Response to Public Comments

Requirements for the

Inpatient Psychiatric Facility Quality Reporting (IPFQR) Program

CMS-10432, OMB 0938-1171

Our April 10, 2023 (88 FR 21238) proposed rule (CMS-1783-P, RIN 0938-AV06) solicited public comment. As it relates to the PRA, the following comment was received. Our response follows.

Comment: Several commenters expressed concern that the policies under the IPFQR Program will be burdensome, and some commenters specifically noted burden related to the PIX survey. One commenter expressed the belief that removing two measures while adopting four measures would increase overall burden.

Response: We understand commenters' concerns that some of the policies under the IPFQR Program may contribute to IPF reporting burden.

With respect to the PIX survey, we do not believe that administering a patient experience of care survey will be unduly burdensome for the majority of IPFs that previously self-reported that they already administer such a survey when responding to the IPFQR Program's former Assessment of Patient Experience of Care measure. We recognize that there will be some non-recurring burden for these IPFs to transition to the newly adopted survey.

With respect to the concern that removing two measures while adopting four measures would increase the overall burden, we note that the measures we are removing are chart-abstracted measures with high reporting burden. We estimate that the newly adopted measures require less time to calculate and report. Therefore, we believe that our estimate that the overall burden of the IPFQR Program will be decreased by these policies is accurate.