

BQC - 89 - 041

Date: May 19, 1989

To: All Certified Wisconsin Hospices
Hospice Organization of Wisconsin

From: Larry Tainter, Director
Bureau of Quality Assurance

Subject: Outlying Hospice Sites

The Bureau of Quality Compliance has received the attached copy of a memo from Wayne Smith, Director, Office of Survey and Certification, Health Care Financing Administration, (HCFA) Baltimore, to Dorothy Burk Collins, Associate Regional Administrator, Region V, HCFA, Chicago. The letter contains answers to questions raised regarding outlying hospice sites ("branches"), hospices with sites that cross state lines, and employment of staff at outlying sites.

In essence this memorandum indicates that:

1. Outlying hospice sites must provide services according to the federal hospice Conditions of Participation or the hospice overall is out of compliance.
2. No criteria has been established regarding distance of outlying sites from the parent hospice. However, if a hospice operates an outlying site that has separate professional staff, patient load, hospice inpatient site, medical director or separate clinical records, it may need to be certified separately as a Medicare hospice.
3. Hospices may have outlying sites across state lines, but non-compliance with the Conditions of Participation at these sites shall be cited against the parent hospice.
4. Hospices may not use staff at an outlying site that are actually employed by another health organization. Contracted staff may be used to supplement hospice staff not replace them. Core services must be provided by hospice employees.
5. State agency surveyors must consider outlying sites in their survey process. If state surveyors have concerns regarding compliance at the outlying sites, they should make home visits to the hospice's patients.

I hope this letter will clear up some of the confusion that has surrounded this issue. If you have any questions, please contact Allan Stegemann at (608) 266-2055.

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enc.

cc: Allan Stegemann
George F. MacKenzie