

MCCM Guidance: Portal Documentation of Comprehensive Assessments

Background

One of the central goals of the Medicare Care Choice Model (MCCM) is to improve the quality of health care provided to individuals who have a serious illness. To monitor and evaluate progress toward this goal, MCCM captures data through the MCCM Portal (Portal) on a set of quality measures. The quality measures pertain to areas such as symptom management (e.g., pain and shortness of breath), advance care planning, and acute care utilization. In order to accurately assess quality of care, it is critical that data are collected in a consistent and uniform method. Therefore, the purpose of this guidance is to clarify for hospices when to use the response ‘initial assessment’, ‘comprehensive assessment’, or ‘subsequent comprehensive assessment’ in the Service and Activity Log (SAL) on the Portal.

It is important to note that the Portal contains a subset of information that is collected for the purposes of monitoring and evaluation, and is not intended to be an exact duplicate of the hospice’s complete clinical record. Portal items were very carefully selected to provide the information needed for evaluating the impact of MCCM while minimizing data entry burden for participating hospices.

Item #10 (“What MCCM service or activity occurred?”) on the SAL contains responses that refer to the three specified formal assessments delineated in the hospice Conditions of Participation (CoPs) at 42 CFR §418.54 — namely the initial assessment (on the Portal: “48-hour Initial Assessment”), the first comprehensive assessment (on the Portal: “Comprehensive Assessment within 5 days of Admission”), and subsequent comprehensive assessment (updated no less than every 15 days or as the condition of the patient requires; on the Portal: “Subsequent Comprehensive Assessment”). This is summarized in the below table and further described in the remainder of this guidance document. Only SALs that are submitted in accordance with these guidelines will be used to determine performance on MCCM quality metrics.

MCCM Required Assessments and How to Complete Portal Documentation

CoP Requirement	Portal Item #10	Who Should Submit the SAL for this Assessment	When Should the Assessment be Completed?
Initial Assessment	48-hour Initial Assessment	Hospice Registered Nurse (RN) or MCCM RN Care Coordinator (MCCM RN CC)	Within 48 hours of enrollment to MCCM <i>Note: This assessment is not required if the Comprehensive Assessment is completed within 48 hours of enrollment.</i>
Comprehensive Assessment	Comprehensive Assessment within 5 days of Admission	Hospice RN or MCCM RN CC	Within 5 days of enrollment to MCCM
Update of the Comprehensive Assessment	Subsequent Comprehensive Assessment	Hospice RN or Licensed Practical Nurse (LPN) or MCCM RN CC	Every 15 days after first comprehensive assessment

1. Documenting the Initial Assessment

The hospice RN or MCCM RN CC must complete an initial assessment within 48 hours after a patient elects MCCM. The hospice RN or MCCM RN CC must document this initial assessment using a Portal SAL and selecting “48-hour Initial Assessment” for Item #10 “What MCCM service or activity occurred?” When completing the SAL for the Initial Assessment, the hospice RN or MCCM RN CC must ensure that all questions that appear on the SAL are completed, including any quality measures.

Important Note: The Initial Assessment is *only required* if the first comprehensive assessment for the patient does not occur within the first 48 hours. If the first comprehensive assessment is completed within 48 hours of admission to MCCM, the hospice RN or MCCM RN CC must *only* submit a SAL for a Comprehensive Assessment within 5 days of Admission.

2. Documenting the First Comprehensive Assessment

The hospice RN or MCCM RN CC must lead the hospice's interdisciplinary group (IDG) to complete a comprehensive assessment within 5 days after a patient elects MCCM. The hospice RN or MCCM RN CC must document this first comprehensive assessment using a Portal SAL and selecting "Comprehensive Assessment within 5 days of Admission" for Item #10 "What MCCM service or activity occurred?" The MCCM RN CC or hospice RN must ensure that the SAL he/she submits for the first comprehensive assessment reflects the input of all IDG members.

Important Note: The first comprehensive assessment must be completed within 5 days of admission to MCCM. Completion of an initial assessment within 48 hours *does not* eliminate the need to complete a SAL for the comprehensive assessment within 5 days of admission.

3. Documenting Updates of the Comprehensive Assessment

The hospice IDG must update the comprehensive assessment as frequently as the condition of the patient requires, but no less frequently than every 15 days. The update(s) to the comprehensive assessment must be documented using a Portal SAL and selecting "Subsequent Comprehensive Assessment" for Item #10 "What MCCM service or activity occurred?" Updates to the comprehensive assessment must be submitted by the hospice RN, MCCM RN CC, or a hospice LPN. The MCCM RN CC or hospice RN must ensure that the SAL he/she submits for the subsequent comprehensive assessment(s) reflects the input of all IDG members.

Important Note: Subsequent comprehensive assessments must be completed no less frequently than every 15 days. However, in some circumstances, patients may decline a subsequent comprehensive assessment. The hospice must respect patient preferences as to the frequency of assessment and document patient preferences in the hospice's complete clinical record.

4. Documenting the Participation of Other Staff for Initial and Comprehensive Assessments

Any staff member other than the hospice RN or MCCM RN CC who participates in an initial or comprehensive assessment may complete a SAL by selecting the appropriate response for item #10. However, these submissions only require quality assessment responses in selected circumstances (e.g., for social workers to describe psychological/emotional needs). Any responses to questions that appear and are answered by staff other than the hospice RN or MCCM RN CC are only intended to serve as supplementary information for evaluation and monitoring purposes and do not replace or supplant the requirement that the MCCM RN CC or Hospice RN complete all quality items on the SAL.

5. Documenting Assessments that are *not* one of the assessments required by hospice CoPs

In addition to the above three assessment types, hospice staff may also conduct interim, focused assessments when providing other services (nutritional, chaplain, bereavement, etc.). For those interim, focused assessments, use the appropriate service under item #10 of the SAL.