

NAHC Report

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OIG Report on Hospice Aide Supervisory Visits



- **Deficiencies found and remedies recommended by OIG**

The Department of Health and Human Services' (HHS) Office of the Inspector General (OIG) recently released another report pertaining to the quality of hospice care. In this report, [Registered Nurses Did Not Always Visit Medicare Beneficiaries' Homes At Least Once Every 14 Days To Assess The Quality Of Care And Services Provided By Hospice Aides](#), the OIG identified two findings:

Registered nurses did not always:

- visit hospice beneficiaries' homes at least once every 14 days to assess the quality of care and services provided by hospice aides or
- document the visits in accordance with Federal requirements

Since 2009, the Centers for Medicare & Medicaid Services (CMS) has consistently identified this standard as one of the top seven standards with the most deficiencies. The OIG's objective was to determine whether registered nurses visited hospice beneficiaries' homes at least once every 14 days to assess the quality of care and services provided by hospice aides and documented the visits in accordance with Federal requirements.

The audit covered approximately 189,000 high-risk registered nurse visit date-pairs from January 1 through December 31, 2016. A date-pair consisted of two care visits that were made by a registered nurse to a beneficiary's home and that were more than 14 days apart. All date-pairs were for patients with aide services and receiving either routine home care or continuous home care. The OIG reviewed a random sample of 78 date-pairs and estimated the number of date-pairs that did not comply with Federal requirements.

According to the OIG, these deficiencies occurred because of hospices' lack of oversight, scheduling errors, employee turnover, and the registered nurses not being aware of the 14-day supervisory visit requirement. In addition, some hospices could not explain why the registered nurses did not make the required supervisory visits at least once every 14 days. As a result, the OIG determined there was no assurance that beneficiaries admitted to those hospices received the appropriate care while in hospice care.

The OIG recommends that CMS promote hospices' compliance with the condition-of-participation standard that requires registered nurses to visit hospice beneficiaries' homes at least once every 14 days to assess the quality of care and services provided by hospice aides, which could include

- working with State survey agencies and accreditation organizations to increase emphasis on oversight of this requirement,
- educating hospices about the requirements associated with this standard, and
- making this standard a quality measure.

The OIG also recommends that CMS take action to ensure that all registered nurses' supervisory visits of hospice aides are documented in accordance with applicable CMS regulations and interpretive guidelines. CMS concurred with the recommendations and described actions that it plans to increase awareness of the aide supervisory requirement to State survey agencies and accreditation organizations in surveyor training, and further educate hospices about the requirement through various channels including the Medicare Learning Network, weekly electronic newsletters, and quarterly compliance newsletters.

The OIG released two other reports pertaining to hospice quality this summer along with another report that addressed abuse and neglect in the Medicare population. The concerns raised in the reports have prompted the introduction of legislation in the Senate. NAHC Report covered the initial release of these reports as well as NAHC's response to the reports and the introduction of the legislation. Links to articles addressing these topics are below.

July 11, 2019 [OIG Releases Two Reports Targeting Hospice Survey Deficiencies and Quality of Care](#)

July 19, 2019 [Abuse & Neglect in the Medicare Population: A Recent OIG Report](#)

July 31, 2019 [After OIG Reports, House Committee Seeks More Info on Hospice Deficiencies](#)

September 24, 2019 [NAHC Issues Recommendations in Response to OIG Reports on Hospice Survey Performance and Related Concerns](#)

October 17, 2019 [OIG Updates Work Plan to Include Review of Hospice Inpatient and Aggregate Cap Calculations](#)

November 7, 2019 [Legislation to Address OIG Hospice Survey Concerns Introduced in Senate](#)