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Office of Management and Budget  
Office of Information and Regulatory Affairs  
Attention: CMS Desk Officer  
Document Identifier: CMS- 10275

Dear Sir or Madam,

Please accept these comments for the proposed Home Health CAHPS information collection activities. We believe the Home Health CAHPS initiative is very positive for the home health industry and encourage agencies to participate in the national implementation. Incidentally, Dr. Robert Fazzi and I recently published an article, Five Good Reasons Why CMS's New CAHPS Patient Satisfaction Survey Is Good for Agencies and Good for Patients, in the April 2009 Caring Magazine.

Fazzi Associates, Inc. is a home health consulting firm that conducts national best practice research studies while also having some of the oldest and most respected national operational, financial and patient satisfaction best practice programs. Earlier this month, we conducted an informational webinar on the proposed Home Health CAHPS initiative. Approximately 400 participants joined the webinar. During the webinar, we conducted 4 polling questions. Here are the questions and results:

**1. Do you currently collect patient satisfaction results? (85% participation in poll)**

Yes = 96%

No= 4%

This was a group clearly experienced with surveying their patients.

**2. Which mailing option are you likely to choose? (85% participation in poll)**

Mail only= 49%

Telephone Only= 6%

Mail with Phone follow up= 32%

Don't know= 13%

It is clear that mail survey will be the initial mode used by most agencies. We were surprised by the number who planned on using mail and phone (32%)

**3. If you collect patient satisfaction, which group do you survey? (85% participation in poll)**

Discharged patients only= 61%

Active patients only= 3%

Both discharged and active patients= 36%

For many of the agencies (61%), having active patients also surveyed will be new.

**4. Do you support the CAHPS concept - standardized survey and reporting? (85% participation in poll)**

Yes= 72%

No= 11%

Don't know= 17%

Introducing CAHPS to Home Care is clearly introducing it to a field that is excited and highly supportive of this effort.

We would also like to make a three recommendations based on our nearly twenty-five years of experience doing patient satisfaction and other patient types of surveys.

**1. Consider Requiring a Letter Be Sent to All Patients Who Will Be Receiving Phone Surveys:**

At present, there is no requirement for a pre-notice. Our experience with seniors is that they are far more comfortable responding to a phone call from a stranger when they know in advance that a call will be coming. An advance letter can be positive, respective and respond to senior worry about invasion of privacy. It would also help increase return rates.

**2. Consider a Slightly Revised Survey for Patients Receiving Services Versus Those**

**Discharged:** The response of a patient during the time they are receiving services might be significantly different if they felt their response was going to be seen by their caregivers. There is the factor that if they are honest, it might impact how they are treated. We recognize that you are dealing with this issue using statistical means but we feel it is worth mentioning.

**3. Consider Focusing on Discharge Patients and Requiring Surveys to Be Sent Within One**

**Week of Discharge:** The systems that most vendors have have this capacity. Tying the survey closely to discharge might reinforce to the patient that their agency truly cares and it may also lead to higher return rates and more honest responses.

Please know that we are incredibly excited and supportive of the CAHPS program. Patient's perceptions are valid and critical to the creation of a more responsive, caring home based health care system and your movement in this direction is not only warranted, but deeply appreciated.

Thank you for reviewing this feedback. We hope you find it helpful. Please do not hesitate to contact us with any questions you may have.

Dr. Robert Fazzi, President

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Fazzi Associates, Inc.

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