

November 20, 2013



COALITION FOR  
COMPASSIONATE CARE  
OF CALIFORNIA

Howard Backer, MD, MPH, FACEP  
Emergency Medical Services Authority  
10901 Gold Center Drive, Suite 400  
Rancho Cordova, CA 95670

Dear Dr. Backer:

The purpose of this letter is to request that the revised POLST form go into effect October 1, 2014, rather than April 1, 2014, the effective date previously approved EMSA.

Since October 1, 2010, California has been utilizing Section S of the Minimum Data Set (MDS) to collect information on the use of POLST in nursing homes. MDS is the resident assessment form used in virtually all nursing homes. The information gathered through MDS Section S has been valuable for evaluating the prevalence and quality of POLST form completion in California nursing homes.

Previously, the Centers for Medicare and Medicaid Services (CMS) allowed California to update MDS Section S every six months, i.e. April 1 and October 1 of any given year. In August, we learned that CMS now allows updates only once a year, namely October 1 of any given year.

As a result, the POLST Task Force Documentation Committee recommends delaying implementation of the new POLST form until October 2014. This delay will enable the POLST revisions to go into effect at the same time as MDS Section S changes go into effect. Thus, both POLST and MDS will use identical wording.

If the wording on MDS Section S does not correspond to the POLST form, the data collected through MDS will likely be full of errors. In addition, delaying the POLST revisions will streamline the education process for nursing homes that utilize POLST.

Please let us know if you have any questions or concerns about delaying the effective date of the revised POLST form.

Thank you,



Judy Citko, JD  
Executive Director

CC: Lisa Withey and Adam Morrill