

# Hospice: Conduct Quality Audits and Mock Surveys Now to Prepare for SFP

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CMS is moving forward with the hospice Special Focus Program (SFP), effective January 1, which takes aim at poorly performing hospices with increased monitoring and the threat of potential removal from the Medicare program.

Unfortunately, it's too late for hospices to make changes to avoid being selected for the program, says Robert Markette, attorney with Hall, Render, Killian, Heath & Lyman in Indianapolis, Ind.

CMS is looking back on the last three years of survey data, so even if you've made improvements since the proposed rule came out, survey deficiencies from the past three years put you at risk for selection, Markette says.

If you are selected for the program, you need to get through it without any deficiencies.

In order to "graduate" out of the SFP, a hospice will need to have no condition-level deficiencies for any two SFP surveys in an 18-month period and have no pending complaint survey at an immediate jeopardy or condition level.

After completing the SFP, a hospice will receive a one-year post SFP survey and then would return to the regular 36-month cycle for surveys.

Those who do not achieve this will be expelled from the Medicare program.

While hospices haven't yet been selected for the SFP, the algorithm to select them has been finalized.

To determine "poor performance," CMS identified several indicators in the final rule:

- Survey reports with condition-level deficiencies
- Complaints with substantiated allegations
- CMS Medicare data sources from the Hospice Quality Reporting Program (HQRP)
- Medicare claims and CAHPS Hospice Survey results

While SFP participants will only be pulled from the bottom 10% of hospices, all agencies should be preparing for being selected, even for future selections.

### **Focus on survey preparation**

The best thing poor-performing hospices can do right now is anticipate being selected for the program and prepare to get through to the other side.

“The only way out is through,” Markette says. So, agencies should take these steps right now to prepare for the special focus surveys:

**Identify past survey deficiencies.** If your agency has had any deficiencies in past surveys, use those as guides for what to focus on. SFP surveyors will know what deficiencies you’ve been cited with in the past, so it’s almost a guarantee that they will scrutinize these areas during a survey.

**Check your quality data.** CMS published provider preview reports in August with HQRP data. This data from Care Compare should give agencies a good idea of where they stand in comparison to other agencies.

CAHPS data is also important to look at.

“It’s all about comparing yourself to other agencies right now,” Markette stresses. It might be impossible to tell if you’re in the bottom 10% of agencies, but your Care Compare data will show you if you’re performing below the national average.

This, coupled with past condition-level deficiencies, is the best indicator of whether you’re at risk of being included in the SFP.

**Conduct a mock survey.** Agencies can either do this themselves or hire a consultant to do it. By hiring an outsider to conduct the survey, there’s a better chance that your staff will be caught off guard, and the mock surveyor can catch things that need to be improved before the real surveyor comes.

During the mock survey, agencies should first focus on quality of care. Quality of care is the backbone of the SFP, so it’s what surveyors will likely pay most attention to.

**Improve your quality-of-care baseline.** All agencies, not just poor performers, should be focused on survey prep right now, Markette says.

“Just because an agency’s scores doesn’t get them selected for the program now, it doesn’t mean those same scores will protect them in the future,” he stresses.

This program is going to change the baseline for what is considered quality care, and all agencies should be focused on improving their care now.