Mark B. McClellan, M.D., Ph.D.
Administrator
Centers for Medicare & Medicaid Services
200 Independence Avenue, S.W.
Room 445-G
Washington, DC 20201

Dear Dr. McClellan:

As partners in the Hospital Quality Alliance with the Centers for Medicare & Medicaid Services (CMS) and the Agency for Healthcare Research and Quality (AHRQ), we strongly support HCAHPS®, the patient experience of care survey. We stand ready to implement HCAHPS as part of our shared goal of making information about hospital quality available to the public on the Hospital Compare Web site.

Research has demonstrated that the information to be collected by HCAHPS is precisely the kind of information consumers value. By including the results of the HCAHPS survey on Hospital Compare, we will greatly enrich consumers’ understanding of the ways in which their local hospitals excel. The variety of data available will enable consumers to decide for themselves which aspects of care are most important to them, and use that information to make decisions about their care.

Hospitals and health care practitioners have long known the value of understanding patients’ perceptions of care. Nearly three-quarters of hospitals routinely collect such information to improve care in their facilities. Apart from a small number of state efforts, the information is not collected in a uniform manner, and therefore, it is not appropriate to share with the public. HCAHPS will allow hospitals to collect relevant, comparable data that is useful for consumers.

The HCAHPS survey instrument was developed using a scientifically sound process and has undergone substantial scrutiny over the past three years. Most recently, it was reviewed as part of the National Quality Forum’s (NQF) consensus development process.
The 27-item questionnaire was overwhelmingly endorsed by the NQF, whose more than 280 voting members are organizations representing consumers, purchasers, providers, and researchers. The NQF-endorsed 27-item HCAHPS survey is a national voluntary consensus standard, the only such patient survey to be so designated. The National Technology Transfer and Advancement Act of 1995 directs federal agencies to use industry consensus standards where available. Since CMS and AHRQ are part of the Hospital Quality Alliance, the implementation of anything other than the 27-item HCAHPS survey would require substantive justification.

The Abt study, which your agency commissioned to better understand the cost of implementing HCAHPS, reinforces the high value that consumers will place on HCAHPS. It also reveals that HCAHPS can be implemented by most hospitals at a cost of less than $1,000, far less than some had estimated.

While cost does not appear to be a deterrent to hospital participation in HCAHPS, the Abt study does raise other implementation issues. For example, the study notes that when hospitals add HCAHPS to their current survey, there may be problems comparing the new results to past trends. This trending is important to hospitals, and we appreciate the willingness of the AHRQ research team to help organizations preserve continuity. The researchers’ experience in dealing with similar trending issues on other surveys will be extremely helpful in smoothing the transition to HCAHPS.

The Hospital Quality Alliance is charting future quality measure implementation strategies – both short- and long-term – that will educate and empower consumers. Informed consumers, working with their clinicians, can be a major force in improving health quality and costs, and HCAHPS is crucial to achieving that goal. It is a quantum leap toward consumer-directed health care decision-making.

We appreciate the opportunity to work with you in encouraging the broad adoption of HCAHPS as a standardized hospital quality measure.

Sincerely,

American Hospital Association
AARP
AFL-CIO
American Medical Association
American Nurses Association
Association of American Medical Colleges
Consumer – Purchaser Disclosure Project
Federation of American Hospitals
Joint Commission on Accreditation of Healthcare Organizations
National Quality Forum
Participating or Supporting Organizations

By January 1, 2007, Americans will be able to select hospitals, physicians, physician groups/delivery systems and treatments based on public reporting of nationally standardized measures for clinical quality, consumer experience, equity, and efficiency.

3M Corporation
AARP
AFL-CIO
American Benefits Council
American Hospice Foundation
AT&T
Bank of America
The Business Roundtable
Buyers Health Care Action Group
California HealthCare Foundation
Carlson Companies, Inc.
Center for Health Care Strategies, Inc.
Center for the Study of Services/
Consumers' CHECKBOOK
Center for Medical Consumers
Consumer Coalition for Quality Health Care
E.I. duPont de Nemours & Co., Inc.
Eli Lilly and Company
Employer Health Care Alliance
Cooperative
ERISA Industry Committee
Ford Motor Company
General Motors Corporation
IBM
International Association of Machinists and Aerospace Workers
Kodak
The Leapfrog Group
Maine Health Management Coalition
The Manufacturing Institute
March of Dimes
Massachusetts Healthcare Purchaser Group
Maternity Center Association
Midwest Business Group on Health
Motorola, Inc.
National Association of Manufacturers
National Breast Cancer Coalition
National Business Coalition on Health
National Business Group on Health
National Citizen’s Coalition for Nursing Home Reform
National Coalition for Cancer Survivorship
National Coalition for Cancer Survivorship
National Partnership for Women & Families
National Small Business Association
Niagara Health Quality Coalition
Pacific Business Group on Health
The Robert Wood Johnson Foundation
Society for Human Resource Management
South Central Michigan Health Alliance
Sysco
U.S. Chamber of Commerce
Union Pacific Railroad
United States Office of Personnel Management
Verizon Communications
Xerox