We are a CMS-approved third-party survey vendor for the ICH CAHPS Survey and have administered the survey for 14 years.

For this open comment period, we have three recommendations for the best way to incorporate an online element to the ICH CAHPS survey:

1. Add emails in the mixed-mode protocol and the timing

During a June 2024 site visit, we outlined a possible timeline for adding email contacts to the mixed-mode protocol, which we still think is worth consideration.

We remain very interested in CMS's process exploring the possibility of adding a web response mode to the survey. We were surprised on the 2024 vendor training to learn that web was added in a protocol consisting of just one mailing plus a web invitation, either via email or a mailed letter. Generally, a single email invitation will not yield as many responses as a mailing, but part of the advantage of email is how quickly it operates – rather than waiting weeks for responses to come back, most return in a couple of days, so you can fit them in a few days. Typically when email is involved, CSS will send 2-3 email invitations in the span of 1-2 weeks in order to get the cumulative response rate necessary to function as a mail replacement. The other factor to keep in mind is that email in replacement of a mailing is only effective if you had broad email availability in the sample, which we are assuming is limited in this population.

We support CMS's push for allowing email/web surveys as a survey mode; however, we recommend it be added to the mixed protocol while not altering the total length of time in the field. That timeline could look like:

- Prenotification letter mailing
- Approx. 4 days after prenote: email 1
- Approx. 7 days after prenote: email 2
- 3 weeks after prenote: mail wave 1
    - This provides for 2 weeks after email 2, sufficient time to collect web responses and remove people from the mailing. If we did not remove web respondents, then we could do this as soon as ~4 days after the prenotification letter.
- 7 weeks after prenote: Start CATI
- 12 weeks after prenote: Finish CATI

This keeps things within the existing project timeline by using the existing time between the prenote and wave 1 to send emails (2 weeks is too short to remove anyone from wave 1 given current USPS delivery speed) and shortening the CATI window from 6 weeks to 5. Two email attempts early in data collection also would align with the protocol implemented on the Medicare Advantage & Prescription Drug Plan (MA & PDP) CAHPS Survey.

2. Include a survey URL and personal access code (WebID) on Prenotification Letter

In 2014 and June 2022, we recommended that CMS print a survey URL and personal access code directly on the prenotification letter sent to all sampled patients, regardless of assigned mode. Notably, CMS

had already used this design on the QHP Enrollee Experience Survey. This was also adopted in 2024 for the MA & PDP CAHPS Survey. The prenotification letter currently does not offer respondents an option to respond to the survey, so it avoids response rate concerns around having multiple modes of response that would exist if the web option was added to a mailing package.

We think that introducing the web option at first contact is a low-cost change that could improve uptake and reduce downstream mail and telephone burden. This option is also cost neutral if the web survey already needs to be programmed for the now available email invitation protocol.

3. Add a QR code

In August 2024, we confirmed that we can include a QR code on mailed survey materials linking to the web survey, with a unique identifier embedded so a response can be matched to the sample patient after scanning the QR code. This allows the sample patient to directly access the survey associated with their tracking ID without the need to enter a separate survey code. We would recommend including a QR code any time an invitation with a web link is mailed, be it in a new letter inviting members online or in our above recommendation to add an online option to the existing Prenotification Letter.

Recommendations

1. Multiple email attempts where an email is available, followed by standard protocol
2. Add a URL to the prenote letter and cover letters
3. A QR code on mail materials (with trackable personal code)