

Kaiser Permanente Comments on Notice of Information Collection:  
Medicare Advantage, Medicare Part D, and Medicare Fee-For-Service  
Consumer Assessment of Healthcare Providers and Systems (CAHPS) Survey

January 8, 2021

Kaiser Permanente appreciates the opportunity to provide feedback on the revision of the Consumer Experience Survey Data Collection and the 2021 Medicare Advantage, Medicare Part D, and Medicare Fee-For-Service Consumer Assessment of Healthcare Providers and Systems (CAHPS) Survey.<sup>1</sup>

### **General Comments**

We are concerned that the current CAHPS 5.0 survey does not adequately capture the shifts in care delivery, both during the coronavirus pandemic and more generally. Specifically, the current Medicare CAHPS survey, being oriented solely towards in-person visits, is excluding a large portion of Medicare members who have received care through a telephone or video visit. If changes are not made to the survey, this could result in the systematic exclusion of a group of respondents and may not be a true reflection of how enrollees are now receiving care. For this reason, Kaiser Permanente strongly recommends modifying the Medicare CAHPS (MCAHPS) survey to address the increased use of telehealth.

This issue is particularly urgent in light of CMS' intent to increase the weight of CAHPS-based quality measures from 2 to 4 in the 2023 Star Ratings. This will make CAHPS-based measures the heaviest weighted measure group in the Star Ratings. If the health plan member voice is to be amplified, it is critical that enrollees be provided thorough and accurate instructions to guide their interpretation of each question.

### **Results of KP's 2020 Off-Cycle CAHPS Survey**

Our internal data shows that, unless they are expressly told to do so, many enrollees are not inclined to recall virtual care when answering CAHPS questions about their care experiences. Evidence of this can be found in results from Kaiser Permanente's "mock" or "off-cycle" MCAHPS survey conducted in Fall 2020. This survey is almost identical to the official spring Medicare CAHPS survey in content, mode and population.

Almost 1 in 4 survey respondents indicated they only had a telehealth visit in the past 6 months. For those members who only had telehealth visits, only 47% said they made an appointment, 42% said they visited the doctor's office 1 or more times and 50% said they visited their PCP 1 or more times. This is substantially lower than the 2019 CMS national average of 84% indicating making an appointment, 85% visiting the doctor's office 1 or more times, and 88% visiting their PCP 1 or more times. Without additional guidance/instruction related to telehealth (phone and/or video), many members were clearly not considering telehealth visits when answering the questions.

---

<sup>1</sup> 85 Fed. Reg. 71344 (Nov. 9, 2020).

## Comparison with the 2021 Health Plan CAHPS Survey

In Spring 2021, the National Committee for Quality Assurance (NCQA) will administer a new version of the Health Plan commercial CAHPS survey (CAHPS 5.1). This updated version asks members to consider telehealth (in addition to in-person visits) when answering the survey questions. In Fall 2020, Kaiser Permanente tested an early version of the 2021 Commercial CAHPS 5.1 survey alongside the 2020 version (CAHPS 5.0) and was the only health plan in the country doing a side-by-side test of the two surveys, allowing for advanced knowledge of the potential impact of survey changes. Preliminary results show that the current commercial CAHPS 5.0 survey, which is focused on in-person encounters, does not adequately capture the different ways in which members are now receiving care. The inclusion of telehealth in the 5.1 version resulted in more members taking their telehealth into consideration when responding to the survey. In addition, among those who only had a virtual visit and were given the CAHPS 5.0 survey, only 50-60% said they made an appointment, visited the doctor's office 1 or more times, or visited their PCP 1 or more times. For those who only had a virtual visit and were given the CAHPS 5.1 survey (with telehealth updates), reported utilization was significantly higher than the 5.0 version, and similar to utilization reported in Fall 2019. This not only shows the current survey is not effectively measuring virtual care, but that the wording changes in 5.1 do a significantly better job at capturing how enrollees are now receiving care.

## Recommendations

Below we include comments on specific proposed revisions to the 2021 MCAHPS Survey. Our suggested changes are indicated below (~~strike through~~ or **bold underline**) and closely align with the changes made by NCQA on the 2021 CAHPS 5.1 survey.

### Survey Instructions

We recommend a minor edit to the main instructions: *“This survey asks about you and the health care you received in the last six months. Answer each question thinking about yourself **and the times you got health care in person, by phone or by video call.**”*

### Specific Question Modifications

Kaiser Permanente is recommending updates to Questions 3-8, 11, 12, 18 and 28-31 to incorporate instructions to capture enrollees' experience receiving virtual care. For questions about access to care, CMS should consider revising references to specific sites of care to reduce confusion about whether to consider virtual visits along with in-person care. Other changes, such as using “seen or spoken with” as opposed to “seen”, would help ensure respondents consider telehealth visits when answering these questions. We also suggest using “in-person” when used as a modifier (e.g., an in-person visit versus seeking care in person).

For example:

Question 3. *“In the last 6 months, did you have an illness, injury, or condition that needed care right away ~~in a clinic, emergency room, or doctor's office?~~”*

Question 4. “In the last 6 months, when you needed care right away, how often did you get care as soon as you needed? **Include in-person, telephone or video appointments.**”

Question 5. “In the last 6 months, did you make any appointments for a check-up or routine care ~~at a doctor’s office or clinic?~~”

Question 6. “In the last 6 months, how often did you get an appointment for a check-up or routine care ~~at a doctor’s office or clinic~~ as soon as you needed? **Include in-person, telephone or video appointments.**”

Question 7: “In the last 6 months, not counting the times you went to an emergency room, how many times ~~did you go to a doctor’s office or clinic to get health care for yourself?~~ **did you get health care for yourself in person, by phone, or by video?**”

Question 8: “Wait time includes time spent in the waiting room or exam room, **or waiting for a phone or video appointment.** In the last 6 months, how often did you see **or speak with** the person you came to see within 15 minutes of your appointment time?”

Question 11: “A personal doctor is the one you would see **or speak with** if you need a check-up, want advice about a health problem, or get sick or hurt. Do you have a personal doctor?”

Question 12: “In the last 6 months, how many times did you visit **or speak** with your personal doctor to get care for yourself?”

Question 18. “In the last 6 months, when you visited **or spoke with** your personal doctor for a scheduled appointment, how often did he or she have your medical records or other information about your care? **Include in-person, telephone or video appointments.**”

Question 28. “In the last 6 months, did you make any appointments to see **or speak** with a specialist?”

Question 29. “In the last 6 months, how often did you get an appointment to see **or speak** with a specialist as soon as you needed? **Include in-person, telephone, or video appointments.**”

Question 30. “How many specialists have you seen **or spoken with** in the last 6 months? **Include in-person, telephone, or video appointments.**”

Question 31. “We want to know your rating of the specialist you saw **or spoke with** most often in the last 6 months. Using any number from 0 to 10, where 0 is the worst specialist possible and 10 is the best specialist possible, what number would you use to rate the specialist?”

### Additional Questions

Kaiser Permanente also recommends adding questions that ask members to list all the types of visits they experienced in the last 6 months. This would allow analysis of respondents who may

have only had virtual care, only in-person, or both. For example: *“In the past 6 months, have you received any of the following types of care? Please select all that apply.”*

- a. Came in for an in-person visit at a medical office
- b. Had a phone appointment (a scheduled time when a provider called you instead of you having to come into a medical office)
- c. Had a video visit (you met with a provider by video using a camera on your computer or mobile device)
- d. Chatted with a provider using a real-time online messaging application
- e. E-visits (complete a short online questionnaire about your symptoms and receive a care plan)
- f. Other
- g. Did not have a visit or other type of care in the past 6 months

\* \* \*

Kaiser Permanente appreciates CMS’ consideration of these comments and looks forward to working with CMS to support modifications to the MCAHPS Survey that help capture important information about patient experiences with telehealth visits. Please contact Tom Cieszynski ([tom.cieszynski@kp.org](mailto:tom.cieszynski@kp.org)) or Blake Hodges ([blake.e.hodges@kp.org](mailto:blake.e.hodges@kp.org)) with questions or concerns.