



Medicare Hospice Conditions of Participation Social Work

Summary

Highlights of key changes for social work professionals and guidance for implementation

- 1) 418.54 – Initial and Comprehensive Assessment and Standard
- 2) 418.58 – Quality Assessment/Performance Improvement
- 3) 418.114b – Personnel Qualifications

Background

In the new Conditions of Participation, the social work assessment is part of the comprehensive assessment, which must be completed within five days of the election of hospice care. Personnel qualifications for social workers practicing in hospice have been redefined. When NHPCO commented on the proposed Conditions of Participation in 2005, NHPCO supported leaving the social work requirement at its current level, a Bachelor in social work from a school accredited by the Council on Social Work Education. When the final Conditions of Participation were being reviewed within CMS and inside the Department of Health and Human Services, the eligible degrees were expanded to include sociology, psychology and “a degree related to social work.” There is a requirement that social workers on the team have MSW supervision. The intent of the standard is to have quality psychosocial services provided to patients and families. Programs adequately staffed may not need to make any changes.

418.54 – Initial and Comprehensive Assessment

Admission and Assessment: The social work assessment is a part of the comprehensive assessment, which must be completed within five days of the election of hospice care. Many programs are sending the RN and the social worker to jointly conduct the admission visit, which could also be the beginning of the initial assessment. The social worker may begin his/her part of the comprehensive assessment during this visit. Suggestions for implementation include using this as an opportunity to evaluate the current psychosocial needs and status of the patient and collect data to contribute to the patient plan of care.

418.58 – Quality Assessment/Performance Improvement

Outcome Measures: The new Conditions of Participation require that hospices conduct performance improvement projects as a part of the Quality Assessment/Performance Improvement process, where issues involving social work will be considered. Social workers are less familiar with collecting data on measurable outcome measures and may need additional education and collaboration on how to proceed. Programs located in communities with institutions of higher learning may want to seek training from social work faculty. Overall the new Conditions of Participation should lead to better patient care although research that helps guide appropriate social work interventions is needed.

418.114b – Personnel Qualifications.

Degrees allowed: The final CoPs require that the social worker either:

- has a Master of Social Work (MSW) from a school of social work accredited by the Council on Social Work

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Education or

- has a baccalaureate degree in social work from an institution accredited by the Council on Social Work Education; or
- a baccalaureate degree in psychology, sociology, or other field related to social work and is supervised by an MSW as described in paragraph (b)(3)(i)(A) of this section; and
 - ✓ Has 1 year of social work experience in a healthcare setting; or
 - ✓ Has a baccalaureate degree from a school of social work accredited by the Council on Social Work Education, is employed by the hospice before December 2, 2008, and is not required to be supervised by an MSW.

Social work supervision: The Conditions of Participation require that, after the December 2, 2008 implementation deadline, the social workers that have BSWs and other degrees will need to have MSW supervision.

Additional information

State Laws: In an effort to protect the public from individuals misrepresenting their qualifications, some states have passed laws preventing individuals from using the title of social worker unless they have a social work degree. Hospice programs need to be aware of state law when it is more stringent than the Federal Register Conditions of Participation. Given the variability of state laws consult the Association of Social Work Boards website (www.aswb.org) to learn more about laws and regulations relating to the practice of social work.

Resources I need to be successful:

- The NHPCO *Social Work Guidelines* provides very useful information for hospice social workers and should be a primary resource.
- Information on clinical supervision is available in the NHPCO *Social Work Guidelines* and may be a helpful resource in writing supervision policies (www.nhpc.org/marketplace, item number 712653).
- Hospice programs will need to develop a policy and procedures for to define the agency's policies for hiring candidates for social work positions from a "related field."
- Hospice programs will need to determine the level of supervision needed to assure high quality patient care, including both clinical and administrative supervision.
- Rural or small programs that have had difficulty recruiting may need to contract with a MSW for a specific number of hours per week to provide supervision.
- Work with your State hospice organization and encourage them to explore working with Schools of Social Work to build relationships to facilitate hiring.

Prepared by the NCHPP Social Work Section Steering Committee