

**CMS Responses to Public Comments Received for the Medicare Current Beneficiary Survey (MCBS)
Respondent “Pulse” Feedback, CMS-P-0015A**

The Centers for Medicare and Medicaid Services (CMS) received two comments related to the Medicare Current Beneficiary Survey (MCBS) Respondent “Pulse” Feedback generic clearance request. Each comment is summarized and briefly addressed below. The comments can also be found in Attachment A.

Comment:

Dr. Nakul Karkare provided a two-fold comment, 1) expressing support for the MCBS Pulse, and 2) offering deterministic procedure coding services.

Response:

CMS appreciates the commentor’s support for the value of the MCBS Pulse as well as the commentor’s input about the importance of consistent data processing. CMS will take this feedback under advisement and assess whether further review or research is warranted to evaluate coding accuracy.

Comment:

CMS received a comment from the Conservative Political Action Coalition Foundation (CPAC Foundation) Center for Regulatory Freedom (CRF) offering conditional support for the MCBS Pulse. CRF recognizes the importance of timely beneficiary feedback yet expressed concerns about the generalizability of MCBS Pulse data given that each Pulse survey will be brief and administered over a short period of time to a limited number of beneficiaries. CRF encourages CMS to articulate clear parameters governing the use of Pulse survey data for decision-making, commit to transparency in the design and implementation of Pulse surveys, and incorporate mechanisms for ongoing evaluation of the MCBS Pulse process.

Response:

CMS appreciates the thoughtful considerations raised by CRF. CMS is committed to ensuring that decision-making requiring robust, nationally representative data will continue to use rigorous survey sampling, design, and weighting methods that maximize relevance, accuracy, and reliability. The generic clearance mechanism for MCBS Pulse is intended for a specific purpose—to offer quick-turnaround directional insights to support CMS’s rapid data needs, rather than to provide rigorous, generalizable findings. For each set of results, CMS will carefully evaluate the quality of the data and clearly document what is known about the validity, accuracy, and the appropriateness of the data for a given purpose. The data will be disseminated internally at CMS for program planning purposes and any internal use will consider the strengths and limitations of data collected through the Pulse’s rapid approach. Through these standard procedures, CMS will ensure that MCBS Pulse data are used appropriately for programmatic decision-making and with the necessary guardrails to ensure that the validity of results are clearly communicated.