

# Compliance Tip Sheet

National Hospice and Palliative Care Organizations  
www.nhpco.org/ahpca/hospice



## 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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**Tina M. Marrelli**

A red circular graphic with a gradient, appearing as a semi-circle or a partial circle, located to the right of the name bar.

## Nhpco Compliance Tip Sheet:

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

*The Changing Face of Health Care Social Work, Third Edition* Sophia F. Dziegielewska, 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

*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

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**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 Fundamentals of Nursing - E-Book Patricia A. Potter, Anne G. Perry, Patricia A. Stockert, Amy Hall, Wendy R. Ostendorf, 2025-01-15 Selected for 2025 Doody s Core Titles with Essential Purchase designation in Fundamentals Learn the concepts and skills and develop the clinical judgment you need to provide excellent nursing care Fundamentals of Nursing 12th Edition prepares you to succeed as a nurse by providing a solid foundation in critical thinking clinical judgment nursing theory evidence based practice and person centered care in all settings With illustrated step by step guidelines this book makes it easy to learn important skills and procedures Care plans are presented within a nursing process framework that is coordinated with clinical judgement and case studies show how to apply concepts to nursing practice From an expert author team led by Patricia Potter and Anne Perry this bestselling nursing textbook helps you develop the understanding and clinical judgment you need to succeed in the classroom and in your career **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

Nhpco Compliance Tip Sheet: Bestsellers in 2023 The year 2023 has witnessed a remarkable surge in literary brilliance, with numerous captivating novels captivating the hearts of readers worldwide. Lets delve into the realm of popular books, exploring the fascinating narratives that have charmed audiences this year. The Must-Read : Colleen Hoover's "It Ends with Us" This poignant tale of love, loss, and resilience has captivated readers with its raw and emotional exploration of domestic abuse. Hoover skillfully weaves a story of hope and healing, reminding us that even in the darkest of times, the human spirit can succeed. Uncover the Best : Taylor Jenkins Reid's "The Seven Husbands of Evelyn Hugo" This intriguing historical fiction novel unravels the life of Evelyn Hugo, a Hollywood icon who defies expectations and societal norms to pursue her dreams. Reid's compelling storytelling and compelling characters transport readers to a bygone era, immersing them in a world of glamour, ambition, and self-discovery. Nhpco Compliance Tip Sheet : Delia Owens' "Where the Crawdads Sing" This captivating coming-of-age story follows Kya Clark, a young woman who grows up alone in the marshes of North Carolina. Owens weaves a tale of resilience, survival, and the transformative power of nature, captivating readers with its evocative prose and mesmerizing setting. These bestselling novels represent just a fraction of the literary treasures that have emerged in 2023. Whether you seek tales of romance, adventure, or personal growth, the world of literature offers an abundance of captivating stories waiting to be discovered. The novel begins with Richard Papen, a bright but troubled young man, arriving at Hampden College. Richard is immediately drawn to the group of students who call themselves the Classics Club. The club is led by Henry Winter, a brilliant and charismatic young man. Henry is obsessed with Greek mythology and philosophy, and he quickly draws Richard into his world. The other members of the Classics Club are equally as fascinating. Bunny Corcoran is a wealthy and spoiled young man who is always looking for a good time. Charles Tavis is a quiet and reserved young man who is deeply in love with Henry. Camilla Macaulay is a beautiful and intelligent young woman who is drawn to the power and danger of the Classics Club. The students are all deeply in love with Morrow, and they are willing to do anything to please him. Morrow is a complex and mysterious figure, and he seems to be manipulating the students for his own purposes. As the students become more involved with Morrow, they begin to commit increasingly dangerous acts. The Secret History is a brilliant and gripping novel that will keep you speculating until the very end. The novel is a warning tale about the dangers of obsession and the power of evil.

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