



November 24, 2025

The Honorable Mehmet Oz
Administrator
Centers for Medicare & Medicaid Services
7500 Security Boulevard
Baltimore, MD 21244

Re: Hospice Quality Reporting Program Compliance Calculation

Dear Administrator Oz,

On behalf of LeadingAge, the National Alliance for Care at Home, and the National Partnership for Healthcare and Hospice Innovation (NPHI), we are again strongly urging the Centers for Medicare & Medicaid Services (CMS) to waive the HOPE timeliness submission requirement for the first quarter post-implementation. Since our previous correspondence, some of the implementation challenges we anticipated have materialized and, in some cases, exceeded our concerns. Hospice providers nationwide are experiencing significant barriers compromising their ability to meet the 90% timeliness threshold through no fault of their own.

The simultaneous launch of HOPE and migration to iQIES coincided with the first day of the government shutdown. This timing created a unique situation where the Hospice Quality Question Help Desk was unable to send responses to provider questions after October 1, 2025. This resulted in:

- providers receiving fatal errors and rejections without access to technical support or guidance
- fatal errors and record rejections tied to system configuration issues beyond the provider's control
- absence of real-time problem resolution during the period most critical to implementation

System configuration issues included mismatches between instructions in the HOPE Guidance Manual v1.01 and the HOPE Data Specs v1.00.

The Hospice Quality Reporting Program (HQRP) carries uniquely severe financial consequences for hospice providers. It is a "pay-for-reporting" program, which requires hospices to submit a high percentage (90%) of data records within a calendar year or receive an annual payment update penalty of four percent. This penalty is twice that of other providers and has significant impact on hospice providers, as many are small, independent businesses, a great deal of which are not-for-profit. In calendar year 2025, the penalty is heavily influenced by a hospice's experiences during a

single quarter. **The consequence of adverse outcomes cannot be understated. The risk of negative financial consequences for hospice providers is largely dependent this quarter not only on the success of two transitions—iQIES and HOPE—that are not within their control but also during a uniquely challenging government shutdown.**

CMS has stated that it does not intend to use the data submitted during the first quarter of HOPE for public reporting purposes because this quarter is considered part of the learning curve and is not reliable for public reporting. It is also not reliable as an indication of a hospice's annual compliance performance for timely submissions. During this final quarter of 2025, hospices are managing two additional timepoints compared to the previous data reporting tool, the Hospice Item Set (HIS), and simultaneously migrating from QIES to iQIES while navigating inconsistencies in instructions without real-time support to resolve issues. These are extraordinary implementation circumstances.

Our associations remain fully committed to the Hospice Quality Reporting Program and recognize the critical importance of accurate, timely data submission to inform high-quality hospice care. We are not requesting relief from the reporting requirement itself—hospices continue to collect and submit HOPE data diligently. We are requesting that CMS acknowledge the unprecedented implementation challenges and exclude the compromised first quarter from compliance calculations. This request is narrower than our original recommendation for a waiver of the first two quarters, reflecting our recognition of CMS's commitment to quality measurement while addressing the demonstrable reality that first-quarter implementation has been compromised by factors outside the control of hospices. Waiving the first quarter of HOPE submissions from the HQRP timeliness submission requirements provides hospices a reasonable stabilization period to resolve issues with CMS support while maintaining accountability by keeping all subsequent quarters fully accountable to the 90% threshold.

We appreciate the opportunity to share these concerns and thank you, in advance, for your consideration. Please let us know if you have any questions. Additionally, we are glad to schedule time for a discussion if that is preferred.

Sincerely,

LeadingAge

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