

## **Response to Comments Submitted Regarding CMS-10500, 60 Day Notice Outpatient and Ambulatory Surgery CAHPS (OAS CAHPS)**

Thank you for the opportunity to respond to comments submitted in response to the 60 Day Notice for CMS-10500, Outpatient and Ambulatory Surgery CAHPS, which was posted on April 23, 2021. We value the commenters' careful and thoughtful review and feedback.

### ***Responses to Comments about Burden on Facilities and Patients***

- 1. Suggestion to use electronic communication modes rather than traditional mail. Complete comment:** *"First suggestion is to get this form on line. All the rest of the world is filling these forms out and filing them electronically. But not the Feds. And, to add insult to injury, on the back of the form there's a notice about the Paperwork Reduction Act of 1995. But, no, you guys are still using trees, not electronics."*  
*"Second, can we write you electronically? No. More trees. How about listing an electronic address that we can use for a response?"*  
*"Third suggestion. Your mailing address to which this comment is to be addressed is listed as "Maryland," as opposed "MD." Everyone else, including the U.S. Postal Service uses the abbreviation. If you get computers you can find a list of state abbreviations at <https://about.usps.com/who-we-are/postal-history/state-abbreviations.htm>. Your organization brings a whole new meaning to "paperwork reduction." I guess, however, that pushing paper - as opposed to electrons - is a portion of the full employment act for OMB."*

**Proposed Response:** *With respect to electronic survey administration options:* Beginning in 2022, CMS plans to include web modes of survey administration for the OAS CAHPS Survey in addition to continuing to allow the traditional mail and telephone modes. Participating HOPDs and ASCs will be able to choose among the five available modes of survey administration (mail-only, telephone-only, mail with telephone follow-up, web with mail follow-up, or web with telephone follow-up) to better ensure that they can reach their patient population.

**NOTE:** The 2<sup>nd</sup> and 3<sup>rd</sup> comments are not related to OAS CAHPS, but rather OMB's protocol for providing public comments to the Federal Register Notice. As such, I did not think these would be included in the official responses posted.

2. **Comment from a consultant pharmacist in support of the national implementation of the OAS CAHPS Survey as a mechanism to improve accountability among ASCs.**

**Complete comment:** *"I am a consultant pharmacist in the ASC space and I am totally in favor of a national implementation of consumer assessment of healthcare providers and systems survey. As a pharmacist I have seen some pretty egregious things in the ASC space and unfortunately in my opinion the level of scrutiny and oversight is not as robust as it is in hospitals and other more highly regulated facilities. As a result I have seen providers cut a lot of corners especially as it pertains to medication management. As the amount of people that utilize ASC services continues to grow, I think requiring these surveys would effectively provide a mechanism for accountability especially if the results are directly posted without the manipulation of the facilities. That is without them being able to cherry pick the flattering surveys only as I have often seen."*

**Proposed Response:** CMS appreciates your support of the OAS CAHPS Survey and agrees that a nationally implemented consumer assessment of healthcare providers across ASCs and HOPDs is an important measure and provides an opportunity for patients to share their feedback on their experiences of care.

3. **Suggestion from the American Association of Nurse Practitioners (AANP) to consider beginning the survey with a listing of each clinician type**

**(e.g. nurse practitioners, physicians, nurses) and to replace the references to "your doctor" with "your health care practitioner" to better reflect the representation of nurse practitioners in the hospital outpatient departments and ambulatory surgery centers.**

**Complete comment:** *"The American Association of Nurse Practitioners (AANP), representing more than 325,000 nurse practitioners (NPs) in the United States, appreciates the opportunity to comment on ways to enhance the quality, utility and clarity of the National Implementation of the Outpatient and Ambulatory Surgery Consumer Assessment of Healthcare Providers and Systems (OAS CAHPS) Survey. NPs are advanced practice registered nurses (APRNs) who are prepared at the masters or doctoral level to provide primary, acute, chronic and specialty care to patients of all ages and backgrounds. Daily practice includes: assessment; ordering, performing, supervising and interpreting diagnostic and laboratory tests; making diagnoses; initiating and managing treatment including prescribing medication and non-pharmacologic treatments; coordinating care; counseling; and educating patients and their families and communities. NPs practice in nearly every health care setting including clinics, hospitals, Veterans Health Administration and Indian Health Services facilities, emergency rooms, urgent care sites, private physician or NP practices (both managed and owned by NPs),*

*skilled nursing facilities and nursing facilities, schools, colleges, universities, retail clinics, public health departments, nurse managed clinics, homeless clinics, and home health. NPs hold prescriptive authority in all 50 states and the District of Columbia and complete more than one billion patient visits annually. The OAS CAHPS survey is an important tool that assesses the hospital outpatient departments and ambulatory surgical center (ASC) experience of patients. NPs are essential health care providers within hospital outpatient departments and ASCs. However, the survey does not adequately include NPs. We request that HHS begin the survey by listing each clinician type (e.g. nurse practitioners, physicians) and update the questions which refer to “your doctor” to read “your health care practitioner” using provider-neutral language throughout. While the survey does have questions referring to “nurses” there is no mention of advanced practice nurses, including nurse practitioners. NPs are often the main care provider for a patient, performing the same functions as an attending physician. This needs to be reflected in the OAS CAHPS survey so that hospital outpatient departments, ASCs, and patients can better understand and accurately report the provider data that should be attributed to NPs, and other clinicians, in care delivery. We thank you for the opportunity to comment on the OAS CAHPS survey. We continue to strongly encourage CMS to standardize the practice of including nurse practitioners in all survey instruments. Should you have comments or questions, please direct them to MaryAnne Sapio, V.P. Federal Government Affairs, msapio@aanp.org, 703-740- 2529.”*

**Proposed Response:** CMS thanks the American Association of Nurse Practitioners (AANP) for the input regarding the contributions of nurse practitioners in the HOPD and ASC setting and will take these recommendations under consideration for future updates to the survey. We note that the OAS CAHPS Survey focuses on the facility, including all the staff that work at the facility whereas other CAHPS surveys may include a focus on individual healthcare practitioners within a facility. For this reason, the majority of the OAS CAHPS Survey questions refer to “doctors, nurses, or anyone from the facility” rather than a single individual who may have provided most of the care during the outpatient or ambulatory surgery or procedure.