



Are You Compliant?

Companion to the Medicare Hospice Conditions of Participation Resource Series

CMS Final Medicare Hospice Interpretive Guidelines State Operations Manual, Appendix M October 1, 2010

Guidance to Surveyors – Hospice

Sec. 418.78 Condition of Participation: Volunteers

L641	§418.78 Condition of Participation: Volunteers	Guidance to Surveyors
L642	<p>§418.78 Condition of Participation: Volunteers</p> <p>The hospice must use volunteers to the extent specified in paragraph (e) of this section. These volunteers must be used in defined roles and under the supervision of a designated hospice employee.</p>	<p>Interpretive Guidelines §418.78</p> <p>Volunteers are considered hospice employees to facilitate compliance with the core services requirement.</p> <p>Procedures and Probes §418.78</p> <p>Conduct an interview with the individual designated to supervise the volunteers regarding the use, training and supervision of volunteers.</p>
L643	<p>§418.78(a) Standard: Training</p> <p>The hospice must maintain, document and provide volunteer orientation and training that is consistent with hospice industry standards.</p>	<p>Interpretive Guidelines §418.78(a)</p> <p>All required volunteer training should be consistent with the specific tasks that volunteers perform.</p> <p>Probes §418.78(a)</p> <ul style="list-style-type: none"> • How does the hospice supervise the volunteers? Is there evidence that all volunteers receive the supervision necessary to perform their assignments? • Is there documentation supporting that all the volunteers have received training or orientation before being assigned to a patient/family? • What evidence is there that the volunteers are aware of: <ul style="list-style-type: none"> – Their duties and responsibilities;

Source: Source: Department of Health and Human Services (DHHS) Centers for Medicare & Medicaid Services (CMS) Pub. 100-07 State Operations Manual, Transmittal 65, Appendix M, “Guidance to Surveyors, Hospices” October 1, 2010.

		<ul style="list-style-type: none"> – The person(s) to whom they report; – The person(s) to contact if they need assistance and instructions regarding the performance of their duties and responsibilities; – Hospice goals, services and philosophy; – Confidentiality and protection of the patient's and family's rights; – Family dynamics, coping mechanisms and psychological issues surrounding terminal illness, death and bereavement; – Procedures to be followed in an emergency, or following the death of the patient; and – Guidance related specifically to individual responsibilities.
L644	<p>§418.78(b) Standard: Role</p> <p>Volunteers must be used in day-to-day administrative and/or direct patient care roles.</p>	<p>Interpretive Guidelines §418.78(b)</p> <p>Qualified volunteers who provide professional services for the hospice must meet all requirements associated with their specialty area. If licensure or registration is required by the State, the volunteer must be licensed or registered.</p> <p>The hospice may use volunteers 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 described in standard (e).</p> <p>The duties of volunteers used in direct patient care services or helping patients and families must be evident in the patient's plan of care. There should be documentation of time spent and the services provided by volunteers.</p> <p>Probes §418.78(b)</p> <p>What evidence exists that the IDG conducts an assessment of the patient/family's need for a volunteer?</p>
L645	<p>§418.78(c) Standard: Recruiting and retaining</p> <p>The hospice must document and demonstrate viable and ongoing efforts to recruit and retain volunteers.</p>	
L646	<p>§418.78(d) Standard: Cost saving</p> <p>The hospice must document the cost savings achieved through the use of volunteers. Documentation must include the following:</p> <ol style="list-style-type: none"> (1) The identification of each position that is occupied by a volunteer. (2) The work time spent by volunteers occupying those 	<p>Interpretive Guidelines §418.78(d)</p> <p>There is no requirement for what the cost savings must be, only on how it is computed.</p>

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	<p>positions.</p> <p>(3) Estimates of the dollar costs that the hospice would have incurred if paid employees occupied the positions identified in paragraph (d)(1) of this section for the amount of time specified in paragraph (d)(2) of this section.</p>	
L647	<p>§418.78(e) Standard: Level of activity</p> <p>Volunteers must provide day-to-day administrative and/or direct patient care services in an amount that, at a minimum, equals 5 percent of the total patient care hours of all paid hospice employees and contract staff. The hospice must maintain records on the use of volunteers for patient care and administrative services, including the type of services and time worked.</p>	<p>Interpretive Guidelines §418.78(e)</p> <p>In computing this level of activity, the hospice divides the number of hours that hospice volunteers spent providing administrative and/or direct patient care services by the total number of patient care hours of all paid hospice employees and contract staff. For example, if the hospice provides 10,000 hours of paid direct patient care during a one-year period the hospice must provide 500 volunteer hours in direct patient care or administrative activities to meet the required 5 percent total.</p> <p>A hospice may fluctuate the volume of care provided by volunteers after the hospice meets the required 5 percent minimum.</p>

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