

OASIS Alert

Patient Satisfaction: CAHPS DEADLINE JUST AROUND THE CORNER

Apply for exemption by June or face payment hit.

If you've been putting CAHPS on the back burner while tackling OASIS C and other concerns, now's the time to move it up before you get burned.

Starting in 2012, the **Centers for Medicare & Medicaid Services** will reduce home health agencies' prospective payment system payments by 2 percent if they don't report patient satisfaction survey data under the new Home Health Consumer Assessment of Healthcare Providers and Systems (CAHPS) program.

The patient satisfaction survey data will be publicly reported on Home Health Compare starting in spring 2011, noted CMS's **Elizabeth Goldstein** at the **National Association for Home Care & Hospice's** March on Washington annual meeting. Then the data will get updated quarterly.

Background: HHAs that participate in the CAHPS program must contract with a third party vendor to conduct patient satisfaction surveys that include 34 core required questions and nine optional ones. Agencies may also add their own unique questions to the tool, CMS explained in last year's PPS rate update notice. Agencies must strive to obtain 300 survey completions per year.

Although 2012 sounds far away, "you need to start data collection now," Goldstein emphasized at the meeting.

Under the CAHPS requirements, agencies must conduct a "dry run" of survey data collection in July, August, or September of this year, Goldstein said in an April 12 session. Then ongoing data collection begins in October.

"The dry run period is really valuable," Goldstein said. Agencies can use it to iron out any kinks in the survey process with their new vendor. "If you mess up, it's OK to mess up in the dry run period," she reassured attendees.

Tip: There is no requirement of how much data an agency must report during the dry run, Goldstein added.

CMS has 41 vendors currently approved for CAHPS data collection, Goldstein reported. "This list will go up over time," she predicted. But you must "look at the vendor list as soon as possible" so that you have enough time to select one in time to do the dry run," urged **Lori Teichman** in CMS' April 14 Open Door Forum for home care providers.

CMS began allowing CAHPS data collection in October 2009 and the first data has begun coming in, Goldstein noted.

Note: HHAs that serve less than 60 survey-eligible patients annually are exempt from the CAHPS requirement. However, they must fill out an exemption application or lose the 2 percent off their 2012 reimbursement rates.

The applications are due by June 16, Goldstein stressed. "I encourage you to get it done as soon as possible," she told agencies. CMS has begun receiving applications already, she reported.

CAHPS Data To Hit Home Health Compare Next Spring

While CAHPS data will be reported on Home Health Compare, not every question will be listed because that would be too overwhelming for consumers, Goldstein explained.

Instead, the site will report three composite measures on care of patients, communication between providers and patients, and specific care issues. It also will display two global ratings on the agency -- an overall score and a measure on patient willingness to recommend the HHA to family and friends.

CMS and its contractor are working on a risk adjustment model for the patient survey data now, Goldstein said.

For example: Patients with more education tend to be "pickier" and give agencies lower scores, Goldstein pointed out. The risk adjustment model will take such demographic information into account.

CMS and its contractor are also conducting a "mode experiment" to see whether data differs based on how it's collected - by mail or phone. In other CAHPS settings like hospitals, phone responses tend to be more positive than mail ones, Goldstein noted. If that's the case in home care, the risk adjustment model will take the mode into account.

Clarification: Your CAHPS survey data will still be displayed on Home Health Compare, even if you don't reach the 300-survey goal, Goldstein pointed out in response to a question from an attendee.

As long as you survey all of your eligible patients, you won't be held at fault if you don't reach the 300 mark, Goldstein said in response to another question. As long as you are following the CAHPS protocols, you'll be fine, she assured.

Tip: Your patients may have difficulty filling out the surveys, but you aren't allowed to help them with it at all, Goldstein emphasized. That means you can't even read the questions for them.

Unlike in some other CAHPS settings, CMS will allow a proxy to fill out the survey for the patient, she added. That means family or friends can complete the survey.

Keep in mind: If you want to opt out of the survey and take the 2-percent hit, CMS will allow it. "Agencies may still choose not to participate in the survey if they believe that the costs of participating will exceed the 2-percent reduction of the full annual payment update they would otherwise receive," CMS stated in the 2009 PPS final rule.

CAHPS simply isn't for everyone, notes Chicago-based regulatory consultant **Rebecca Friedman Zuber**. "It will make sense for some agencies not to do it ... because the financial hit will be less than the cost," she observes.

However, you shouldn't write it off forever. CMS may just make CAHPS mandatory after a test run, experts forecast, and you'll have to scramble to catch up on the requirement. Also, because the CAHPS data will be publicly reported on Home Health Compare, you won't look the same as your other competitors who do have data displayed, which "does not make good business sense," warns consultant **Betty Gordon** with **Simione Consultants** in Westborough, Mass.

Lacking that CAHPS data "will make the non-participant agencies look like they don't care, and that will be bad in a competitive market," Friedman Zuber stresses.

Do this: Carefully weigh the potential costs of having to catch up to the industry with the cost of implementing the survey. Now that you know pretty much what CMS is planning, the time to revisit all your options is now, industry experts urge.

More information and resources on CAHPS, including the exemption application and the list of vendors, is at www.homehealthcahps.org.