

**Medicare Hospice Conditions of Participation
Volunteer 5% Cost Savings Match Information Sheet**

A Resource for Volunteer Managers
Reviewed June 2021

Calculation of Match:

$$\frac{\text{Volunteer Patient Care and Administrative Volunteer Hours}}{\text{Direct Paid Staff Patient Care Hours (Includes staff employed by hospice organization directly and contracted staff)}} = \% \text{ Volunteer Time}$$

Numerator: Direct Volunteer Patient Care Hours and Administrative Volunteer Hours include total direct patient care and administrative volunteer hours or total volunteer hours.

Definition: All hands-on direct time with the patient and family or hospice survivor, including:

1. Telephone calls to patient, family, or survivor
2. Travel time to patient homes, if travel time is also used in the calculation for staff hours
3. Time spent receiving orientation to a specific patient, e.g., receiving infection control procedures during an introductory visit with a patient or learning comfort measures for the patient in his or her home
4. Volunteers must be trained to defined organizational standards
Example: A fully screened/trained volunteer performing a task for a patient would count. A community group, untrained but donating time to do a 1x specialty task would not.

Examples of volunteer hours that can be counted toward the 5% Medicare match:

1. **Direct patient care hours, including:**
 - a. In-home/in-person family time
 - b. Telephone contact
 - c. Art at the bedside for individual patients
 - d. Music at the bedside for individual patients
 - e. Companionship
 - f. Transportation, e.g., doctor visits, shopping, errands
 - g. Respite
 - h. Pet Therapy for individual patients
 - i. Companion vigils (11th hour volunteers)

- j. Life review and life history

2. Direct bereavement support hours, including:

- a. In-home/in-person family time
- b. Telephone contact
- c. Composing bereavement notes

3. Administrative hours, including:

- a. Filing, auditing, and copying
- b. Data entry of records
- c. Developing and packaging patient information packets
- d. Time volunteer is being trained to perform a particular administrative task (clerical duties in the office)

4. Travel time for volunteers, if travel time is also used in the calculation for staff hours

Examples of volunteer hours that cannot be counted toward the 5% Medicare match:

- 1. Sewing, stitching, and quilting
- 2. Flower arranging
- 3. Craft projects, such as making greeting cards, e.g., bereavement, sympathy, and birthday cards
- 4. Singing at hospice inpatient units
- 5. Fundraising
- 6. Participation in organization's governing board
- 7. Thrift shops
- 8. General volunteer training hours, not specific to a patient or administrative task
- 9. Community group activities when the groups are not trained as official hospice volunteers at your agency
- 10. Community Outreach Events

Denominator: Direct Paid Staff Patient Care Hours include total patient care hours of all paid hospice employees and contracted staff.

Definition: All hands-on direct time with the patient and family or hospice survivor, including:

- 1. Telephone calls to patient, family, or survivor
- 2. If travel time for direct patient care staff is counted, travel time can also be counted for volunteers in the calculation for volunteer hours.
- 3. IDG time and staff education time is **not** counted
- 4. Examples of staff to include in the calculation of direct staff patient care hours (additional staff may be added to this list):
 - a. Nurse
 - b. Social Worker
 - c. Physician
 - d. Chaplain
 - e. Hospice Aide
 - f. Physical Therapist
 - g. Bereavement Counselor

Volunteer Training Hours

CMS has provided guidance on volunteer training hours, stating that volunteer training hours or ongoing inservice/annual education hours would NOT count toward the 5% match for cost savings. The note is found in the preamble to the [Medicare Hospice Conditions of Participation](#) published in the Federal Register on June 5, 2008.

The specific section of the June preamble related to this topic (pages 32133-32134) reads:

Comment: Some commenters asked us to clarify that volunteer time spent in training, orientation, travel, direct patient care, and administrative services may be included when documenting the cost savings that the hospice achieves through the use of volunteers.

Response: Section 1861(dd)(2)(E)(ii) of the Act requires hospices to maintain records on the cost savings achieved through the use of volunteers. That is, hospices must document those hours that volunteers furnished care and services for which a hospice would otherwise have been required to pay its employees to furnish such care and services. If a hospice is training and orienting volunteers, it is most likely using its paid employees to do so. Therefore, no cost savings is achieved. However, if a hospice does pay an employee for time spent traveling for direct patient care and administrative purposes, and does not compensate a volunteer for the time, then it may include the volunteer's travel time, direct patient care and administrative services in its documentation of the cost savings it achieves. Likewise, hospices may document the time that volunteers actually spend providing direct patient care and administrative services, because hospices would compensate paid employees for the time spent performing these duties. We note that travel time is not the same as direct patient care. Following publication of this final rule, we will issue further sub-regulatory guidance addressing the manner in which the cost savings needs to be calculated and documented.

An up-to-date listing of all Medicare regulations for hospice can be found in the Electronic Code of Federal Regulations at [42 CFR 418](#).

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