



Medicare Hospice Conditions of Participation Volunteers and Volunteer Managers

Summary

Highlights of key changes for volunteer manager professionals and guidance for implementation

- 1) 418.52 Patient's rights
- 2) 418.56 Interdisciplinary group, care planning, and coordination of services
- 3) 418.78 Volunteers
- 4) 418.100 Organization and administration of services
- 5) 418.114 Personnel qualifications for licensed professionals -- Criminal Background Checks

Background

There are several key changes to the new Medicare Conditions of Participation that will affect volunteer programs. Some of the new regulations are already being met by hospice programs, but for many programs there will be a need to invest time and resources to become compliant on December 2, 2008. For the purposes of the Conditions of Participation, volunteers are considered employees and the same requirements for orientation, training and criminal background checks apply.

418.52 Patient's rights

From the volunteer perspective, all written and verbal information to patients must include the provision of volunteer services. Agency cooperation is needed so that volunteer services are introduced to the patient so that they can decide whether or not they desire the services.

418.56 Interdisciplinary group, care planning, and coordination of services

There is an increased need to be sure that volunteers are a part of the care planning process. The volunteer role as part of the IDT is an integral part of this rule. Volunteer coordinators or volunteers must be part of the care planning process, document on the plan of care for all patients receiving volunteer services and review, revise and document the individualized plan as frequently as the patient's condition requires, but no less frequently than every 15 calendar days.

Section 418.56 (c) also requires "a detailed statement of the scope and frequency of services to meet the patient's and family's needs, and that the plan of care must be reviewed as frequently as the patient's condition requires, but no less frequently than every 15 days. This will have the greatest impact on a program if it's not documenting to the plan of care already. It requires that when a volunteer is part of the care of a patient, the scope, frequency and update happens just as it does for all other disciplines. In general, this new language emphasizes the increased importance of volunteers and will enable volunteers to document and therefore prove the value of the work volunteers do for patients and families.

418.78 Conditions of participation— Volunteers

The phrase 'day to day', as used, requires hospices to incorporate volunteer services into their daily patient care and operations routine in order to retain the volunteer-based essence of hospice as it originated in the United States. This language is used to ensure that hospice programs fully integrate volunteers into the work of the organization. In order to meet the 5 percent requirement, volunteers must be providing services related to patient care or administrative support.

The following is a response to the counting of travel time as presented by CMS. “We understand that traveling, providing care or services, documenting information, and calling patients all consumes volunteer time, and we agree that the time may be used in calculating the level of volunteer activity in a hospice.

If a hospice chooses to include any of these areas that are directly related to providing direct patient care or administrative services in its percentage of calculation of volunteer hours, it must ensure that the time spent by its paid employees and contractors for the same activity is also included in the calculation. What that means is that if staff is paid for the time it takes them to drive to a patient’s home, then the time it takes for a volunteer to drive to a patient’s home may be counted. However, if you do not pay an administrative staff for the time it takes to drive to the office, then you cannot count the travel time of the volunteer who drives to an office location to volunteer.”

A hospice may use a volunteer to provide assistance in the hospice’s ancillary and office activities as well as in direct patient care services, and/or help patients and families with household chores, shopping, transportation, and companionship. Hospices are also permitted to use volunteers in non-administrative and non-direct patient care activities, although these services are not considered when calculating the level of activity. An example of a non-administrative and non-direct patient care activity may be sewing or quilting.

418.100 Organization and administration of services

Volunteers are considered employees and therefore volunteer training and orientation should be closely aligned with that of staff. It is up to hospice programs to define the criteria for becoming a volunteer. The CoPs do define however that employees (volunteers) and contracted staff furnishing patient care should be oriented in hospice philosophy, and this requirement has been added to 418.100 (g) (1) that defines training.

A hospice must provide orientation about hospice philosophy to all employees (volunteers) and contracted staff that have patient and family contact. A hospice must provide an initial orientation for each employee (volunteer) that addresses the employee’s (volunteer’s) specific job duties. A hospice must assess the skills and competence of all individuals furnishing care, including volunteers furnishing services, and, as necessary, provide in-service training and education programs where required. The hospice must have written policies and procedures describing its method(s) of assessment of competency and maintain a written description of the in-service training provided during the previous 12 months.

418.114 Personnel qualifications for licensed professionals – Criminal Background Checks

Many hospices do not background screen their volunteers so this is an added requirement. To implement this change, volunteers will need to be educated about the reasons for this requirement, and some financial resources will need to be allocated to cover the expense of criminal background checks. Criminal background checks must be obtained in accordance with State requirements. In the absence of State requirements, criminal background checks must be obtained within 3 months of the date of employment for all states that the individual has lived or worked in the past three years. Although the scope of the background checks is not defined, volunteer services programs should follow the same guidelines as is used by the human resources department.

Resources I will need to be successful?

- Ensure that volunteers are an integral part of the services provided by the hospice and include them in care planning and interdisciplinary group meetings.
- Use other materials developed for volunteer programs featured in the NHPCO Marketplace
- Join the NCHPP volunteer manager section
- Join at least one of the eNCHPP list serves to get more information and stay current

Developed by the NCHPP Volunteer/Volunteer Management Section