

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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O García

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

Nhpco Compliance Tip Sheet:

The Top Books of the Year Nhpc Co Compliance Tip Sheet The year 2023 has witnessed a remarkable surge in literary brilliance, with numerous captivating novels captivating the hearts of readers worldwide. Let's 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 touching 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 triumph.

Uncover the Best : Taylor Jenkins Reid's "The Seven Husbands of Evelyn Hugo" This spellbinding historical fiction novel unravels the life of Evelyn Hugo, a Hollywood icon who defies expectations and societal norms to pursue her dreams. Reid's captivating storytelling and compelling characters transport readers to a bygone era, immersing them in a world of glamour, ambition, and self-discovery.

Discover the Magic : Delia Owens' "Where the Crawdads Sing" This evocative coming-of-age story follows Kya Clark, a young woman who grows up alone in the marshes of North Carolina. Owens crafts 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 masterful and gripping novel that will keep you guessing until the very end. The novel is a cautionary tale about the dangers of obsession and the power of evil.

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