

July 5, 2024

TO: NHPCO Provider and State Members

FROM: NHPCO Quality Team

RE: Hospice Quality Reporting Program Noncompliance Notification and Reconsideration Period

Summary at a Glance

The Centers for Medicare and Medicaid Services (CMS) provided notification that FY 2025 Hospice Quality Reporting Program (HQRP) non-compliance letters were distributed on July 3, 2024. Hospices that receive a letter of non-compliance have 30 days to file a reconsideration request following the procedures outlined on the [Hospice Reconsideration Requests](#) webpage. **Members should note that the 30-day reconsideration period is based on the date of the letter distributed electronically to the CASPER folder via QIES.**

Hospices that were noncompliant with FY 2025 HQRP reporting requirements will receive notification from their Medicare Administrative Coordinator (MAC) and a notification in their Certification and Survey Provider Enhanced Reports (CASPER) folder. Both notifications are considered official notices.

Providers are also encouraged to review the [Hospice Outreach Email - June 2024](#), which provides important Annual Payment Update (APU) reminders for the Fiscal Year (FY) 2025 Hospice Quality Reporting Program (HQRP).

Hospices that are compliant with HQRP submission requirements will not receive any notification. **Members are encouraged to check their CASPER folder for noncompliance notifications well as check for notification letters from their MAC throughout the month of July.**

FY 2025 HQRP compliance is based on calendar year (CY) 2023 data collection for the Hospice Item Set (HIS) and Consumer Assessment of Healthcare Providers and Systems (CAHPS®). Hospices that did not submit at least 90 percent of all HIS Admission and HIS Discharge records within 30 days of the event, or that did not participate in CAHPS® for all 12 months of the calendar year, will be subject to a 4 percent APU reduction. Administrative data (Hospice Visits in Last Days of Life and Hospice Care Index) are collected from claims and hospices are considered automatically 100 percent compliant with submission of claims-based data. For more information, visit [Getting Started with the Hospice Quality Reporting Program](#) or [Timeliness Compliance Threshold for HIS Submissions Fact Sheet](#).

Hospices that are found to be noncompliant and believe the determination was made in error may pursue a reconsideration request following instructions provided on the [Reconsideration Requests](#) webpage.

Provider-initiated requests for extensions or exemptions may be available for hospices experiencing an extraordinary circumstance. Requests must be initiated within 90 days of the event or circumstance, via email, following the instructions on the [Extension and Exemption Requests](#) webpage.

Additional NHPCO Resources

NHPCO has developed the *Charting a Course to Quality HQRP Toolkit* as a resource to assist member organizations in navigating the Hospice Quality Reporting Program and discussing publicly reported quality measures with patients, families, and community stakeholders. *Charting a Course to Quality* provides step-by-step guidance to hospice organizations on how to incorporate robust processes to collect, submit, and monitor performance on the required HQRP measures into their quality and performance improvement programs. Members can download this resource from the [NHPCO Quality Resources](#) page.

Additional HQRP Resources

- CMS HQRP QM User's Manual V1.01 (Aug 2022): <https://www.cms.gov/files/document/hqrp-qm-users-manual-v101aug2022.pdf>
- CMS Hospice Quality Reporting Program (HQRP): <https://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/Hospice-Quality-Reporting>
- CMS HQRP Current Measures: <https://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/Hospice-Quality-Reporting/Current-Measures>
- CMS HQRP Public Reporting: Key Dates for Providers: <https://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/Hospice-Quality-Reporting/Public-Reporting-Key-Dates-for-Providers>
- CMS HQRP Announcements and Spotlight: <https://www.cms.gov/medicare/quality/hospice/hospice-grp-announcements-spotlight>
- CMS Calculating and Reporting Claims-Based Measures within the HQRP: <https://www.cms.gov/files/document/questionsandanswersclaims-basedmeasuresfeb2022.pdf>
- CMS Open Door Forum Podcast and Transcripts: <https://www.cms.gov/training-education/open-door-forums/about/odf-podcast-and-transcripts>
- CMS Hospice Quality Reporting Program (HQRP) Informational Video: <https://www.youtube.com/watch?v=nfcq80J6csw>

Please reach out to quality@nhpco.org with any questions.