

Justification for Emergency PRA Clearance for Medicare CAHPS Survey

Subject: The Centers for Beneficiary Choices (CBC) is requesting that the Paperwork Reduction Act (PRA) package for the Medicare CAHPS Survey be processed under 5 CFR 1320.13 (a)(2)(i) for emergency clearance.

Background: This revised request for approval takes the OMB approved MA (OMB control number is 0938 0732) and FFS CAHPS (OMB control number is 0938-0796) instruments and adds new Prescription Drug Plan (PDP) questions as mandated in Medicare Prescription Drug, Improvement, and Modernization Act of 2003 (MMA). This revised package request will continue to use the OMB control number is 0938-0732, but will merge the MA and FFS surveys into one package. Specifically the MMA under Sec. 1860D-4 (Information to Facilitate Enrollment) requires CMS to conduct consumer satisfaction surveys regarding the prescription drug plan or the MA prescription drug plan pursuant to section 1860D-4(d) and report the results to Part D eligible individuals at least 30 days prior to the enrollment period. There is an exception for unavailability of information for the first plan year it is offered and for the next plan year if it is impracticable or the information is otherwise unavailable. This request for approval is to ensure that CMS is able to conduct the Medicare CAHPS surveys in time to publicly report the data for the open enrollment period in Fall 2007.

Development of the Medicare CAHPS surveys is a coordinated effort between CMS and the Agency for Healthcare Research and Quality (AHRQ) under a very tight timeframe. Because persons with Medicare could not join a Prescription Drug Plan (PDP) until January 2006, testing of the PDP questions added to the survey could not begin until enrollees had enough experience with their plan. Currently, AHRQ is field testing the PDP set of questions in the Medicare CAHPS (OMB No. 0935-0124) to be completed November 2006. The new Medicare CAHPS survey reduced burden to respondents through use of a shortened version of the Medicare Advantage (MA) and Medicare fee-for-service (MFFS) set of questions. With addition of questions on the experiences of persons enrolled in a Medicare prescription drug plan, the survey will permit aggregation of the data and presentation of CAHPS measures at levels representing MA and MA-PD plans, as well as stand-alone PDPs, and the original Medicare FFS health plan. Information from the data collected in these surveys will be publicly reported on Medicare.gov to assist beneficiaries in selecting among the health plan and prescription drug plan choices available during open enrollment in 2007. **Delay in implementing the Medicare CAHPS survey would cause CMS to not meet its legislative requirements to collect and report satisfaction information on MA plans, FFS, MA-PDs and PDPs and cause public harm by not providing information to the public to assist persons with Medicare in their plan choices available under the MMA.**

The Centers for Medicare & Medicaid Services (CMS) has collected information on consumer health services experiences of people with Medicare coverage enrolled in Medicare Advantage health plans through annual implementation of the Consumer Assessment of Healthcare Providers and Systems (CAHPS) Survey (MA-CAHPS) since 1998. In 2000, CMS began collecting similar information from people with Medicare enrolled in fee-for-service. Results of these surveys have been presented in the Medicare & You handbook and have been made available to people with Medicare on the Medicare.gov web site. Beginning in 2006, CMS is required to expand data collection in its CAHPS surveys to also include consumer satisfaction and experience of persons with Medicare in a MA-PD or PDP plan, if they have enrolled in one.

CMS will publish results from the MA-MFFS PDP CAHPS surveys on www.medicare.gov to assist beneficiaries in choosing a health plan. In the past, the measures published included two rating items (the overall rating of the health plan and the overall rating of health care), three composite measures of beneficiary experiences with health plans (getting needed care, getting needed care without long waits, and doctors who communicate well), and three single items (seeing a

specialist, flu shots, and pneumonia vaccinations). The Medicare Options Compare on www.medicare.gov presents comparisons of these results for individual Medicare Advantage (MA) health plans available in a geographic area as compared with the state and national averages for MA plans and for fee-for-service (“original”) Medicare. Additionally, one composite measure is reported at the plan and state level, in the Medicare & You handbook.

The deadline for having Medicare CAHPS data available for the handbook is June 2007 and July 2007 for the web in order to have information for open enrollment in Fall 2007. If the printing of the survey begins in December, as requested, this permits CAHPS survey results to be available by June. The schedule of timelines is as follows:

Survey Activities	Deadline Dates
Begin printing of 600,000 surveys with personalized names of health and drug plans in English and Spanish	December 20, 2006
Staff training materials for survey operations Mailout of prenotification letter	January 15, 2007
First mailout of questionnaire	February 1, 2007
Second mailout of questionnaire	February 7, 2007
Telephone follow up begins	March 5, 2007
Completion of data collection activities	March 17, 2007
Begin data cleaning including data reconciliation between mail and telephone responses	April 15, 2007
Creation of weights: person-level, plan-level and population based.	May 11, 2007
Creation of Case Mix Adjustment variables	May 28, 2007
Data analysis including developing plan level estimates, scoring of composites and public reporting estimates.	June 4, 2007
Handbook/Web Data Measures Delivered	June 7, 2007
	Final Deadline Date: June 15, 2007

We therefore request emergency OMB approval of the Medicare CAHPS questionnaire to meet the tight schedule for collection and reporting of Medicare health and prescription drug plan information in fulfillment of the MMA requirements.

KEY PRECEDING EVENTS	
Date	Milestone
October 20, 2006	Emergency Justification request submitted
October 24, 2006	Emergency PRA package submitted
October 27, 2006	OMB approval for Emergency Justification request
November 16, 2006	Received finalized survey instrument from AHRQ and CAHPS grantees
November 17, 2006	PRA Federal Register Notice comment period begins
Dec 1, 2006	Finalized instrument sent to OMB
December 4, 2006	PRA Federal Register Notice 20 day comment period ends
Dec 18, 2006	OMB approval
Dec 20, 2006	Finalized survey is sent to printer in preparation for February fielding of the survey.
February 1, 2007	Fielding of 2007 Medicare CAHPS survey is started

Contact: Amy Heller amy.heller@cms.hhs.gov 410-786-9234 or Ted Sekscenski Edward.sekscenski@cms.hhs.gov 410-786-7167.