

## **JUSTIFICATION – NONSUBSTANTIVE CHANGES (BASED ON PRE-TESTING)**

We asked some field investigators from CMS Los Angeles office to test the home health, attending physician and beneficiary interview instruments from the Probable Fraud Measure Pilot (PFMP). The feedback indicated that the some of the questions were too long and too complex. In addition, we changed the formatting of the instruments to make it friendlier and easier.

In summary, we (1) simplified and changed some of the wording (2) deleted or merged similar skill statements to reduce redundancy and length, (3) moved skill statements from one section of the instrument to another to improve organization and allow us to consolidate sections.

**We consider all of the changes to be nonsubstantive since they do not constitute changes to the intent or substance of the survey, but only remove redundancies and simplify the content. With the revisions to the survey, we expect it will take less time and will be easier for the respondents and for the interviewer to complete – representing no change to our original burden estimate.**