

PUBLIC SUBMISSION

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Consumer Assessment of Healthcare Providers and Systems (CAHPS) Survey for Merit- based Incentive Payment Systems (MIPS) (CMS-10450)

Comment On: CMS-2026-1684-0001

Consumer Assessment of Healthcare Providers and Systems (CAHPS) Survey for Merit- based Incentive Payment Systems (MIPS) (CMS-10450)

Document: CMS-2026-1684-0003

Comment on CMS-2026-1684-0001

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General Comment

Document CMS-2026-1684-0001

The CAHPS for MIPS survey is an important tool for capturing the patient's voice in care quality, but the administrative burden of such implementation and oversight will be disproportionately high for smaller specialty groups, hospitals and systems. The push for mandatory MIPS value pathways in the future will need the Agency to streamline reporting protocols.

The hope would be that CMS carefully evaluates the burden placed on survey vendors and participating clinicians to ensure that the data collected is done in a timely manner, valuable, and doesn't create undue financial or operational penalties. Modernizing survey delivery-such as seamless web integration, to improve response rates without increasing regulatory burden on the clinical care team.