

Hospice and Palliative Care Resources for the Coronavirus Disease (COVID-19)



NHPCO COVID-19 Update – 07/15/20

NHPCO has created this update for hospice and palliative care providers to share recent news and helpful links.

“No matter what you're going through, there's a light at the end of the tunnel.”

– Demi Lovato

Policy Update

CMS Medical Review Audits to Resume in August

In their [July 2020 COVID-19 Provider Burden Relief FAQs](#) document, CMS reported that they “expect to discontinue exercising enforcement discretion beginning on August 3, 2020, regardless of the status of the public health emergency.” This includes pre-payment TPE reviews and post-payment reviews conducted by the MACs, Supplemental Medical Review Contractor (SMRC) reviews and Recovery Audit Contractors (RAC). If selected for medical review, providers should discuss with their MAC any COVID-19-related hardships potentially affecting audit response timeliness. All reviews will be conducted according to statutory and regulatory provisions and related billing and coding requirements. For those claims potentially selected for medical review, waivers and flexibilities in place during these service dates will be applied for any claims potentially selected for medical review.

Independent Commission Formed to Address Safety and Quality in Nursing Homes – **Your Comments Needed**

As the Update reported earlier this summer, an Independent Commission to Address Safety and Quality in Nursing Homes has been formed with [25 commission members](#). The Commission is requesting public comments to improve care delivery during an emergency and prevent the spread of COVID-19 and other infectious diseases in nursing homes. Hospice and palliative care providers are encouraged to submit comments. **Comments must be submitted by 5:00 pm ET on Friday July 17.** Note that the comments must be submitted [online by using this link](#).

Since late April, the Commission has been meeting regularly with a focus on the following tasks:

1. Identify best practices for facilities to enable rapid and effective identification and mitigation of transmission of COVID-19 and other infectious diseases in nursing homes.
2. Recommend best practices as exemplars of rigorous infection control practices and facility resiliency that can serve as a framework for enhanced oversight and quality monitoring activities.
3. Endeavor to identify best practices for improved care delivery and responsiveness to the needs of all nursing home residents in preparation for, during, and following an emergency.
4. Leverage new sources of data to improve existing infection control policies and enable coordination across federal surveyors, contractors, and state and local entities to mitigate coronavirus infection and future emergencies.

By far one of the most challenging aspects of providing hospice care during the COVID-19 Public Health Emergency (PHE) has been gaining access to patients who are residing in nursing facilities. Hospices have experienced a number of barriers to providing care, including refusal of facilities to admit hospice caregiving staff into facilities, concerns about telehealth visits, and forced discharge from the hospice benefit for COVID-19 patients as facilities use the 1135 waiver waiving the 3 day qualifying hospital stay to access the Medicare skilled nursing benefit.

NHPCO has gathered information, experience and feedback from hospice providers about the hospice/nursing home issues during COVID-19 and will be submitting comments this week. We urge hospice providers to also submit comments.

Resources

HHS Releases May and June COVID-19 State Testing Plans

The US Department of Health and Human Services made May and June [COVID-19 Testing Plans](#) from all states, territories, and localities publicly available on HHS.gov. The State Testing Plans serve as a roadmap for each state's 2019 testing strategy for SARS-CoV-2, the virus that causes COVID-19. The plans include details on response to surge cases and how to reach vulnerable populations including minorities, immunocompromised individuals and older adults.

Key Considerations for Transferring Patients to Relief Healthcare Facilities when Responding to Community Transmission of COVID-19 in the U.S.

CDC updated key [considerations for states and healthcare systems to consider strategies for transferring patients, staff, and supplies between health facilities](#) to optimize patient care, balance resources, and minimize use of crisis care standards. One option is the identification of relief healthcare facilities and establishing or coordinating with existing federal, state, or regional Medical Operation Coordination Cells (MOCC). The implementation of the elements highlighted in this guidance can be found in the Federal MOCC Toolkit reference throughout.

Articles of Interest

- [“Death, Dying, and Dignity in the Time of the COVID-19 Pandemic,”](#) *Journal of Palliative Medicine*.
- [“Voices from the Frontlines: Social Workers Confront the COVID-19 Pandemic,”](#) *Oxford Academic*.
- [“Virtual Grieving: When Pandemic Death Stares Us In The Face,”](#) *Forbes*.

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2020 Virtual Conference

There is still time to register for the [2020 Virtual Conference](#), July 22 and 23. Presented by NHPCO, AAHPM, and HPNA, the focus is on quality and conference faculty will address the realities of COVID-19 in their presentations. Register by Friday before the registration fee goes up!