

CMS Response to Public Comments Received for CMS-10537

CMS received one comment related to CMS-10537 (OMB control number 0938-1257) for the Consumer Assessment of Healthcare Providers and Systems (CAHPS) Hospice Survey during the 60-day comment period.

- The commenter supported the addition of a question aimed at identifying and quantifying experiences of unfair or insensitive treatment but is concerned that the frequency-based format of this question may inadvertently suggest an assumption that such treatment did occur. The commenter suggested revising the question to be more inclusive and less assumptive. In addition, the commenter suggested that CMS use an alternative version of the unfair treatment question that examines a broader set of reasons for perceived bias.

Response: CMS thanks the commenter for their support. The unfair treatment question included in the proposed updated CAHPS Hospice Survey questionnaire is the version that CMS tested in a 2021 experiment. Given the unique features of hospice and the caregiver respondents to the CAHPS Hospice Survey, we generally include only those survey items that have been tested among hospice caregivers.

The frequency response scale (never/sometimes/usually/always) used in the proposed question is parallel to the response scale to many questions on the CAHPS Hospice Survey. The "never" response option allows respondents to indicate that unfair treatment did not occur. In the 2021 experiment, 98.8% of respondents selected "never," indicating clearly that respondents did not assume unfair treatment occurred.

- The commenter supported removing redundant phrases (e.g., "while your family member was in hospice care") and adopting gender-neutral pronouns and consolidating the "Getting Hospice Care Training" questions into a singular, comprehensive question.

Response: CMS thanks the commenter for their support.

- The commenter supported the two new item Care Preferences measure.

Response: CMS thanks the commenter for their support.

- The commenter supported CMS' proposal to offer a web-based mode for the Hospice CAHPS survey. They recommend that CMS carefully consider the use of email in the context of hospice care as survey recipients are often in a state of grief.

Response: CMS thanks the commenter for this feedback. We conducted testing of the web-mode for the CAHPS Hospice Survey and did not find any negative effects on response rates or

significant changes in scores. The use of a web-mode increased response rates by 13% among those with email addresses, indicating it is an acceptable and effective option for reaching survey recipients. The web-mail mode included a mailed prenotification letter, providing caregivers with advanced notice of the email survey invitation.

- The commenter supported the use of pre-notification letter but stated that introducing a pre-notification letter incurs additional costs for printing, handling, and mailing, which may be significant, especially for hospices operating under tight budget constraints.

Response: Thank you for this feedback. We conducted testing of introducing a mailed prenotification letter and found that it increased response rates by 2.4%. We do not anticipate that adding a prenotification letter will increase administrative burden for hospices but understand vendors may charge hospices more for the costs associated with a prenotification letter. Mailed prenotification letters increase response to the first survey mailing, thereby reducing costs associated with sending a second mailing. CMS anticipates that any increases in cost will be small relative to the anticipated gains in survey response rates expected from the addition of a prenotification letter.

- The commenter raised that in late March, the Office of Management and Budget (OMB) published a set of revisions to Statistical Policy Directive No. 15 (SPD 15): “Standards for Maintaining, Collecting, and Presenting Federal Data on Race and Ethnicity.” The commenter supported the swift implementation of OMB’s revised standards for the collection of race and ethnicity data and stated that the CAHPS surveys should incorporate the updates promptly.

Response: CMS thanks the commenter for this feedback. We are currently evaluating the best option for implementing the revised standards for collecting race and ethnicity across all CAHPS surveys.