

## OASIS Alert

### Patient Satisfaction:CAHPS Deadlines Stands Firm, CMS Says

#### But you still have time to head off payment penalties.

There's bad news for those whose holiday wish list includes a delay to the Home Health Consumer Assessment of Healthcare Providers and Systems (CAHPS) patient satisfaction survey requirement.

The **Centers for Medicare & Medicaid Services** nixed agencies' requests to delay the Consumer Assessment of Healthcare Providers and Systems requirement, according to the PPS final rule published in the Nov. 17 Federal Register.

Hefty penalty: Under the CAHPS provision, agencies will see a 2-percent pay cut in 2012 if they fail to start submitting CAHPS data for this quarter. "We are not delaying the HHCAHPS requirement,"

CMS says in the rule. "Our data, as of mid-October 2010, show that nearly 8,000 Medicare-certified HHAs have either applied for an exemption from participation in HHCAHPS or registered for credentialing to begin HHCAHPS."

CMS already put off the CAHPS requirement once, it adds. "HHAs have had sufficient notice of the HHCAHPS requirements and ... we do not need to delay," the rule says.

Upside: However, CMS did agree to extend the deadline to submit an application for a CAHPS exemption. The new deadline is Jan. 21. HHAs are exempt from the requirement if they serve less than 60 CAHPS-eligible patients in the year at issue.

Agencies will have to reapply for the exemption every year, CMS says.

Big job: To meet the goal of 300 survey completions, you'll probably have to have your vendor survey more than 600 patients, new data from CMS reveals. In a survey mode experiment this summer, the response rate was about 45 percent.

But "as long as the HHCAHPS survey protocols are followed and ... the random sampling is completed correctly, the response rate of the HH-CAHPS is not of great concern," CMS says. "We have not designated a minimum survey response rate requirement for the HHAs."

However, the agency does expect you to keep surveying patients until you either run out of eligible patients or reach the completion goal, it says.

CMS also spells out that CAHPS vendors cannot also provide direct home health services to the patients of the agencies they are serving. CMS has approved 40 CAHPS vendors at this time.

Resource: More information about the CAHPS program, including the exemption application form, is at [www.homehealthcahps.org](http://www.homehealthcahps.org).