

CMS Response to Public Comments Received for CMS-10450

The Centers for Medicare and Medicaid Services (CMS) received comments from individual submitters. This is the reconciliation of their comments.

Comment:

The commenter supports CMS's efforts to improve patient experience reporting and physician quality measurement but urges the agency to ensure that survey processes do not impose unnecessary administrative burden on providers or survey vendors. The commenter states that adding the web-based survey option is a positive step that can streamline administration, reduce delays, and increase patient participation by offering more convenient response pathways compared with traditional mail or phone methods. At the same time, the commenter emphasizes that CMS should maintain simplicity in survey requirements to avoid diverting time and resources from patient care. The commenter concludes that while quality reporting is important, CMS should adopt a balanced approach that enhances patient feedback mechanisms while minimizing administrative stress on healthcare teams.

Response:

We appreciate the commenter's support for adding a web-based survey mode to the CAHPS for MIPS Survey. The survey will continue to be administered exclusively by CMS-approved survey vendors—this creates a business opportunity for survey vendors and minimizes the administrative burden on providers. The additional web-based survey mode will increase participation in the survey and reduce reliance on more resource-intensive mail and phone survey modes. We remain committed to ensuring that the CAHPS for MIPS Survey provides meaningful patient experience information while avoiding unnecessary burden for healthcare providers.

Comment:

The commenter recognizes the value of the CAHPS for MIPS survey in capturing the patient voice within quality measurement but expresses concern that its implementation and oversight impose disproportionate administrative and operational burden on smaller specialty groups, hospitals, and health systems. They urge CMS to streamline reporting requirements—particularly as the program moves toward mandatory MIPS Value Pathways—to avoid excessive burden for clinicians and survey vendors. The commenter encourages CMS to ensure that collected data remain timely and meaningful without introducing new financial or operational penalties, and supports modernizing survey administration, such as adopting seamless web-based options, to improve response rates while minimizing regulatory burden on care teams.

Response:

We appreciate your support for the CAHPS for MIPS survey and agree that it is an important tool for assessing patient experience of care. The survey continues to be administered solely through CMS-approved survey vendors, which helps limit administrative and operational responsibilities for participating clinicians. The additional web-based survey mode will increase participation in the survey without increasing regulatory burden and may even lower survey administration costs by reducing reliance on the mail and phone survey modes to reach survey respondents. We remain committed to monitoring vendor and clinician burden and ensuring that patient experience data are collected in a timely, useful, and equitable manner.

Comment:

The commenter appreciates the importance of patient feedback in improving healthcare quality and notes that effective communication before and after procedures can significantly enhance patients' overall experiences, particularly for those who are anxious or medically fragile. They urge CMS to ensure that patient experience measures, such as CAHPS, are used in conjunction with objective quality metrics and account for the complexities of caring for vulnerable populations. As healthcare is trending towards more value-based reimbursement, the commenter stresses that these surveys should still support meaningful quality improvement while also providing a fair assessment of clinicians—including CRNAs, anesthesiologists, surgeons, and other providers—whose compensation and performance may be influenced by such surveys and measures.

Response:

We appreciate the commenter's perspective and agree that patient experience offers important insight into the quality of perioperative care, particularly for patients who may be anxious or medically vulnerable. The CAHPS for MIPS Survey is designed to complement, not replace, objective clinical quality measures, and it is administered at the group, virtual group, subgroup, or APM Entity level to support fair and reliable assessment across provider types. Patient experience data serve as one component of the MIPS quality performance category and are considered alongside outcome-based and other clinical measures. We remain committed to ensuring that the CAHPS for MIPS Survey supports meaningful quality improvement while maintaining an equitable evaluation framework for clinicians, including those caring for complex or high-risk patient populations.