FREE WEBINAR

HOPE and iQIES, 1 Month Later

From Launch to Lasting Compliance

THU, NOV 6 | 1 PM CT







TODAY'S SPEAKERS



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SAM

PATE

Senior Client Dev. Rep. - Simple





Agenda



- Takeaways from the first month of HOPE
- Common submission risks & tips for success
- Impact of HOPE transition on CMS reports
- New QMs & potential reimbursement changes
- iQIES access & registration



POLL 1

Does your agency experience any issues with HOPE submissions?

- Yes issues have been resolved
- Yes issues are still ongoing
- No everything has been smooth sailing

If you did experience issues with your HOPE submission, what was the primary concern?

- Correcting or exporting HOPE files from EHR/EMR
- Submitting HOPE assessments to CMS
- Verifying submission status or feedback
- Something else



What we learned in the first 30 days







115,807: HOPE assessments scrubbed in Simple



16,151: HOPE assessments submitted from Simple

99% acceptance rate | Some issues to mismatch in patient identification (usually just a typo)



40.2%: Scrubbed assessments with a warning or critical error

Errors caught before submission to CMS



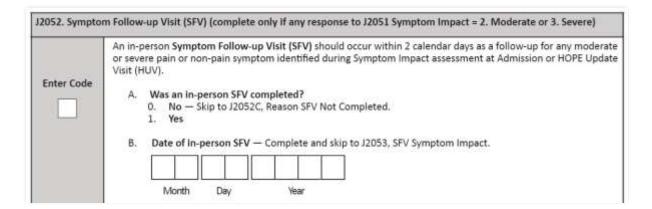
Most common HOPE error in Simple

Inconsistent SFV Items

Rule 3108:

If any J2051 symptom impact is marked as Moderate or Severe (2 or 3), then J2052A (SFV) cannot be blank.

This is critical error (causes rejection)



In other words...

- If a patient reports moderate or severe pain, shortness of breath, fatigue, etc →
 CMS expects the provider to document whether a follow-up visit occurred.
- Leaving J2052A blank triggers error 3108 essentially: "You said symptoms were moderate or severe, so tell us what you did about it."



Most common HOPE error in Simple

Inconsistent SFV Items

Why does this matter?

- Regulatory impact: This directly feeds into new Hospice QMs that begin public reporting in CY2026. Missing or blank SFV fields will negatively impact compliance and quality scores.
- Survey readiness: Consistent documentation shows that hospices are acknowledging and responding to patient needs — a key survey focus area.
- Data integrity: Prevents incomplete records being transmitted to iQIES, which could result in rejected submissions or inaccurate quality reporting.



Most common HOPE error in Simple

Inconsistent SFV Items

Why are Simple clients seeing Rule 3108 so often?

- Since the SFV is a separate visit, sometimes that assessment is scrubbed before the SFV is completed or before the SFV data is included on the ADM/HUV.
- Some EHR workflows separate ADM or HUV documentation from SFV documentation since it's a separate visit, which makes the timing confusing.
 - The J2051 responses are entered at admission, while the SFV is documented 1–2 days later.



SFVs are one of the more logistically complicated aspects of HOPE – yet so important for the new QMs. CMS has multiple related validation rules. Extra attention to this area is worth it.



Other HOPE error results

Based on 115,807 assessments scrubbed in Simple



Most Frequent Issues: Symptom Follow-Up Visit (SFV), Payer Information, Invalid Values, Date Formatting, Skin Conditions



Out of top 12 most frequent: 11 Critical, 1 Warning



Key Observations

- Data Integrity Issues: Invalid values and date formats are major contributors.
- Clinical Logic Errors: SFV and opioid-related inconsistencies suggest workflow or documentation gaps.
- Demographic Completeness: Race and ethnicity errors indicate missing required fields.
- **Skin Condition Logic:** Two separate rules for skin conditions show frequent misalignment in new HOPE items.



Expect more change/clarification from CMS

Regulation/guidance can continue evolving after major regulatory updates. Example:

Simple asked CMS to clarify the coding instructions for A1400 Payer Information

- We spotted a potential contradiction between HOPE Guidance Manual and a HOPE Technical Specifications/iQIES error message
 - HOPE Guidance Manual v1.01 states "If the patient had Part C/Medicare Advantage prior to enrolling in hospice, select the response options for BOTH Part C and traditional fee-for-service Medicare or Medicaid, as applicable."
 - However, the **CMS Fatal Edit -3083** in the iQIES HOPE Error Message Reference Guide states: "If A1400A (Payer: Medicare (FFS) = [1], then A1400B (Payer: Medicare (managed care/Part C/Mcr Advant.) must equal [0]."



Question will be escalated within CMS after government shutdown is over

For now, follow the CMS technical specs (Simple's scrubber rule will validate by those specs)

Leave A1400B unchecked with A1400A is checked



Navigating HOPE with your EHR

Major regulatory updates are complicated and can impact EHR workflows in a big way – this may be ongoing for your agency

- File export issues: Some agencies reported issues with their EHR systems editing or exporting HOPE assessments
- SFV management: EHRs handle the documentation and scheduling for SFVs differently make sure you have the visibility you need for accurate/timely completion



Consider a comprehensive HOPE scrubber to ensure backup for accuracy and easier review for documentation errors/inconsistencies



CMS & iQIES submission risks





POLL 2

Have you submitted any HOPE assessments yet?

- Fewer than 10 submissions
- More than 10 submissions
- No, we haven't had a deadline yet
- No, and we missed a submission deadline. Help!



iQIES Submission Risks



8,500+ providers have used Simple to submit over 80 million assessments to CMS (over 20 million through iQIES since 2023) – we know these risks well



Compliance with submission threshold

- Dropping below the 90% on-time submission threshold = 4% payment penalty
- Make sure you track submission deadlines somewhere iQIES does not show this



Turnover – maintain submission capability & SO access

- Selection of Security Official (SO) is important Corporate Level vs Agency Level (or both)
- Consider having more than 1 SO (aka PSO)



New Final Validation Report process

- Final Validation reports are now released through iQIES
- So important to review these reports make sure you are viewing the full detail version



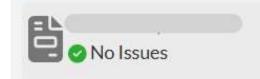
Submission deadlines



- Track of submission deadlines to help avoid close calls/missed submissions
 - 30 days from the corresponding timepoint with no errors
- How aware are you right now of how many assessments are close to late?
 Can you find that information quickly?
 - Keeping track of that manually can be a cognitive overload

SimpleConnect™

Automatically track submission deadline for each assessment in the application



Z0500B: 10/13/2025 6 day(s) left to transmit. ARD: 10/11/2025 Reason: (HUV) HUV1



Have a backup plan for submissions



- What happens if the person who does submissions isn't available?
 - Leaves the company
 - Goes on leave, vacation or sick day
 - Doesn't have internet or other unexpected issue
- When you are planning your backup options, keep in mind that iQIES login required for submissions – unless you use a submission tool

SimpleConnect™

Unlimited users, easy-to-learn submission process – no need for an iQIES account





New Final Validation process

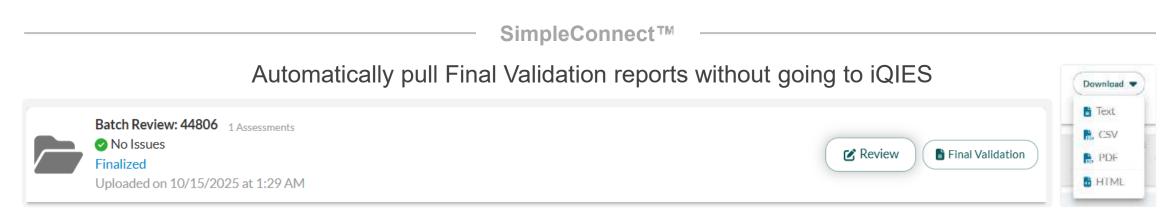


HOPE Final Validation reports are released through iQIES

Highly manual process to download but visibility is essential

Best practice: check all Final Validation Reports

- Very important during a major regulatory update so that you are on the same page as CMS
- CMS may accept your submission but still flag other errors on the FV report
 - Example: Missing SFV data when an SFV was triggered on that assessment
- Non-compliance flags can lead to audits even if submissions are being accepted





Why does HOPE accuracy matter?





Importance of a HOPE scrubber

- Most EHRs check some of the basic CMS validation rules but do not run a comprehensive check for errors and documentation inconsistencies
- With potential VBP models coming for hospice the inconsistencies matter just as much as the fatal errors
 - → Documentation inconsistencies can lead to inaccurate reimbursement



Especially Symptom Follow-Up Visits (SFVs)

• This is the time to identify gaps in scheduling/completion so that your data is as accurate as possible during CY2026 collection for public ratings



What can happen when assessments aren't accurate?



Rejected submissions (potentially leading to late submissions)



Revenue penalties if under 90% submission compliance

4% APU penalty for hospice



Clinical/coding audits | Targeted Probe & Educate (TPE) audits



Inaccurate VBP payment adjustments

• Is this on the way for hospice???

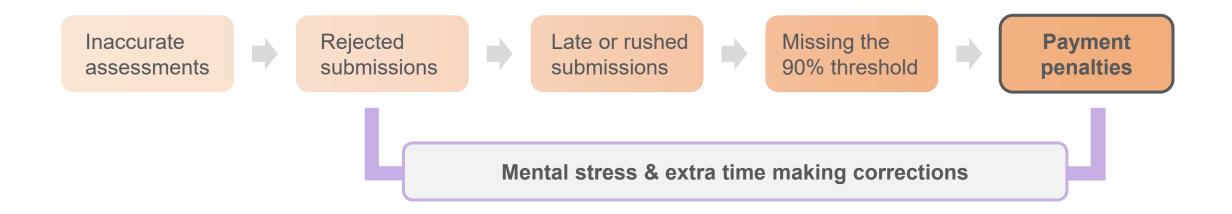


Negative impact on care planning





Rejected submissions



If you don't have thorough, reliable insights into fatal errors (CMS validation rules) today – consider options for assessment validation/scrubbing before submission



SimpleConnect™ checks each assessment against all CMS validation rules for fatal errors





Revenue penalties

Hospice agencies face an 4% Annual Payment Update (APU) penalty if they fail to meet Quality Reporting Program (QRP) requirement of timely submission and acceptance of assessments | Submit 90% of required data by 30-day deadline

- Deadline: 30 days from assessment completion date or timepoint (admission/discharge) date
 - Ex: HOPE ADM due 30 days after admission date, HUV due 30 days after HUV date
 - OASIS ADM due 30 days after assessment completion date
 - Know your assessment types & submit early
- Submissions must be received on time in iQIES free of errors (timeliness is determined by receipt date if the assessment is validated)
- Agencies should still submit assessments that would be late





- Is HOPE leading to change in hospice payments?
 - Similar to OASIS, HOPE captures more patient-specific, detailed data
 - HOPE data will add more insight into current and new QMs this may eventually be tied to payments



- It's in the name... "HOPE: Hospice Outcomes and Patient Evaluation" =
 greater focus on care quality and patient outcomes → likely tied to
 reimbursement in a future VBP model
- Start adapting/embracing now and pay attention to data accuracy so you're ahead of the curve when this anticipated payment update comes
- At the very least, accuracy matters now for QMs & public ratings



Impact on care planning

 Inconsistencies in assessments, inaccurate coding, lack of detail in notes, etc can have a negative impact on care planning

Accurate assessments = better care plans = better care = better outcomes = better ratings = better reimbursement/revenue

SimpleConnect™

Use scrubber results to catch/fix errors, but also create feedback loop and set goals Ex: "We are missing this QM criteria, let's focus there"





New HOPE visits & CMS reports





Hospice Outcomes & Patient Evaluation (HOPE)



AS OF OCTOBER 1, 2025...

HOPE timepoints required for all patients admitted after 10/1

Any admissions (HIS) prior to 10/1 must be submitted via QIES

- For existing patients admitted prior to 10/1, the only HOPE timepoint required is the HOPE-Discharge – HUVs are not required in this case
- All HOPE assessments are submitted through iQIES



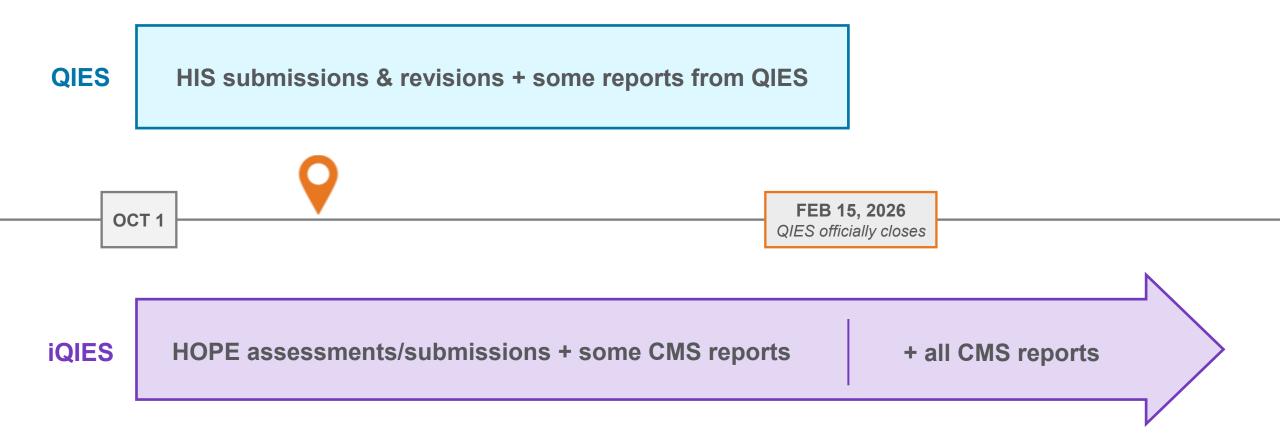
Your CMS reports are moving...



- *Per CMS: Providers will continue to access some reports in QIES through February 2026, including the following:
 - Hospice Review and Correct Report, Hospice-Level Quality Measure Report, Hospice Patient-Level Quality Measure Report, Hospice Provider Preview Reports (November 2025 and February 2026 reports), Hospice CAHPs Provider Preview Reports (November 2025 and February 2026 reports), FY2026 Non-compliance Notification Letter
- CMS plans a phased migration of the QM reports from CASPER into iQIES beginning in February 2026 / some already in iQIES
- NOTE: <u>PEPPER website is restored</u> but under construction we're hearing that
 CMS may be releasing some reports by end of the year

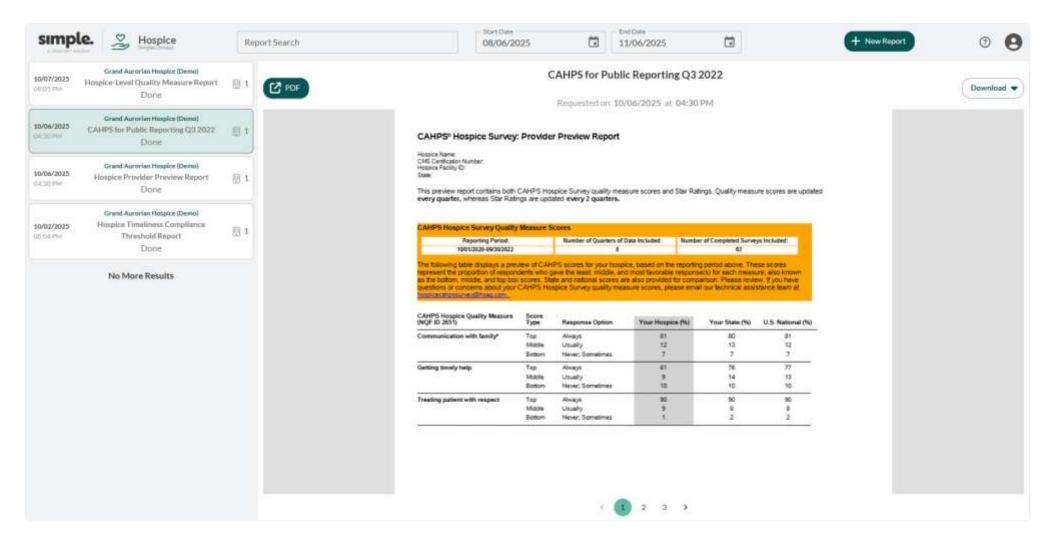


HIS to HOPE Transition Timeline





Retrieve CMS reports any time – without logging into QIES or iQIES





HOPE Timepoints & Timelines

| HOPE Timepoint | Date | | Record Completion Goal | Record Submission Deadline | |
|-------------------|---------------------------------------|---|---|---|--|
| Admission | Admission Date A0220 | Within 5 days of admission | No later than the Admission Date A0220 + 14 days | No later than the Admission Date A0220 + 30 days | |
| HUV 1 | 1 1 1 1 1 1 1 1 1 1 | | No later than the HUV1 Date Z0350 + 14 days | No later than the HUV1 Date Z0350 + 30 days | |
| HUV 2 | HUV2 Date Z0350 | On or btw day 16 No later than the HUV2 Date and 30 Z0350 + 14 days | | No later than the HUV2 Date Z0350 + 30 days | |
| Discharge | Discharge Date A0270 | At the time of discharge | No later than DC Date A0270 + 7 days | No later than DC Date A0270 + 30 days | |

Symptom Follow-up Visit (SFV) can be triggered on ADM, HUV 1 or HUV 2:

- SFV is triggered as a follow-up for any pain or non-pain symptom impact rated as moderate or severe on J2051
- SFV requires: an in-person visit, within 2 calendar days (can be on the same day as ADM or HUV)
- **SFV is a separate visit from the ADM or HUV embedded in the assessment NOT A SEPARATE TIMEPOINT
- SFVs items may be completed by either an RN or LPN/LVN



Symptom Follow-up Visit (SFV) Timepoint



- Tracking Symptom Follow-up Visits (SFVs) is very important
- Have a strong plan/process in place to track and manage...
 - When SFVs are triggered in Admissions or HUVs
 - Timely scheduling & completion of SFVs
 - Submission of the SFV embedded in the ADM or HUV
- Two new hospice quality measures are tied to timely completion of the SFVs

Create a process for tracking SFVs using all your resources – EHR, internal communication methods & other tools (& check for documentation inconsistencies)



Use SimpleConnect™ to double-check that SFVs are completed when they are required



Example HOPE Calendar – Admission, HUVs & SFVs

| | MONDAY | TUESDAY | WEDNESDAY | THURSDAY | FRIDAY | SATURDAY | SUNDAY | | | |
|----------|-----------------------------------|--------------------------------|--|----------------|-----------------------------------|---------------------|----------------|--|--|--|
| | | | RN Initial Visit Admission Date A0220 = Day 0 | 2 | 3 SFV Completed | Admission completed | 5 | | | |
| | 6 Nurse Visit | 7 | 8 | 9 | 10 | 11 | 12 | | | |
| <u>~</u> | | | | | | | | | | |
| OCTOBE | 13 | 14 HUV 1 Visit | 15 | 16 | 17 Nurse Visit | 18 | 19 | | | |
| | HUV 1 Window (Days 6 through 15) | | | | HUV 2 Window (Days 16 through 30) | | | | | |
| | 20 | 21 | 22 | 23 HUV 2 Visit | SFV Completed | 25 Nurse Visit | 26 Nurse Visit | | | |
| | HUV 2 Window (Days 16 through 30) | | | | | | | | | |
| | Nurse Visit | Patient Died HOPE DC completed | 29 | 30 | 31 | 1 | 2 | | | |
| | HUV 2 Window (Days 16 through 30) | | | | | | | | | |

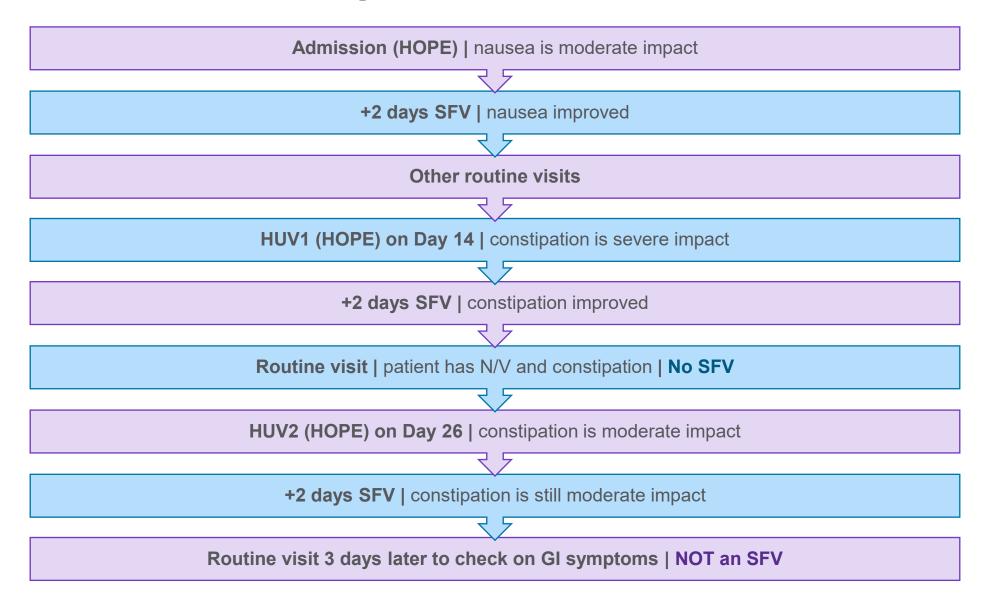


Example HOPE Calendar – Admission, HUVs & SFVs





Example HOPE Visit Schedule





Example HOPE Calendar – Admission, HUVs & SFVs





New hospice Quality Measures (QMs)



Two new hospice QMs are tied to timely completion of the SFVs

Timely Follow-up for Pain Impact: % of assessments with a follow-up visit within 2 days after moderate/severe pain is identified

Timely Follow-up for Non-Pain Symptom Impact: % of assessments with a follow-up visit within 2 days after moderate/severe non-pain symptoms (e.g., SOB, anxiety, nausea) are identified

- Data Collection: CMS will collect and analyze data from the four quarters of CY 2026 to determine reporting decisions
- Reporting Timeline: Preview reports potentially summer of 2027, public HQRP reporting beginning no sooner than FY 2028 (Nov 2027)
- HQRP Impact: Outcome focus, potential ties to value-based models; influences public ratings, reimbursement, and public reporting



New hospice Quality Measures (QMs): Part 2



Why is timely assessment/SFV submission is critical?

Late or missing assessments can:

- Reduce your denominator count
- Lead to suppressed scores
- Impact your public quality profile

Timely and complete submissions ensure:

- Accurate measure calculation
- Inclusion in national/state averages
- Better benchmarking and visibility

Best practices for providers:

- Review HOPE assessments regularly before submission
- Train staff on trigger items (J2051) and follow-up protocols to ensure timely completion
- Monitor submission timelines and data completeness



New hospice Quality Measures (QMs): Part 3

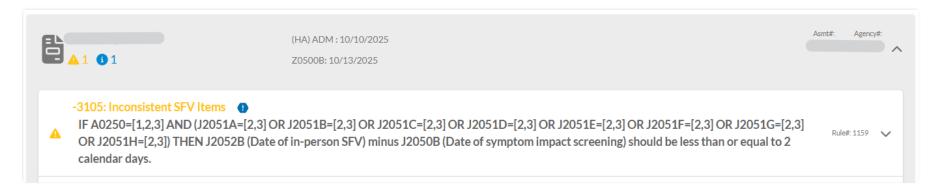


Smooth out the wrinkles in the SFV process now

2026 will be a full year of SFV data collection for public reporting

SimpleConnect™

Help ensure that SFVs are completed when they are required & identify inconsistencies in J2051/SFV responses



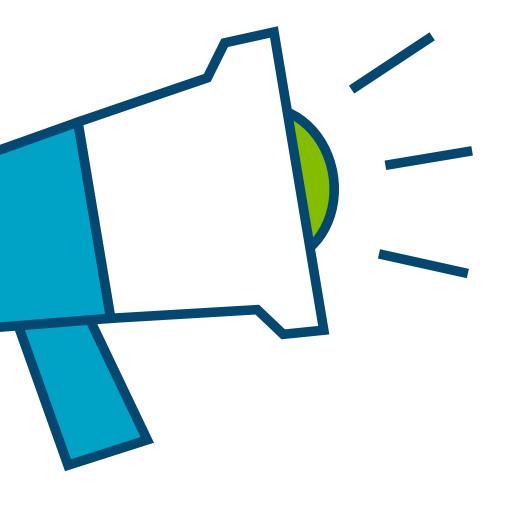


POLL 3

How well do you think your agency is doing in regard to SFVs and public reporting of the new QMs?

- Very confident we're well prepared
- Somewhat confident a few areas need work
- Not very confident still getting organized
- Unsure we could use some guidance





According to our industry contacts, as many as 40% of hospices still had not registered an iQIES account as of Oct. 1

Make sure you have iQIES access



iQIES registration & considerations





What is iQIES & why does it matter?



What is iQIES (Internet Quality Improvement & Evaluation System)?

- iQIES is an internet-based system that will be used for all submissions and communications to and from CMS
- Including hospice as of 10/1 (QIES remains open for submissions/reports until Feb 2026)

Official CMS iQIES manuals: https://qtso.cms.gov/software/iqies/reference-manuals

Every agency/corporation needs at least one Security Official (SO) in iQIES – also known as a Provider Security Official (PSO)



iQIES Registration



*Per CMS: Please note that failure to have access to iQIES means you cannot submit records and will be non-compliant

- Instructions for registering a PSO account via CMS QTSO site
- If your agency does not have a PSO yet, or if you are responsible for submitting data or pulling CMS reports... make sure you have an iQIES login

SimpleConnect™

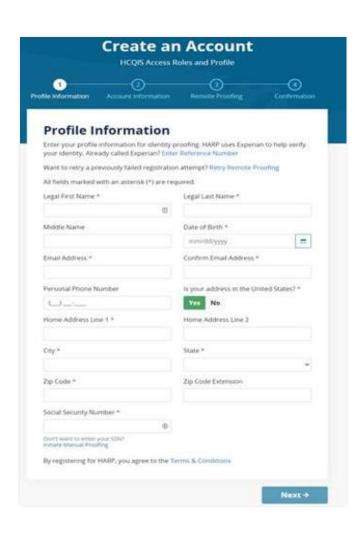
Unlimited users, easy-to-learn submission process – no need for an iQIES account





iQIES Registration





STEP 1 – (HARP)

- Register for a HARP account: https://harp.cms.gov/register
- Setup MFA (Multi-Factor Authentication)
- Complete the Identity Proofing

NOTE: Requires a time-consuming and complex security verification process

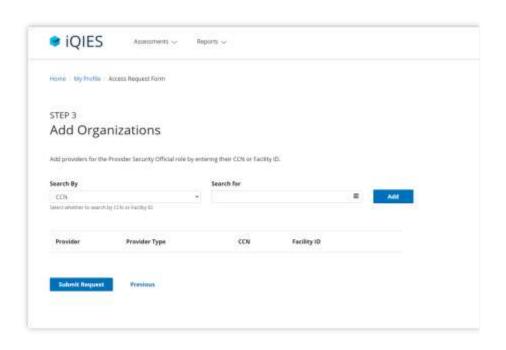
NOTE: May require a business domain email

People have reported issues registering with public email domains like @gmail.com, @yahoo.com



iQIES Registration





STEP 2 – (iQIES)

- Log into iQIES using HARP credentials
- Search by CCN and select Provider names

NOTE: Home Health users may already have HARP – request your hospice CCNs

NOTE: Set reminder to login to HARP/iQIES at least once every 60 days



iQIES Resources & Training from CMS



Creating a HARP Account Training Videos

iQIES Reference and Manuals Page

iQIES Training Videos Page

• iQIES News & Updates Page



CHOW process & iQIES





- 1. Old Operator > New Operator Communication Plan
- 2. New Operator Identifies and Requests PSO Access
- 3. Old Operator approves requests
- 4. New Operator (PSO) updates/manages access including Third Party Vendors



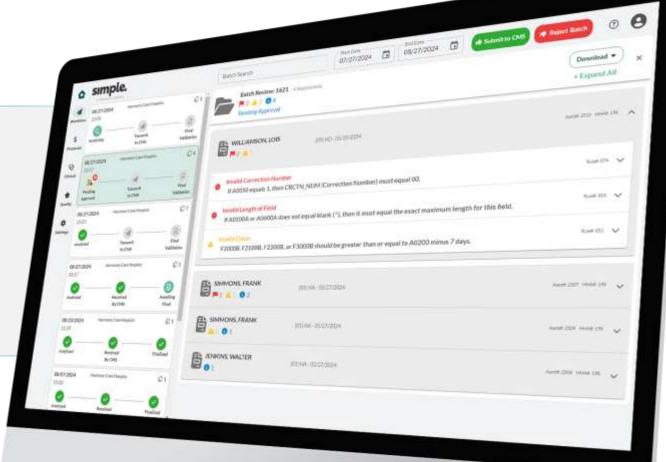
SimpleConnect™ for Hospice

One simple solution to scrub & submit HOPE files...

No matter which EHR/EMR you use.

Scrub & submit HOPE files without logging into iQIES

- + Identify fatal errors before submission
- + Catch documentation inconsistencies
- + Automatically retrieve final validations



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QUESTIONS

Recording and slides will be available: simple.health/blog



