

Justification for Nonsubstantive Changes
CMS-10500, OMB 0938-1240

This request for a nonsubstantive change responds to OMB's Terms of Clearance issued on July 7, 2015 (see below). Specifically, CMS requests approval to implement nationally the Consumer Assessment of Healthcare Providers and Systems Outpatient and Ambulatory Surgery Survey (OAS CAHPS). CMS also requests approval for nonsubstantive changes to its Cover Letter. A Crosswalk of the changes is attached to this package.

Nonsubstantive Change for National Implementation of the OAS CAHPS Survey

TERMS OF CLEARANCE: Only the mode experiment is approved at this time. CMS will submit a non-substantive change when ready to move forward with the national survey.

CMS RESPONSE: Documentation of our plans for the national implementation in 2016 were included in the package that was approved by OMB on July 7, 2015. In that package the request for a mode experiment for the fall of 2015 was also documented. The purpose of this memo is to request approval for the national implementation.

With this memo, we provide the additional information requested by OMB, namely: (1) an update on the preliminary findings from the mode experiment, and (2) documentation of nonsubstantive changes for the materials to be used for national implementation.

CMS is currently conducting a mode experiment to determine the impact of differences in response tendencies using the three data collection modes that will be used for the national implementation of OAS CAHPS. The purpose of the mode experiment is to determine differences in survey responses based on the three modes of data collection and to determine patient characteristics that might affect experiences and the ratings of the care they receive. The mode experiment findings will produce estimates for any patient mix and mode adjustments that might be necessary to publically report comparative information. For example, if we find that the telephone mode is more likely to produce a positive response relative to mail only, we will adjust the telephone only responses accordingly to ensure that overall scores across facilities or departments are comparable. Based on prior mode experiments, adjustments are rarely more than five percent, and can be less than one percent or non-existent.

The experiment is a one-time (cross-sectional) survey of patients currently receiving care from HOPDs and ASCs. A random sample of eligible patients who received outpatient surgical care during the preceding month has been selected and patients are being contacted to gather data about their experiences with outpatient care. The first of three rounds of data collection was conducted from September 3 to October 15, 2015. All three rounds were completed by December 15, 2015.

Preliminary results from the first round of the mode experiment confirmed that the anticipated response rates for each of the three modes of data collection are holding true to the expectations. The Round 1 response rates by mode are as follows:

Mail-only: 35% response rate
Telephone-only: 32% response rate
Mixed-mode: 47% response rate

While the analysis of the mode experiment data will not be completed until all three rounds have been completed, a preliminary review of the data for Round 1 indicates that respondents are able to answer the questions.

However, the mode experiment will not identify any changes to the content of the survey questions nor will it impact the implementation plans that would affect the start-up of the national implementation. The results of the mode experiment will be used exclusively to inform the analysis of the data collection and the final reporting.

No other revisions to the materials and protocols for national implementation are planned. The analysis of the mode experiment findings, which will take place in 2016, will produce estimates for any patient mix and mode adjustments that might be necessary before the data can be publically reported by CMS in 2017.

Nonsubstantive Change to Cover Letter

CMS requests approval for a nonsubstantive change to the cover letter which would make the OAS CAHPS cover letter consistent with other CAHPS Surveys. A Crosswalk of the changes is attached to this package along with a clean copy of the letter..