

Appendix A – Response to 60-day Comments

Two commenters provided general suggestions for the survey. The first commenter shared concerns about the accuracy of the 10-minute response time estimate and notes that completion of the survey took longer than expected. In 2025, the median response time for the internet version of the QHP Enrollee Survey was 10 minutes. Given the total number of questions on the survey has not changed, CMS will retain the estimated response time of 10 minutes for the 2027 QHP Enrollee Survey. CMS will continue to monitor response time and adjust as needed to maintain accuracy and transparency for respondents taking the survey.

The second commenter shared a suggestion to use a proprietary procedure coding system to improve survey integrity. CMS also prioritizes survey result integrity but is not considering implementing the commenter's proposed coding system at this time as procedure codes are not used in fielding the QHP Enrollee Survey.

The third commenter expressed support for fair information collection. CMS appreciates the commenter's support.

The fourth commenter expressed concerns that the proposed modifications to the survey content and structure may impact longitudinal comparability and measure integrity, and emphasized the importance of carefully considering such changes given the survey's use for regulatory oversight, accreditation, and performance evaluation. The commenter also expressed concerns that the proposed modifications to the survey protocol may increase respondent burden, as well as decrease the ability for comparability while creating opportunities for gaming or unintended bias. Lastly, the commenter expressed concerns that the proposed modifications to the survey protocol may increase respondent burden, as well as decrease the ability for comparability while creating opportunities for gaming or unintended bias. The commenter recommended that CMS adopt enhanced methodological transparency requirements and provide detailed documentation of proposed changes; establish clear, transparent requirements governing the frequency and scope of survey revisions; define clear parameters and disclosure requirements to ensure sampling practices are consistent, transparent, and analytically sound; and adopt a more comprehensive approach to burden

assessment to include the full lifecycle costs associated with survey implementation.

CMS appreciates the commenter's feedback regarding the potential implications of the proposed modifications and shares the commenter's goal of collecting reliable data that promotes meaningful comparisons while minimizing respondent burden. The QHP Enrollee Survey uses questions from the CAHPS Health Plan Surveys. The measures derived from a subset of survey questions are included in the QRS measure set and accompanying ratings, which provide comparable and useful information to Exchange consumers. CMS selected these measures in alignment with its Meaningful Measures 2.0 initiative, aimed at identifying the highest priority areas for quality measurement and improvement. CMS believes the survey measures are critical in obtaining valuable information related to enrollee experience, and changes to the survey are evaluated by TEP members representing consumer voices, survey experts, and QHP issuers. With respect to longitudinal comparability and measure integrity, the question changes are in alignment with the CAHPS 5.1 survey questions, which were also informed by extensive testing and interested party engagement. The questions used in the survey measures themselves remain unchanged. As a result, CMS does not believe that the proposed updates will compromise the ability to track performance over time or undermine the integrity of the measures and will continue to meet the goals established for the QHP Enrollee Survey.

Regarding concerns about respondent burden, comparability and gaming due to changes in the survey protocol, CMS has assessed the burden associated with these changes and determined that it remains minimal and justified, as operational adjustments are intended to increase response rates so that plans are more likely to achieve reportability. Participation in the survey remains voluntary for sampled enrollees. CMS maintains a detailed and standardized sampling process, including a process for approving oversampling requests. As outlined in Supporting Statement B, CMS also publishes the methodology for case-mix adjustment and assesses survey results for potential bias through annual non-response bias analyses, as required by OMB.

CMS thanks the commenter for their recommendations and can confirm that CMS maintains transparent processes regarding survey methodology and sampling, as

detailed above. CMS provides information on survey revisions via the Draft Call Letter process for the QRS and QHP Enrollee Survey, where details on revisions, including rationale and impact on results, are published. CMS also publishes survey specifications and methodological approaches on the Marketplace Quality Initiatives website. Please note, implementation of the QHP Enrollee Survey, including burden on QHP issuers and survey administration oversight, is covered under a separate information collection request (OMB Control Number 0938-1249; Expires 02/28/2029).