

Hospice Documentation for Supportive Care

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Agenda

- Basic Rules
- What's Different About Hospice Documentation?
- Hospice Audits: What We've Learned
- How Supportive Care Documentation Can Show Decline
- Resources




Hospice Documentation

Basic Rules

Multiple Functions of Documentation

- Record of Care
 - Goals of care
 - Care plan
 - Assessment
 - Interventions
 - Response to treatment
- Communication
- Reimbursement
- Quality Assurance
- Process improvement



Documentation 101 - Legally Speaking...


- Courts view the medical record as verification of patient care.
- If it isn't documented, it isn't done.
- Altered medical records have no credibility.

Documentation 101

Basic Requirements

- Write accurate documentation according to policy.
- Be accurate and truthful.
- Allow no omissions, blanks, or empty spaces.
- Note all communications with other providers.
- List all assessment findings and actions.
- Never refer to documents that are not part of the medical record (incident reports etc.).
- Sign, Date and Lock every entry at the time it is written.
 - Amendments to documentation are available.





Documentation 101

More Basic Requirements

- Write legibly when handwriting.
- Sign with name, credentials.
 - Signatures should be legible, or name printed underneath.
- Use only approved abbreviations.
- Spell words correctly.
- Complete documentation immediately following care.
 - Waiting until the end of the day leads to inaccuracies and has been proven to be more time consuming.
- In EMR, narrative notes to supplement check boxes better support hospice eligibility.

Documentation 101

Illegally changing documentation -> legal risk

- Improperly adding to a colleague's note
- Copy/pasting notes from one event to the next
- Destroying any part of the record
- Omitting facts
- Deliberately documenting inaccurate information
- Falsifying entry date/time or late entry without indication late.





Documentation 101

Computer Corrections

- Late entries are better than no entry at all.
- Start the late entry with the date and time of the entry.
- Label the documentation as “late” entry.
- Explain in narrative why the entry is late.
- Note the date and time that the entry should have been written.
- Always sign, date and lock documentation.

Hospice Documentation

What's Different About Hospice?



What's the Purpose?

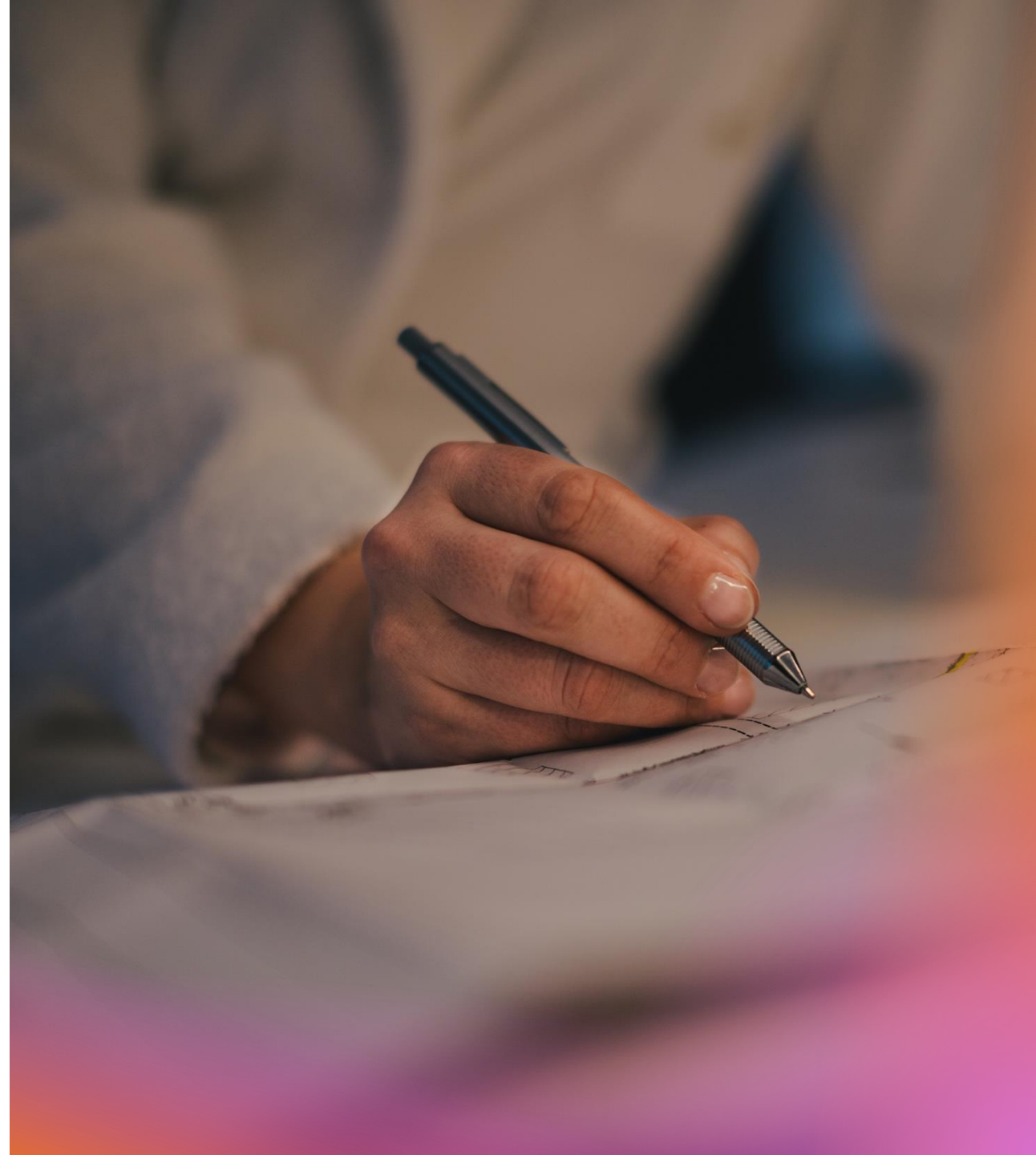
- Proof of patient eligibility.
- Documentation of decline is hospice industry specific.
- Proof of care and services rendered to patient.
- Support for the level of care provided.
- Advocacy to preserve the HMB.
- Basis for the ADR response.
- Response to any other audits (RAC, MIC, ZPIC/UPIC).

A background image showing a person's hands writing on a notepad with a pen. The image is slightly blurred, focusing on the text overlay. The text overlay is a semi-transparent white box with a light blue border, containing the title 'Hospice Documentation' and a descriptive sentence.

Hospice Documentation

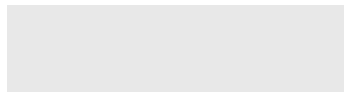
Hospice documentation requires attention to different factors than simple clinical notes.

- **All Notes Should be Driven by the Interdisciplinary Plan of Care**
- **All Notes should stand alone**
- **All Notes should paint a picture**



Hospice Documentation: General Tips

- Document to problems identified in the POC.
- Read the last clinical notes from each discipline prior to this visit
- Quote what others report
- Use events for recollection (holidays, seasons).
- Avoid vague terms (bed bound, WNL, limited).
- Paint the picture – can someone “See” the person?
- Specific documentation – not cookie cutter notes.
- Document objectively (see, smell, hear, touch, measure).
- POC should snapshot recent 2 weeks.
- Education and teaching. Think of CAHPS questions – these are your responsibility.



Hospice Documentation Checklist

- ☒ Are all pieces of the note complete?
- ☒ Are all areas addressed completely? Is the information clear and understandable to third party?
- ☒ Does the note include the plan of care components?
- ☒ Could another person read this note and continue the plan of care effectively?
- ☒ Does the record paint a clear picture of the hospice patient and family, interventions and responses/outcomes?
- ☒ Are you using “negative charting?”
- ☒ Does the documentation show active and ongoing assessment?
- ☒ Are psychosocial and spiritual concerns on the care plan and documentation that they are being addressed?
- ☒ Does the documentation indicate communication and training with patient, family and caregivers?
- ☒ If a surveyor were to read your documentation, would the documentation reflect the care being provided, interdisciplinary coordination and care?

What We've Learned

Hospice Audits

Types of Hospice Audits

- **TPE**
 - Targeted Probe & Educate
- **ADR**
 - Additional Document Request
- **UPIC**
 - Unified Program Integrity Contractors



The Cost....

- \$ that can be used for patient care.
- Time that can be used for staff/patient care.
- Anxiety that can be spared.



Audits: What we learned

- It's a reality for hospices across the nation.
- Critical for preventing claim denials and/or ensuring successful audits.
- Document in a specific way to pass audits.
 - Document negatively.
 - Document showing decline.
- Auditors are known to look back three years at cases – start now.



What does that have to do with me?

- Consents – Details matter
- Assessments
 - Initial
 - Comprehensive
 - Updates to comprehensive – at least every 15 days
- Visit notes
- IDG notes/summaries
- Levels of Care
 - Understand the regulations
 - Document appropriately for the level of care



THE WHY

Because we are
professionals
& we care

Assessments

Initial

- Must be completed by Hospice RN
- Within 48 hours after the election of hospice care is complete
- UNLESS the physician, patient or representative requests that it be completed in less than 48 hours
- Must address physical, psychosocial, emotional and spiritual status related to the terminal illness and related conditions

Comprehensive

- Must be completed by hospice IDG, in consultation with attending physician (if any)
- No later than 5 calendar days after the election of hospice care
- Definition states “... this includes a thorough evaluation of the caregiver’s and family’s willingness and capability to care for the patient.”
- Must identify physical, psychosocial, emotional, and spiritual needs related to the terminal illness that must be addressed in order to promote the patient’s well-being, comfort, and dignity throughout the dying process.
- Must be on-going – at least every 15 days

Comprehensive Assessment (cont'd)

- ~~Pain~~
- ~~Dyspnea~~
- ~~Nausea~~
- ~~Vomiting~~
- ~~Constipation~~
- ~~Restlessness~~
- Anxiety
- ~~Sleep disorders~~
- ~~Skin integrity~~
- ~~Confusion~~
- Emotional distress
- Spiritual needs
- Support systems
- Family need for counseling and education
- Additional information, as necessary

Updating the Comprehensive Assessment

- Must be accomplished by the IDG, in collaboration with the attending physician (if any)
- Must consider changes that have taken place since the initial assessment
- Must include information on:
 - Patient's progress toward desired outcomes
 - Reassessment of the patient's response to care
- Must be accomplished:
 - As frequently as the condition of the patient requires
 - BUT no less frequently than every 15 days

IDG & Care Planning

- 418.56 The IDG, in consultation with the attending physician (if any), must prepare a written plan of care for each patient.
- The plan of care must:
 - Specify the hospice care and services necessary to meet the patient and family-specific needs *identified in the comprehensive assessment* as such needs relate to the terminal illness and related conditions

518.56 (c) Plan of Care includes

- Patient and family goals and interventions
- Based on problems identified in the
 - Initial assessment
 - Comprehensive assessment
 - Updates to the comprehensive assessment



518.56 (e) Coordination of Services

The Hospice must develop and maintain a system of communication and integration .





How WE Can Show Decline

Supportive Care
Documentation

Medicare Hospice Eligibility

- Nurses and Physicians – document against the local coverage determination (LCD) and level of care criteria
- Social Workers, Chaplains, Music Therapists – can provide reiteration and supportive documentation



Supportive Care Documentation

What can we do?

While we have a different scope of practice and cannot document the same as nurses or doctors, our documentation can be used to support terminal decline.



Here's what nurses are taught...
How can we support within our scope of practice?



Transfers

- How does the patient transfer?
 - Independent, assist x1, 2 – full assist or partial, Max assist?
 - Stand-pivot? Sit to Stand lift? Full body lift?
- Has their transfer ability declined?
- Do they require more help?

Locomotion

- Do they ambulate?
- How far? How often?
- Do they need stop and take breaks?
- What happens when they ambulated? (i.e. fatigue, weakness, dyspnea)
- With how much assistance?
- Do they require supportive equipment?
 - Walker (type), O2, gait belt, cane (type), etc.
- How was ambulation 6 months prior?
- Non-ambulatory? Wheelchair? Self-propel or pushed (totally dependent).





ADLs

- To what degree does the patient participate in ADLS?
- Independent? Can they wash upper body, hands? Needed cueing?
- Why is their participation limited? (SOB, confusion, pain, etc.)
- How do they bathe? (whirlpool, tub, shower, bed, on a liter or trolley?)
- If a patient does not participate in bathing, they are “totally dependent.”

Mobility in Bed

- Are they able to reposition themselves?
- How much help do they need for repositioning?
- How many staff to pull them up in bed?
- Can they hold onto the side rail?
- Can they roll side to side?
- Hold their position? Require propping? Wedges?
- What mattress is required (floor, perimeter, APM, LAL, etc.)
- Are they at high risk for skin breakdown related to repositioning?



Seating

- Impaired structure and function leads to seating changes:
 - Wheelchair
 - Wheelchair with footrests
 - High-backed wheelchair – cannot sit independently
 - High-back wheelchair with head or foot supports – cannot control head or feet
 - Geri chair – no longer comfortable in the sitting position
 - Geri chair with positioning devices – cannot maintain body alignment
 - Any props, pads, wedges, cushions, rolled blankets, etc. that assist.

Communication

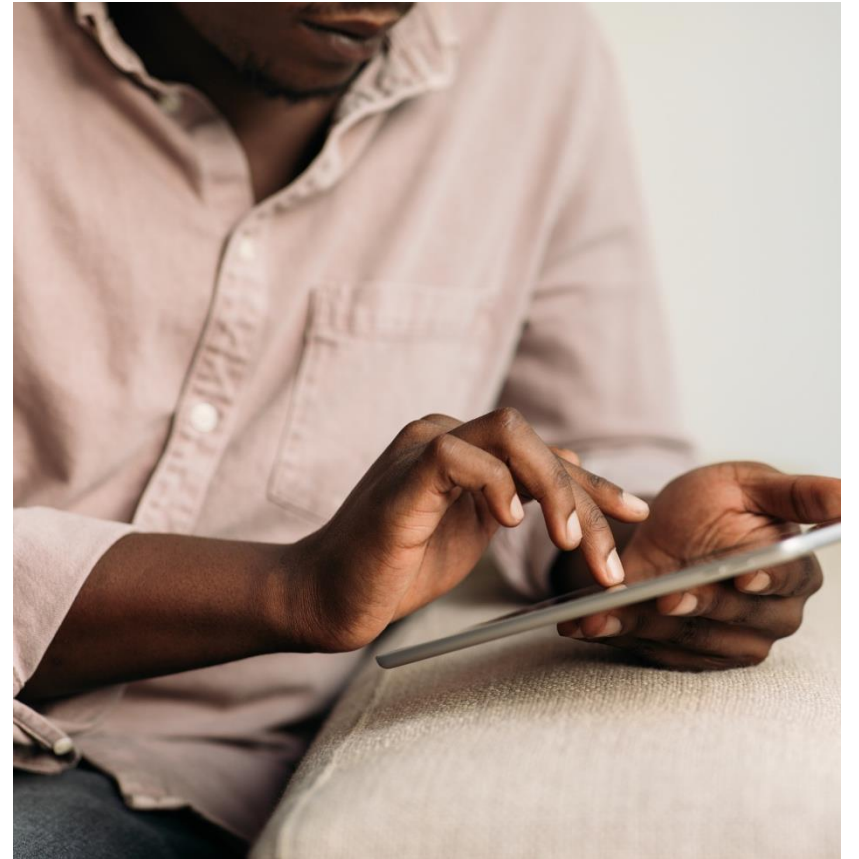
- **Can the patient communicate in a meaningful way?**
- **Can they be understood?**
- **Any assistive devices? (board, sign, etc.)**
- **Can they complete sentences? Why not?**
- **Do they exhibit frustration or behaviors r/t inability to communicate?**
- **Can they make their needs clearly known? Use the call bell?**
- **What is their speech pattern? (repetitive, non-sensical, limited, etc.)**
- **Can they answer yes/no questions? With any degree of meaning?**

Behaviors

- What behaviors does the patient exhibit?
- Anxious? Repetitive? Depressed? Agitated? Sundowning?
- Rocking? Hand-wringing? Grinding teeth? Yelling?
- Scratching or picking? Inappropriately sexual or social behavior?
- Combative with any particular situation or experience?
- Wandering?
- Crying?
- Visual or auditory hallucinations? Delusions?

What we can do....

- Be observant
- Compare patient over time
- Use descriptions not generalizations
 - What you see
 - What you hear
- Quote caregiver, patient, etc.

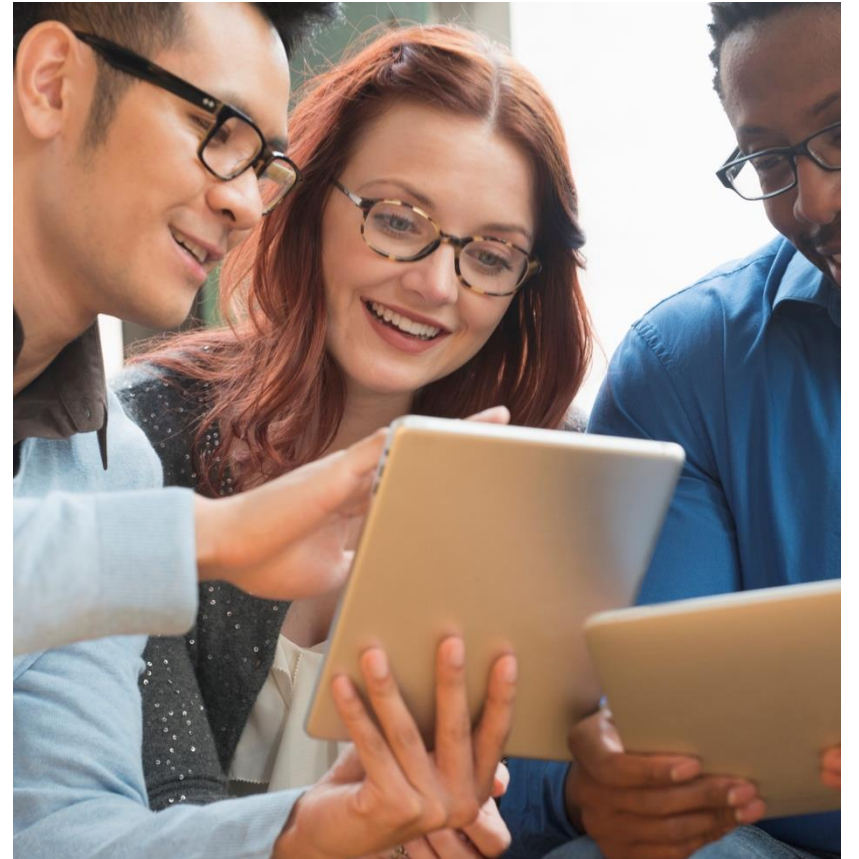


What we can do....

- Document to the Care Plan and YOUR interventions
- Do not document out of your scope of practice. We are not nurses.
- Read all previous notes - consistency
- What do you see, hear, experience.....
- Be succinct – do not be wordy. Stay focused.
- Document during the visit, in your car. Same day.

YOU make a difference

- Most importantly with patients and families....
- **AND** because you understand how you document makes a difference.



Resources

- Federal Register : Medicare and Medicaid Programs: Hospice Conditions of Participation
- Understand Hospice Audit Types, Processes to Boost Compliance - Hospice News
- Compliance for Hospice Social Workers & Chaplains (hhvna.com)
- Five Steps to proper Hospice Chaplain Documentation- For Routine Visits – Hospice Chaplaincy
- Initial Chaplain Visit Assessment and Documentation Examples – Hospice Chaplaincy

Thank you

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