



EDUCATIONAL RESOURCES

HOSPICE *Volunteer Requirements*

A Review of the Federal and State Regulations

OBJECTIVES

- Review the Condition of Participation pertaining to Volunteers
- Review commonly asked questions regarding volunteer services

THE VALUE OF HOSPICE VOLUNTEERS

- Hospice started as a grassroots, voluntary organization
- Medicare requires the use of volunteers for hospice programs that are Medicare certified
- NHPCO report (2010) hospice programs with higher levels of direct care volunteer involvement consistently report higher levels of care satisfaction
 - Hospice Compare

THE ROLES OF A HOSPICE VOLUNTEER

- Patient support
- Family respite support
- Bereavement support groups
- Administrative work
- Fundraising
- Special events or skills
- Act as a professional member of the IDT

REGULATION

- Medicare Conditions of Participation
 - Federal regulations in which all Medicare certified hospice providers must comply with in order to participate in the Medicare program and receive Medicare reimbursement
- State regulations
 - Individual state requirements that hospice providers must comply with in order to maintain their licensure
- Agency policy and procedure
 - Agency established expectations

Must always comply with the most stringent regulation.



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MEDICARE CONDITIONS OF PARTICIPATION

CONDITIONS OF PARTICIPATION

- §418.78 L642
- Volunteers
 - 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

CONDITIONS OF PARTICIPATION

- § 418.78(a) L643
- Training
 - The hospice must maintain, document and provide volunteer orientation and training that is consistent with hospice industry standards

CONDITIONS OF PARTICIPATION

- § 418.78(b) L644
- Role
 - Volunteers must be used in day-to-day administrative and/or direct patient care roles

CONDITIONS OF PARTICIPATION

- § 418.78(c) L645
- Recruiting and retaining
 - The hospice must document and demonstrate viable and ongoing efforts to recruit and retain volunteers

CONDITIONS OF PARTICIPATION

- § 418.78(d) L646
- Cost Savings
 - The hospice must document the cost savings achieved through the use of volunteers, and documentation must include the following:
 - Identification of each position that is occupied by a volunteer
 - Work-time spent by volunteers occupying those positions
 - Estimates of the dollar costs that the hospice would have incurred if paid employees occupied the positions

There is no requirement for what the cost savings must be, only on how it is computed.

COST SAVINGS CALCULATION

- <http://www.pointsoflight.org>
- <http://www.independentsector.org>

CONDITIONS OF PARTICIPATION

- § 418.78(e) L647
- Level of Activity
 - Volunteers must provide day to day administrative and/or direct patient care services in an amount that, at a minimum, equals 5% 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

LEVEL OF ACTIVITY

- What can be counted?
- Routine Administrative
 - Volunteers may assist in the hospice's ancillary and office activities that support direct patient care activities
 - These duties may include answering telephones, filing, assisting with patient and family mailings, and data entry

LEVEL OF ACTIVITY

- Routine Direct Patient Care

- The hospice may also utilize volunteers in direct patient care services, or to help patients and families with household chores, shopping, transportation, and companionship
- Examples of direct patient care services include mowing a patient's lawn or walking their dog
- The key is that the volunteer has direct contact with the patient and the family

LEVEL OF ACTIVITY

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

- a. Telephone calls to patient, family or survivor
- b. Travel time to patient homes, if travel time is also used in the calculation for staff hours
- c. 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
- d. Time volunteer is being trained to perform a particular administrative task (clerical duties in the office)

LEVEL OF ACTIVITY

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

LEVEL OF ACTIVITY

Examples of volunteer hours that cannot be counted:

- a. Sewing, stitching and quilting
- b. Flower arranging
- c. Craft projects, such as making greeting cards, e.g. bereavement, sympathy and birthday cards
- d. Singing at hospice inpatient units
- e. Fundraising
- f. Participation in organization's governing board
- g. Thrift shops
- h. General volunteer training hours, not specific to a patient or administrative task

CONDITIONS OF PARTICIPATION

- §418.52 L501
- Patient Rights
 - Written and verbal information given to patients must include the provision of volunteer services
 - Patients need to be aware that volunteers are available to them and be able to make the decision for volunteer services

CONDITIONS OF PARTICIPATION

- § 418.100(c)
- L652
 - A hospice must be primarily engaged in providing the following care and services and must do so in a manner that is consistent with accepted standards of practice

CONDITIONS OF PARTICIPATION

- § 418.56 L538, L539, L545, L547, L552, L553
- Interdisciplinary group, care planning and coordination of services
 - Volunteer coordinators or volunteers must be part of the care planning process, document on the plan of care of all patients receiving volunteer services and review, revise and document the individualized plan as frequently as the patient's condition requires but not less frequently than every 15 days

CONDITIONS OF PARTICIPATION

- § 418.114 L795
- Criminal background checks
 - The hospice must obtain a criminal background check on all hospice employees who have direct patient contact or access to patient records

CONDITIONS OF PARTICIPATION

- § 418.114 L796
- Criminal background checks
 - Criminal background checks must be obtained in accordance with State requirements
 - In the absence of State requirements, criminal background checks must be obtained within three months of the date of employment for all states that the individual has lived or worked in the past three years

VISIT FREQUENCY

- §418.56 L547
- Plan of Care
 - Detailed statement of the scope and frequency of services to meet the patient's and family's needs
 - It requires that when a volunteer is part of the care of a patient, the scope, frequency and update happens just as it does for all other disciplines
 - "PRN" may not be used as a standalone visit frequency on the plan of care

COMMONLY ASKED QUESTIONS

- How many hours should a volunteer training be?
 - CMS nor ACHC require a specific time requirement
- How many hours of annual training?
 - CMS does not require a specific time requirement
 - ACHC requires eight hours for non-direct; 12 hours for direct (plus specific topics)
- Can paid hospice staff volunteer for their hospice employer on their off-hours?
 - For-profit vs. non-profit

COMMONLY ASKED QUESTIONS

- Can teens (under 18 years old) volunteer for a hospice?
 - CMS nor ACHC require volunteers to be 18 or older
- Does a volunteer need to complete an I-9 form?
 - No as they are not being compensated for their work

SURVEY PREP

- Must be able to demonstrate the ability to provide administrative and direct care volunteer services
- Volunteers have received orientation
 - State requirements if applicable
- Volunteers have received annual training
- Must be able to demonstrate that the activity rate of the utilization of volunteers meets or exceeds the required 5% annually

SURVEY PREP

- Volunteer cost savings report
- Must be able to demonstrate how the agency supports volunteers and efforts to recruit volunteers
- Volunteers meet the personnel requirements
 - Background checks
 - Competency
 - Accrediting organization and state requirements, if applicable

SURVEY PREP

- Patient education materials or admission materials describe the services provided by volunteers
- Volunteers that are providing support to patients must be included in the plan of care
 - Have a visit frequency
 - Documentation is present in the medical record

RESOURCES

- <http://www.hospicevolunteerassociation.org>
- <http://hospicevolunteertrainingonline.com>



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QUESTIONS?

Call (855) 937-2242 | [achc.org](https://www.achc.org)