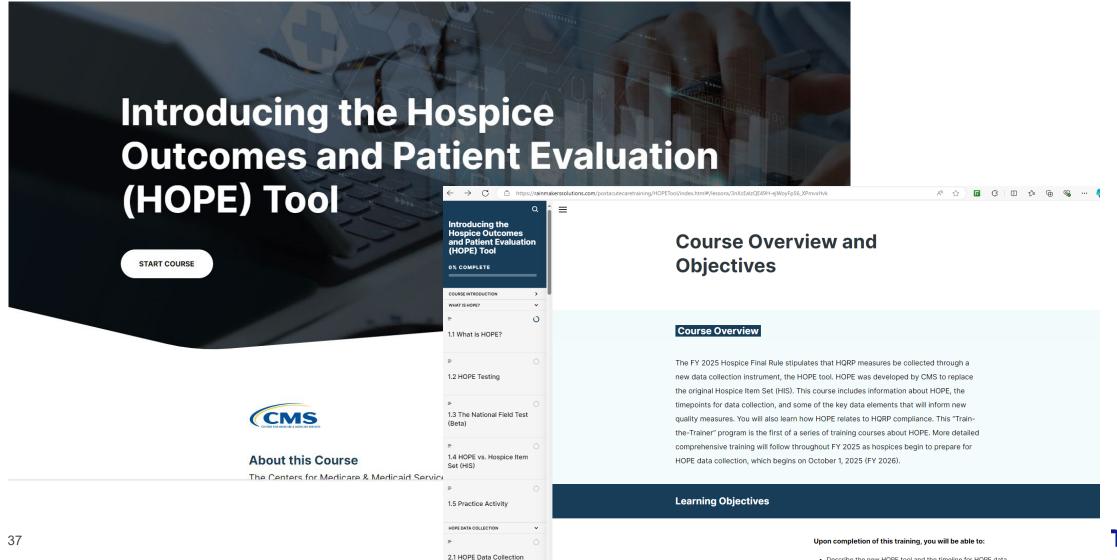
#	Item Set(s) Affected	Item / Text Affected	HIS v3.00	HOPE v1.00	Rationale for Change / Comments
1.	All	Header	HIS - v3.00	HOPE - v1.00	Updated header.
2.	All	Footer	HIS – v3.00 v3.00 Effective 02/16/2021	HOPE Guidance Manual – v1.00	Updated footer.
3.	All	N/A	N/A	Punctuation and style revisions applicable throughout the instrument.	Punctuation and style revisions to align with HIS V3.00 for existing data elements and for standardized patient assessment data elements to align with PAC cross-setting data elements (e.g., Ethnicity A1005, Race A1010).
4.	Admission	A0205	<ul> <li>A0205. Site of Service at Admission</li> <li>01. Hospice in patient's home/residence</li> <li>02. Hospice in Assisted Living facility</li> <li>03. Hospice provided in Nursing Long Term Care (LTC) or Non-Skilled Nursing Facility (NF)</li> <li>04. Hospice provided in a Skilled Nursing Facility (SNF)</li> <li>05. Hospice provided in Inpatient Hospital</li> <li>06. Hospice provided in Inpatient Hospice Facility</li> <li>07. Hospice provided in Long Term Care Hospital (LTCH)</li> <li>08. Hospice in Inpatient Psychiatric Facility</li> <li>09. Hospice provided in a place not otherwise specified (NOS)</li> <li>10. Hospice home care provided in a hospice facility</li> </ul>	<ul> <li>A0215. Site of Service at Admission</li> <li>O1. Patient's Home/Residence</li> <li>O2. Assisted Living Facility</li> <li>O3. Nursing Long Term Care (LTC) or Non-Skilled Nursing Facility (NF)</li> <li>O4. Skilled Nursing Facility (SNF)</li> <li>O5. Inpatient Hospital</li> <li>O6. Inpatient Hospice Facility (General Inpatient (GIP))</li> <li>O7. Long Term Care Hospital (LTCH)</li> <li>O8. Inpatient Psychiatric Facility</li> <li>O9. Hospice Home Care (Routine Home Care (RHC)) Provided in a Hospice Facility</li> <li>99. Not listed</li> </ul>	CMS approved changes to remove "hospice in" and "hospice provided in" language for simplicity.  For response option 06. Added GIP for clarity.  Response option 09. was changed to Hospice Home Care (Routine Home Care (RHC)) Provided in a Hospice Facility. RHC was added for clarity.  Original response option 09 language, "place not otherwise specified (NOS)" was removed.  Added option 99. Not listed.

https://www.cms.gov/files/document/his-v300-hope-v100-all-item-set-change-table.pdf



## Resources

https://rainmakerssolutions.com/postacutecaretrainin g/HOPETool/index.html



# Thank You

Questions???

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