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Office of Management and Budget (OMB)

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Subject: Medicare Advantage, Medicare Part D, and Medicare Fee-For-Service Consumer Assessment of Healthcare Providers and Systems (CAHPS) Survey (CMS-R-246, OMB 0938-0732)

This memo requests approval of non-substantive changes to the approved information collection, Medicare Advantage, Medicare Part D, and Medicare Fee-For-Service Consumer Assessment of Healthcare Providers and Systems (CAHPS) Survey (CMS-R-246, OMB 0938-0732).

Background

The Medicare Advantage (MA), Medicare Part D, and Medicare Fee-For-Service (FFS) CAHPS Surveys are patient experience of care surveys administered annually by CMS. The surveys allow for objective and meaningful comparisons among MA and Prescription Drug Plan (PDP) contracts and between MA and FFS.

CMS began testing a broad array of Medicare Advantage (MA) health plan innovations that aim to enhance the quality of care for Medicare enrollees through the MA Value-Based Insurance Design (VBID) Model in January 2017. Two questions that asked about supplemental benefits were added to the MA CAHPS Survey to collect data for the VBID Model. The VBID Model ends December 31, 2025.

OMB approved the revised collection on November 13, 2024 to include a question about the receipt of unfair treatment due to a variety of factors, including race or ethnicity, income, medical condition, sexual orientation, and gender identification. Pursuant to [Executive Order 14168](#), “Defending Women From Gender Ideology Extremism and Restoring Biological Truth to the Federal Government”, CMS sought and received approval on April 30, 2025 to remove the voluntary sexual orientation and gender identity response options from the voluntary question about unfair treatment on the Medicare Advantage (MA) and Medicare Fee-For-Service (FFS) CAHPS surveys. Due to the proximity to the start of survey 2025 fielding, we requested to only remove two response options to avoid a larger change that could impact the timing and accuracy of survey implementation.

On March 29, 2024, OMB announced revisions to the [Statistical Policy Directive No. 15: Standards for Maintaining, Collecting, and Presenting Federal Data on Race and Ethnicity \(SPD 15\)](#). Federal agencies are required to bring information collections into compliance with SPD 15 be-

fore or by March 28, 2029. OMB approved CMS's intent to implement Figure 3 for the updated SPD 15 race and ethnicity question on November 13, 2024. We are using Figure 3 to ensure comparability of responses across mail, telephone, and web administrations in particular for an older population.

Overview of Requested Changes

CMS is proposing to remove the two questions associated with the MA VBID Model, which is ending on December 31, 2025 from the Medicare Advantage (MA) CAHPS surveys. The questions being considered for removal asked enrollees about supplemental benefits they may have received from their MA plan. This is an opportunity to shorten the survey since the data are no longer needed. The data from these questions are not used to calculate scores for Star Ratings.

In response to [recent Executive Orders](#), CMS is proposing to remove the question about unfair treatment on the Medicare Advantage (MA) and Medicare Fee-For-Service (FFS) CAHPS surveys.

In accordance with SPD 15, CMS is also requesting to replace the current race and ethnicity survey questions with the 2024 SPD 15's Figure 3 on the MA-PDP, MA-Only, PDP, and FFS CAHPS surveys.

These changes remove three questions, making the form shorter, and update the questions about race and ethnicity to conform to SPD 15. The changes do not add any new questions, requests for information, or available response options. We do not expect a change in burden. Upon receiving OMB approval, CMS will update the survey instruments, guidance manuals, webpage, etc., and communicate these changes to the survey vendors. We are requesting OMB's approval of the non-substantive changes as soon as possible to comply with the Executive Orders and SPD 15, and to remove survey questions that are no longer needed for the MA VBID Model.