



COMISS – The Network on Ministry in Specialized Settings

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Centers for Medicare and Medicaid Services
Department of Health and Human Services
7500 Security Blvd.
Baltimore, Maryland 21244-1850

Attention: CMS-3844-P

Dear Sirs:

Background

Founded as the Council on Ministry in Specialized Settings in June of 1979, the COMISS Network – the Network on Ministry in Specialized Settings – is a national organization of chaplaincy, pastoral care, and pastoral counseling stakeholders. The organization has been known as the Council, Congress, Coalition, and, now, Network on Ministry in Specialized Settings, or less formally, the COMISS Network.

The COMISS Network is the product of many years of interfaith cooperation in the development and delivery of pastoral services to persons in a variety of specialized ministry settings, including Hospice. Other ministries are chaplaincies in health care facilities, correctional institutions, mental health settings, pastoral counseling, the armed forces, business settings, industrial settings, clinical pastoral education, the National Conference on Ministry to the Armed Forces, denominations and faith groups which credential military and civilian chaplains across the country, and the Department of Veterans Affairs. Our constituent members are the leaders of the professional pastoral care community, and they represent *tens of thousands of professional chaplains and pastoral counselors* serving in various settings across the country, in addition to the *millions of lay people* who form the congregations that our member Religious Endorsing Body Representatives actively represent.

The Vision of the COMISS Network is to be a pre-eminent network, a unified voice for the preparation and practice of spiritual care through chaplaincy and pastoral counseling. The Mission of COMISS Network is to be a network of professional organizations, institutions, and faith communities that promotes and supports collaboration among its membership and is the collective voice of advocacy to a variety of publics on behalf of the Network. COMISS Network is a forum for dialogue and action among five distinct pastoral care and counseling communities:

1. Professional Certification Organizations, which certify professional board chaplains and pastoral counselors to perform ministry activities in specialized settings.
2. Professional Accreditation Organizations, which accredit programs to train clergy (lay people) on their way to becoming professional chaplains or pastoral counselors.
3. Religious Endorsing Bodies [American denominations and faith groups], which endorse professional chaplains and pastoral counselors to perform ministry in specialized settings.
4. Professional Pastoral Care Organizations, which exist as groups of chaplains and/or other pastoral care professionals whose work focuses on ministry in specialized settings.
5. Chaplain and Pastoral Care Counselor Employing Organizations, which utilize the services of chaplains or pastoral counselors certified by one of the certifying organizations of the COMISS Network.

These five distinct communities share a common commitment to the value of religious faith/cultural differences and beliefs in the shaping of the individual and community life. In addition, they share a common will to make available appropriate ministry, counseling in specialized settings, ministry counseling characterized by the highest levels of professionalism, loving service, mutual trust, mutual support, integrity, and justice.

Current COMISS Network Initiatives

The COMISS Commission for Accreditation of Pastoral Services (CCAPS) provides accreditation for health care organizations involved in the delivery of pastoral/spiritual care in specialized settings. The Commission is concerned with the development and application of professional standards for pastoral/spiritual care departments. CCAPS will attest to the ability of a facility and its pastoral/spiritual services to meet the standards for accreditation of pastoral/spiritual care services developed by the COMISS Network. Although accreditation of the health care organization's pastoral services by CCAPS is a voluntary process, accreditation of a health care facility's pastoral/spiritual services demonstrates a commitment to providing quality, holistic, cost-effective care. Accreditation sends an important message to consumers about their health and the importance of choosing a health care facility that emphasizes the delivery of excellent care – physical, holistic, and spiritual.

Pastoral Care Week

In 1983 the National Association of Catholic Chaplains passed a resolution to establish a Pastoral Care Week. The first Pastoral Care Week was held in October 1985. In December 1986, COMISS recommended at its annual meeting to establish a committee to implement a National Pastoral Care Week. Since then it has grown beyond national to international proportions. The celebration of Pastoral Care Week provides an opportunity for chaplains and pastoral counselors, educators and providers, to share their story and to celebrate various ministries. Each year a new theme brings to light a certain aspect of pastoral/spiritual care as a focus. A new theme invites us to new and creative ways to tell the story of pastoral/spiritual care. Pastoral Care Week recognizes and highlights professional chaplaincy and pastoral/spiritual care in specialized settings.

Regarding the CMS Proposed Rules

As CMS studies the proposed rules, including revision of the conditions of participation in the Medicare/Medicaid programs for Hospice, COMISS strongly recommends that conditions for participation include the following:

1. That the spiritual caregivers be professionally trained and nationally certified as board certified chaplains.
2. That board certified chaplains be recognized as spiritual and professional advocates for patients' rights, especially in areas of illness, end of life issues, and ethical decisions. (Proposed 418.52)
3. Board certified chaplains are trained to provide spiritual assessments that identify issues, interventions, and specific outcomes to meet the unique needs of each hospice patient and their family. Additionally, board certified chaplains are trained in how to document in both clinical and progress notes in ways that articulate clearly to the entire interdisciplinary team what spiritual issues may impact the overall care of the patient and family. Professional chaplains are guided by and adhere to national standards of practice in assessment, interventions regarding spiritual distress, loss, bereavement, coping, and the use of religious and spiritual resources identified by the patient and family. (Proposed 418.54)
4. That board certified chaplains have appropriate skills in documentation, the writing of spiritual care plans, and have effective communication skills. (Proposed 418.56)
5. That board certified chaplains engage in quality assessment and performance improvement, using their resources and skills in projects, assignments, and planning guided by professional practice standards applicable to hospice care. (Proposed 418.58)
6. That board certified chaplains offer training and oversight to volunteers, especially those who provide spiritual and emotional support to patients, families, and friends. (Proposed 418.78)
7. That board certified chaplains maintain national standards of practice in order to organize, manage, and administer spiritual care to patients, families, and staff within the

hospice environment while maintaining dignity, comfort, and advocacy for those they serve. They serve as teachers to the disciplines that serve the patients and families, explaining patient rights, advance directives, end of life issues, ethical decisions, and cultural, religious, and spiritual needs. (Proposed 418.100)

8. Board certified chaplains are trained to use inclusive language, thus honoring the spiritual and religious traditions of the patient and the family. Rather than use the word “clergy” (which is a Christian term) we support the use of the term “Board Certified Chaplain” for those employed by the hospice and “community religious leaders” for those who serve as community support and/or volunteers.
9. Board certified chaplains are trained in sensitivity and awareness of cultural issues. It is important, especially to those in hospice and other facilities, that their rights be observed and respected as far as possible. Certain dietary restrictions or needs, places for meditation, other spiritual or religious rituals, and responding to their cultural diversities, will help the patient and family sense the caring and understanding by staff of what is important to them during this sacred time.

Finally, we thank you for giving us the opportunity to comment on CMS-3844-P. We have included copies of our COMISS CCAPS Standards for the accreditation of Pastoral Services and an Accreditation Process Summary. If you have any questions, please visit our website at www.COMISSNetwork.org, or email us at info@comissnetwork.org or contact our office at 757-728-3180, and ask to speak with our Executive Administrator, Chaplain Will Kinnaird.

Respectfully submitted,

Rev. George A. Langhorne, Ed.D.
COMISS Network Chair

Attachment COMISS Network’s CCAPS Standards for Accrediting Pastoral Services
 COMISS Network’s CCAPS Accreditation Process Summary