

Responses to Public Comments to the Qualified Health Plan Enrollee Survey

(OMB Control Number: 0938-1221)

The following table contains the list of changes to the QHP Enrollee Survey and recommendations based on comments received during the 60-day public comment period that ended May 19, 2023.

Question # or Section Title	Summary of Public Comments	CMS Response
47 – Removal of the Flu Vaccination Question	<ul style="list-style-type: none"> • Two commenters (Anonymous and Elevance Health) supported the proposal to remove the flu vaccination question from the survey given enrollee’s potential difficulty to recall vaccine administration, ability to refuse vaccination, and retirement of the <i>Flu Vaccinations for Adults Ages 18-64</i> measure by the measure steward. • One commenter (AHIP) did not support the removal of the question due to concerns related to the proposed replacement measure, <i>Adult Immunization Status</i>, due to vaccine hesitancy, the combined rates used for that measure and potential difficulties to report the measure using electronic data collection methods. 	<ul style="list-style-type: none"> • CMS appreciates commenters’ support on the proposal to remove Question 47 (Flu Vaccination) from the QHP Enrollee Survey. • CMS believes that removal of the <i>Flu Vaccinations for Adults Ages 18-64</i> measure will support alignment with the measure steward, and CMS’ effort to reduce the length of the QHP Enrollee Survey.

Question # or Section Title	Summary of Public Comments	CMS Response
66-68 – Revision of the Race and Ethnicity Questions	<ul style="list-style-type: none"> Two commenters (Elevance Health and AHIP) supported the decision by CMS to align the race and ethnicity questions with data collection standards. One commenter (AHIP) noted that OMB requested comments on potential revisions to the race and ethnicity data standards.¹ One commenter (AHIP) offered additional suggestions to refine the race and ethnicity questions, including additional response categories (Arab, Middle Eastern, North African, Hispanic/LatinX, I choose not to respond) and revising “American Indian or Alaska Native” to “Native American, Alaska Native, or Indigenous.” 	<ul style="list-style-type: none"> CMS appreciates commenters’ support for the proposal to align the race and ethnicity questions with data collection standards. CMS intends to revise the questions with the 2011 Department of Health and Human Services (HHS) Data Standards (based on the 1997 OMB standards for the Classification of Federal Data on Race and Ethnicity).² CMS appreciates commenters’ recommendations for additional response categories and revisions. Questions in the QHP Enrollee Survey are voluntary and respondents may choose not to respond to any question. CMS will consider the suggested changes in the future and continually monitor OMB’s guidelines for collecting race and ethnicity for alignment with the QHP Enrollee Survey.
48-51 – Assistance with Smoking and Tobacco Use Cessation	<ul style="list-style-type: none"> One commenter (Elevance Health) recommended the removal of the questions due to limited survey responses on the measure. 	<ul style="list-style-type: none"> CMS does not recommend removing the questions without seeking additional feedback through the Call Letter process. CMS will continue to seek feedback through multiple venues, including consulting with the QHP Enrollee Survey TEP, future Draft Call Letters, and conducting focus groups with QHP issuers and enrollees
“Your Health Care in the Last 6 Months” Section	<ul style="list-style-type: none"> One commenter (Elevance Health) recommended adding a survey question near the beginning of the survey that asks the member whether they used their health plan within the last six months, immediately followed by questions that are applicable to all members. One commenter (Elevance Health) recommended removing the emergency room as a site of service. 	<ul style="list-style-type: none"> CMS does not recommend revising the questions without cognitive and field testing.
“Getting Health Care from Specialists” Section	<ul style="list-style-type: none"> One commenter (Elevance Health) recommended removing the emergency room as a site of service. 	<ul style="list-style-type: none"> CMS does not recommend revising the questions without cognitive and field testing.

¹ <https://www.federalregister.gov/documents/2023/01/27/2023-01635/initial-proposals-for-updating-ombs-race-and-ethnicity-statistical-standards>

² <https://aspe.hhs.gov/reports/hhs-implementation-guidance-data-collection-standards-race-ethnicity-sex-primary-language-disability-0>

Question # or Section Title	Summary of Public Comments	CMS Response
General Suggestions Terminology	<ul style="list-style-type: none"> One commenter (Elevance Health) recommended removing the term “Qualified Health Plan” from the survey given enrollee’s potential lack of familiarity with the term. 	<ul style="list-style-type: none"> CMS does not recommend revising the terminology of the survey without cognitive testing and field testing.
General Suggestions Addition of Sexual Orientation and Gender Identity	<ul style="list-style-type: none"> One commenter (Elevance Health) recommends that if CMS is interested in adding questions related to sexual orientation and gender identity to the QHP Enrollee Survey, then CMS should clarify the purpose of collecting this data. 	<ul style="list-style-type: none"> CMS will continue to seek feedback through multiple venues, including consulting with the QHP Enrollee Survey TEP, future Draft Call Letters, and conducting focus groups with QHP issuers and enrollees.
General Suggestions Revisions to the QHP Enrollee	<ul style="list-style-type: none"> One commenter (AHIP) recommended that CMS align revision efforts and provide full transparency of these efforts. One commenter (AHIP) noted that in its efforts to shorten questions, CMS complete a full review of the survey and release details of in-depth reviews. 	<ul style="list-style-type: none"> CMS will continue to seek feedback through multiple venues, including consulting with the QHP Enrollee Survey TEP, future Draft Call Letters, and conducting focus groups with QHP issuers and enrollees.
General Suggestions Oversampling	<ul style="list-style-type: none"> One commenter (Elevance Health) noted that CMS should eliminate the 30% cap on oversampling to allow more data collection and allow plans to meet the minimum requirements for calculating an Enrollee Experience Summary indicator. 	<ul style="list-style-type: none"> CMS does not recommend revising the sampling protocols for the 2024 QHP Survey without additional data analyses, testing and feedback from interested parties.
General Suggestions Survey Protocol	<ul style="list-style-type: none"> One commented (Elevance Health) requested that CMS allow survey prenotifications and invitations via text message and/or other electronic means. 	<ul style="list-style-type: none"> The QHP Enrollee Survey protocol allows emails to be sent to enrollees to notify enrollees of the availability of the internet survey. CMS does not recommend allowing text messages without field testing and considering potential restrictions in place by the Telephone Consumer Protection Act (TCPA).