

ICH CAHPS Communication Guidelines

The In-Center Hemodialysis CAHPS (ICH CAHPS) Survey, like all patient surveying, is meant to provide unbiased feedback from your patients about the care they experienced. To help ensure that all ICH treatment facilities are being rated fairly based on the care they provide, CMS has created guidelines for communicating with hemodialysis patients both verbally and in written form about the survey.

The following communication guidelines are included in the ICH CAHPS Survey Administration and Specifications Manual published by CMS.

Purpose of the ICH CAHPS Survey

CMS has been publicly reporting quality measures for kidney dialysis centers on Dialysis Facility Compare (DFC) on <https://www.medicare.gov/dialysisfacilitycompare/>. Patients with end-stage renal disease (ESRD) can compare the services and quality of care that dialysis facilities provide.

The ICH CAHPS Survey was developed for patients who receive ICH to assess their dialysis providers, including nephrologists and medical and nonmedical staff, and the quality of the dialysis care they receive in their facility. As part of the Quality Incentive Program beginning in 2012 all Medicare-certified ICH facilities were required to administer the ICH CAHPS Survey with a sample of their ICH patients using an independent third-party vendor. ICH facilities were not required to submit the data from the surveys conducted in 2012 and 2013 to CMS; however, in each year they were required to attest to CMS that they had conducted the survey.

Beginning in the fall of 2014, the ICH CAHPS survey results were submitted to CMS, taking place of the previous attestation requirement. In 2015 and all subsequent years, the ICH CAHPS survey was/is administered twice a year with the results being submitted to CMS. The national implementation of the ICH CAHPS Survey is designed to meet the following three broad goals:

- Produce comparable data from the patient's perspective that will allow objective and meaningful comparisons between ICH facilities on domains that are important to consumers.
- Create incentives for ICH facilities to improve their quality of care.
- Enhance public accountability in health care by increasing the transparency of the quality of care provided in return for public investment.

Use of the ICH CAHPS Survey with Other Surveys

Some ICH facilities, survey vendors, or their agents might wish to conduct other patient experience of care or satisfaction surveys to support internal quality improvement activities. A formal survey, regardless of the data collection mode employed, is one in which the primary goal is to ask standardized questions of a sample of the facility's patient population. Contacting patients to assess their care at any time or calling a patient to check on services received are both considered to be routine patient contacts, not surveys.

ICH facilities should not repeat the ICH CAHPS questions or include questions that are similar to those in the ICH CAHPS Survey questionnaire when conducting their own patient surveys. Other surveys can include questions that ask for more in-depth information about ICH CAHPS issues as long as the questions are different from those included in the ICH CAHPS Survey questionnaire.

Communicating with Patients about the ICH CAHPS Survey

Patients receiving ICH treatment are an especially vulnerable population, relying on an ICH facility and its staff for life-sustaining care. Some patients might be reluctant to participate in the ICH CAHPS Survey or provide feedback on the dialysis care they receive for fear of retribution by facility staff. Patients fearing retribution might not be able to switch to another facility if they are unhappy with the care they receive from their current facility because there is not another facility close to where they live, or one that has any openings in its schedule. Patients also might be reluctant to provide survey responses that accurately reflect their experience with the care provided by their ICH facility because they might perceive that government agencies are not responsive to patients' concerns.

Because of concerns that patients might have about participating in the ICH CAHPS Survey, both ICH facility staff and their ICH CAHPS Survey vendors must avoid influencing patients' decision to participate in the survey and their survey responses. Staff at a dialysis facility are not allowed to help patients complete the survey. If patients ask ICH facility personnel to help them complete the survey, facility staff should instruct them to ask a family member or friend for help. Additionally, if sample patients have any questions about the survey, facility staff should instruct them to call their ICH CAHPS Survey vendor's toll-free ICH CAHPS telephone number, which is included in the prenotification and mail survey cover letters.

Survey vendors and ICH facility staff may tell their patients that they could be asked to respond to a patient experience survey. However, ICH facility staff may not do any of the following:

- Ask patients any additional survey questions that are the same as or similar to those included in the ICH CAHPS Survey questionnaire 4 weeks prior to and during the data collection period for each semiannual survey;
 - This restriction doesn't apply to other CMS surveys. For example, HCAHPS surveys will still be administered if an ICH patient has an eligible hospital discharge and is randomly selected to receive the survey.
- Help the patient answer the survey questions, even if the patient asks for a facility staff member's help;
- Attempt to influence patients' answers to the ICH CAHPS Survey questions;
- Provide a copy of the ICH CAHPS Survey questionnaire or cover letters to their patients;
- Include words or phrases verbatim from the ICH CAHPS Survey questionnaire in their marketing or promotional materials;
- Tell the patients that the facility hopes or expects their patients will give them the best or highest rating or will respond in a certain way to survey questions;
- Offer incentives of any kind to patients for participating (or not) in the ICH CAHPS Survey;
- Use the ICH CAHPS Survey to identify or ask about other patients who might need hemodialysis care;
- Include any messages or materials promoting the facility or the services it provides in survey materials, including mail survey cover letters, questionnaires, and telephone interview scripts; and
- Ask their patients if they would like to be included in the survey.