

**Supporting Statement – Part A**

**Beneficiary and Family Centered Information Collection (CMS-10393)**

**Submitted for the Centers for Medicare & Medicaid Services**

**June 25, 2020**

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## Background

**Background on Beneficiary and Family Centered Information Collection.** To ensure the QIOs are effectively meeting their goals, CMS collects information about beneficiary experience receiving support from the QIOs.

The information collection uses both qualitative and quantitative strategies to ensure CMS and the QIOs understand beneficiary experiences through all interactions with the QIO including initial contact, interim interactions, and case closure. Information collection instruments are tailored to reflect the steps in each type of process, as well as the average time it takes to complete each process. The previously approved information collection instruments are included with this submission.

The information collection will:

- Allow beneficiaries to directly provide feedback about the services they receive under the QIO program;
- Provide quality improvement data for QIOs to improve the quality of service delivered to Medicare beneficiaries; and
- Provide evaluation metrics for CMS to use in assessing performance of QIO contractors.

To achieve the above goals, information collection will include:

1. **Experience Survey:** The Experience Survey will be administered via telephone and mail to beneficiaries/representatives after the complaint/appeal case has been closed. The goal of the Experience Survey is to assess beneficiary overall and specific experiences with the BFCC QIOs.
2. **Direct Follow-up:** Direct Follow-up calls will be made to a sample of beneficiaries/representatives who have contacted the BFCC QIO help desk for any reason, including those that did not result in the formal initiation of an appeal or complaint case. This information collection will provide information about beneficiary experiences with the QIOs that extend beyond processing of complaint and appeal cases.
3. **General Feedback Web Survey:** All Beneficiaries/representatives who file a complaint or appeal will be given an opportunity to provide feedback about their experiences with the appeal/complaint process. A link to a General Feedback Web Survey will be included with each case closure letter sent by the QIOs.

### A. Justification

#### 1. Need and Legal Basis

The functions of the Peer Review Organizations, including determining whether the quality of health care services meets professionally recognized standards of health care, are set forth in the Social Security Act, Section 1154 (a)(1)(B). The statutory authority for the Quality Improvement

Organization (QIO) Program is found in Part B of Title XI of the Social Security Act as amended by the Peer Review Improvement Act of 1982 (P.L. 97-248, §§ 141-143, 96 Stat. 324). The Social Security Act established the Utilization and Quality Control Peer Review Organization Program, now known as the QIO Program. The Trade Adjustment Assistance Extension Act of 2011 (P.L. 112-40, § 261, 125 Stat. 401, included as Attachment A with pertinent sections highlighted) has since amended the provisions of the QIO program and requires QIOs to perform, subject to the terms of their contracts, activities that the Secretary of the Department of Health and Human Services (HHS) determines may be necessary for the purposes of improving the quality of care furnished to Medicare beneficiaries.

To accomplish the statutory mandate, the Centers for Medicare & Medicaid Services (CMS) has identified the following requirements for the QIO program:

- Improve quality of care for beneficiaries;
- Protect the integrity of the Medicare Trust Fund by ensuring that Medicare pays only for services and goods that are reasonable and necessary and that are provided in the most appropriate setting; and
- Protect beneficiaries by expeditiously addressing individual complaints, such as beneficiary complaints; provider-based notice appeals; violations of the Emergency Medical Treatment and Labor Act (EMTALA); and other related responsibilities as articulated in QIO-related law.

## **2. Information Users**

Data resulting from the Beneficiary and Family Centered Information Collection activities are the only ways CMS obtains direct feedback from beneficiaries and their representatives about the beneficiary protection support provided through the QIO program.

Beneficiary and Family Centered Information Collection produces three types of products:

1. A monthly results dashboard for QIOs and CMS to use in on-going performance monitoring;
2. A quarterly delivery of qualitative feedback from beneficiaries and representatives (along with thematic analysis) used to identify specific quality improvement strategies; and
3. A quarterly analytic report used for CMS' program evaluation needs.

QIOs use the monthly data to understand the degree to which they are meeting beneficiary needs in the delivery of BFCC-QIO services. With a specific mandate to deliver services in a “beneficiary and family-centered way”, the QIOs review data results by type of interaction (appeal of Medicare service termination, complaint about quality of care delivered, need for immediate advocacy to resolve a dispute with a provider or facility). The dashboard, displaying results in red, yellow, and green coding shows QIOs immediately which areas may be of concern. With drill-down functionality, QIOs can hone-in on the steps in their process that are not meeting beneficiary expectations. Further quality improvement strategies are identified by

analyzing the quarterly qualitative data, including verbatim feedback from beneficiaries about areas of strength and areas for improvement.

CMS uses monthly data and quarterly analytic reports to assess program performance more broadly. Focusing on trends over time, CMS directs refinements to the QIO program implementation, including changes to how beneficiary services are delivered. Data from the Experience Survey are also used as a metric in QIO performance evaluation and assessed for contract renewal.

### **3. Use of Information Technology**

**Experience Survey.** The Beneficiary Experience Survey is conducted primarily as a telephone data collection (with mail non-response follow-up). This collection is not currently available for electronic completion. With only telephone numbers and mailing addresses available on the sample frame, and no known source for corresponding email addresses for the Medicare beneficiaries, telephone primary data collection has proven effective at collecting the necessary data.

**Direct Follow-up.** The Direct Follow-up is conducted as a telephone data collection . This collection is not currently available for electronic completion. With only telephone numbers available on the sample frame and no known source for corresponding email addresses for the Medicare beneficiaries, telephone primary data collection has proven effective at collecting the necessary data.

**General Feedback Web Survey.** The General Feedback Web Survey uses a web survey (Website/internet technology) to collect information from Medicare beneficiaries electronically. The URL/Web address for the General Feedback Web Survey is printed on all case closure/disposition letters mailed to beneficiaries/representatives. While it can be challenging to “drive” people to a Web site from a hard copy letter; use of simple URLs is intended to minimize respondent burden while offering every beneficiary/representative an opportunity to voice their experience. This collection does not require an electronic signature from respondents.

### **4. Duplication of Efforts**

This information collection does not duplicate any other effort and the information cannot be obtained from any other source.

### **5. Small Businesses**

These requirements affect only individuals and households. Therefore, there is no economic impact on small businesses.

## 6. Less Frequent Collection

Data are collected on an on-going (monthly) basis to support QIO performance monitoring and to permit CMS to conduct QIO contract evaluation bi-annually. Failure to collect these data would limit understanding about whether QIO program goals were being met, limit accuracy of quality improvement activities, and inhibit CMS' ability to measure patient experience for QIO contract evaluation as indicated in the current QIO Statement of Work.

## 7. Special Circumstances

There are no special circumstances.

## 8. Federal Register/ Outside Consultation

The 60-day Federal Register notice was published on July 17, 2020 (85 FR 43581). There were no public comments received.

The 30-day Federal Register notice published September 28, 2020 (85 FR 60798).

**Outside Consultation.** During the development of the data collection instruments, CMS sought input from the BFCC QIOs as well as the Beneficiary and Family Advisory Council. Input was solicited to ensure that the data collected would be of greatest value to the organizations who are primarily tasked with using the information for improving quality. Specific individuals who provided input are listed in Exhibit 1. The QIOs also have provided ongoing input to CMS through Contracting Office Representatives since beginning the QIO 12<sup>th</sup> Scope of Work in May 2019.

### Exhibit 1: Survey development consultants

Organization	Name	Contact Information
Livanta (BFCC-QIO)	Lance Coss	702-749-0601 <a href="mailto:lcoss@livanta.com">lcoss@livanta.com</a>
KEPRO (BFCC-QIO)	Gayle Smith	330-323-2188 <a href="mailto:gsmith@kepro.com">gsmith@kepro.com</a>
	Cheryl Cook	844-455-8708 x 7201 <a href="mailto:ccook@kepro.com">ccook@kepro.com</a>

## 9. Payments/Gifts to Respondents

There are no payments or gifts associated with this collection.

## 10. Confidentiality

Only de-identified data collected will be made available to CMS and the QIOs to support quality improvement efforts. Individual identifiers will not be linked to any survey data, results, or scores. To further ensure that respondents cannot be identified based on their open-ended

(verbatim) responses, all open-ended data are reviewed and identifying content removed, (e.g. name, places, medical conditions). Beneficiaries/representatives are informed that directly identifiable information about them will not be reported or shared publicly, nor will their survey responses be shared with QIOs in any identifiable manner.

### 11. Sensitive Questions

There are no questions of sensitive nature. in any of the information collection instruments.

### 12. Burden Estimates (Hours & Wages)

Exhibit 2 shows the estimated annualized burden hours for respondents' time to participate in the information collection initiatives. The total annual burden hours are estimated to be 2,191 hours.

Exhibit 3 shows the estimated annualized cost burden for respondents' time to participate in the information collection initiatives. The cost burden is estimated to be \$30,543 annually.

#### Exhibit 2: Estimated annual burden hours

Information Collection	Number of respondents	Number of responses per respondent	Hours per response	Burden hours
Experience Survey	8,700	1	0.25	2,175
Direct Follow-up	200	1	0.05	10
General Feedback Web Survey	200	1	0.03	6
<b>Total burden hours</b>				<b>2,191</b>

#### Exhibit 3: Estimated annualized cost burden

Information Collection	Number of respondents	Total burden hours	Average hourly wage rate <sup>1</sup>	Burden Cost
Experience Survey	8,700	2,175	\$13.94	\$30,320
Direct Follow-up	200	10	\$13.94	\$139
General Feedback Web Survey	200	6	\$13.94	\$84
<b>Total</b>	<b>9,100</b>	<b>2,191</b>		<b>\$30,543</b>

### 13. Capital Costs

There are capital costs to respondents or recordkeepers resulting from this data collection

<sup>1</sup> Based on *Income and Assets of Medicare Beneficiaries, 2016-2035*, published by the Kaiser Family Foundation Median annual income of \$26,200. <http://files.kff.org/attachment/Issue-Brief-Income-and-Assets-of-Medicare-Beneficiaries-2016-2035>

#### 14. Cost to Federal Government

Exhibit 4 shows the estimated annualized cost to the government for administering, analyzing, and reporting the Beneficiary and Family Centered Information Collections. The cost is estimated to be \$1,816,287 annually.

**Exhibit 4: Estimated annualized cost to the government**

<b>Information Collection</b>	<b>Annualized Cost</b>
Experience Survey	\$1,767,387
Direct Follow-up	\$34,929
General Feedback Web Survey	\$13,971
<b>Total</b>	<b>\$1,816,287</b>

#### 15. Changes to Burden

Total estimated burden for this request represents a decrease in burden hours from 2,899 (approach approved in February 2018 as OMB NO. 0938-1177) to 2,191. This is primarily the result of fewer beneficiaries to responding to the voluntarily available General Feedback Web Survey.

#### 16. Publication/Tabulation Dates

The Beneficiary and Family Centered Information Collections are administered by CMS through its contractor Avar Consulting. Based on prior OMB approval, the information collection infrastructure is in place. Avar will implement information collection as follows:

##### **Experience Survey:**

- Sampling – monthly and within ten days following the month the case was closed.
- Information collection – monthly beginning within 15 days following the month the case was closed.
- Analysis and reporting – monthly and within ten days following the month the information collection was conducted.

##### **Direct Follow-up:**

- Sampling – quarterly and within two days following the sampled call.
- Information collection – quarterly and within three days following the sampled call.
- Analysis and reporting – quarterly (included in Quarterly Analytic Reports).

##### **General Feedback Web Survey:**

- Information collection - on-going with solicitation through case closure letters.
- Analysis and reporting - monthly and within ten days following the month the information collection was conducted.

##### **Analysis and Reporting:**



- Results dashboard for QIOs and CMS - monthly and within ten days following the month the information collection was conducted.
- Qualitative beneficiary/representative data and thematic analysis – quarterly and within three months following the information collection.
- Analytic report on information collection activities, data, and trends – quarterly and within three months following the information collection.

### **17. Expiration Date**

The expiration date is displayed on the collection instruments.

### **18. Certification Statement**

There are no exceptions to the certification statement.