



October 4, 2023

William N. Parham, III
Director, Paperwork Reduction Staff
Division of Regulations Development
Office of Strategic Operations and Regulatory Affairs
Centers for Medicare & Medicaid Services
Room C4-26-05
7500 Security Boulevard
Baltimore, Maryland 21244-1850

Attention: Document Identifier/OMB Control Number: CMS-10102 (OMB control number: 0938-0981)

Dear Mr. Parham:

Kaiser Permanente appreciates the opportunity to provide comments on the Centers for Medicare & Medicaid Services' (CMS) intention to collect information from the public with respect to the Hospital Consumer Assessment of Healthcare Providers and Systems (HCAHPS) Survey (Form CMS-10102, OMB control number: 0938-0981).

The Kaiser Permanente Medical Care Program¹ is the largest private integrated health care delivery system in the United States, with more than 12.7 million members in eight states and the District of Columbia. Kaiser Foundation Health Plan, Inc., one of the nation's largest not-for-profit health plans, and all our health plan subsidiaries are Medicare Advantage plans, serving a total of more than 1.8 million Medicare beneficiaries. Kaiser Permanente's mission is to provide high-quality, affordable health care services and to improve the health of our members and the communities we serve.

We appreciate the summary analyses, technical specifications and datasets CMS shares to make HCAHPS data more transparent to the users of these quality measures. Like CMS, we believe that the HCAHPS Star Ratings system should make it easier for consumers to choose a hospital based on their understanding of the quality of care they deliver; promote the Department of Health and Human Services' (HHS) goal of building a health care system that delivers better care; lead to spending health care dollars more wisely; result in healthier people; and encourage hospitals to strive for continuous improvement in patient experience and quality of care.

To enhance the ability of HCAHPS users to analyze the data and assess their performance, we request that CMS share the linear mean scores for the individual composite measures. This information can be added to the data included in Provider Data Catalog HCAHPS datasets, and

¹ Kaiser Permanente comprises Kaiser Foundation Health Plan, Inc. and its health plan subsidiaries outside California and Hawaii; the not-for-profit Kaiser Foundation Hospitals, which operates 39 hospitals and more than 600 other clinical facilities; and the Permanente Medical Groups, self-governed physician group practices that exclusively contract with Kaiser Foundation Health Plan and its health plan subsidiaries to meet the health needs of Kaiser Permanente's members.

also with the linear mean percentiles (5th, 10th, 25th, 50th, 75th, 90th, and 95th percentiles) included with the summary data available on HCAHPS Online. CMS already releases the same information for these measures in “top box” format; we are simply requesting that CMS also provide the same scores in linear mean format. Because CMS combines the two “bottom box” response options on the composite measures (because of low N) in its current reporting, we are unable to calculate these scores ourselves with the available data.

We believe that with more available data from CMS on the HCAHPS composite measures, hospitals will be better positioned to track and improve their performance across the distribution of scores in each measure, rather than focus their efforts on the global top box ratings. Top box scores provide meaningful information for the subset of patients who selected a particular response option, but do not provide the full insight into how all patients responded that linear mean scores provide.

In order to use the HCAHPS summary star as the basis for HCAHPS performance, hospitals must have access to meaningful and actionable comparative data beyond summary star rating itself. By publicly releasing the linear means scores for each individual composite measure, CMS would enable hospitals to analyze and track performance on a more granular level across patient subpopulations. This, in turn, would support hospitals in enhancing the experience and quality of care provided to all patients. In addition, releasing these data is consistent with CMS’ focus on summary star performance as the most important measure of overall patient experience.

Thank you for your consideration of our feedback in response to this solicitation of public comments. Please do not hesitate to contact Gregory Berger at gregory.b.berger@kp.org if we may provide additional information or answer any questions.