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SUPPORTING STATEMENT- PART B

CoreQ: Short Stay Discharge (CoreQ: SS DC) Survey
For the collection of data related to the Skilled Nursing
Facility (SNF) Quality Reporting Program (QRP)
OMB 0938-TBD (CMS-10852)

B. Collection of Information Employing Statistical Methods

1. Respondent Universe

CMS has proposed adoption of the CoreQ® Short Stay Discharge (CoreQ: SS DC) Measure Survey for the FY 2026 SNF QRP. Medicare-certified Skilled Nursing Facilities (SNFs) and Non-Critical Access Hospitals (CAHs) with swing beds providing SNF services would be required to participate in the survey beginning with calendar year (CY 2024) to receive their full Annual Payment Update (APU).

We proposed two exceptions to this requirement.

1. Low Volume Exemption: SNFs with fewer than 60 discharged short stay residents during the prior calendar year would be exempt from the current year CoreQ: SS DC Survey data collection and reporting requirements for payment determination.
2. Newness Exemption: A SNF that received its CMS Certification Number (CCN, formerly known as the Medicare Provider ID Number) in a given calendar year would be exempt from conducting the CoreQ: SS DC Survey. For example, any SNF that received its CCN during calendar year 2024 would be exempt from conducting the survey in 2024, impacting the 2026 payment year.

Among SNFs that are not exempt, those with 60 or more short stay resident discharges in the prior year would be required to participate. Beginning January 1, 2024, SNFs would submit data for the CoreQ: SS DC Survey. SNFs would contract with CMS-approved CoreQ survey vendors (hereafter referred to as vendors) to conduct the survey on their behalf.

After each quarter of survey data collection, vendors would submit the survey data collected using the data submission tool function on the CoreQ: SS DC Survey website (TBD). All data submitted would be reviewed, undergo validation checks, and scored by the CoreQ: SS DC Survey Coordination Team. Results would be compiled for each SNF.

Respondent Selection

The respondents would be short stay SNF residents discharged back to the community within 100 days of admission. Specifically, the proposed survey eligibility criteria are:

- residents who are at least 18 years of age by the end of the reporting week,
- residents whose SNF stay was paid by any payer, including self-pay,
- residents who stayed 100 days or less from the date of admission in a SNF, and
- residents who are discharged alive to the community, including discharged to home or to assisted living facilities.

The vendor would exclude any resident who meets one of the following criteria: discharged to a hospital, another SNF, nursing home, psychiatric facility, Inpatient Rehabilitation Facilities (IRF), intermediate care facility, or Long-Term Care Hospital (LTCH); discharged to hospice; discharge status unknown; have dementia impairing their ability to answer the questionnaire defined as having a Brief Interview for Mental Status (BIMS) score on the Minimum Data Set (MDS) as 7 or lower; have a legal court appointed guardian; left Against Medical Advice (AMA); died during their SNF stay; or, have a foreign address or (missing address and missing telephone number and missing email address).

Residents may voluntarily request that they not be contacted (those who sign “no publicity” requests while under the care of SNF or otherwise directly request not to be contacted), and therefore would be excluded. Additionally, state-regulated residents would be excluded.

The CoreQ: SS DC Survey development and data collection activities were primarily conducted using mail surveys. As such, the proposed CoreQ: SS DC Survey has only been tested as a mail survey. We estimate the CoreQ: SS DC Survey would undergo mode testing as a telephone survey in calendar year (CY) 2024. In the meantime, vendors would be permitted to offer telephone surveys as an option for their SNF clients. The results of the mode experiment would be used to create mode adjustment factors that could be applied to the publicly reported data.

Number of Entities

Using the most recent data from 7/1/2021 through 6/30/22 and excluding SNFs with fewer than 60 survey-eligible residents, CMS estimates there would be 12,163 SNFs eligible to participate and 1,330,284 potential CoreQ: SS DC Survey respondents in the first year of proposed adoption (CY2024). CMS estimates 12,163 participating SNFs and 2,558,238 potential respondents beginning with the FY 2027 (CY 2025) SNF QRP.

Table 1: Estimated Number of Short Stay Discharge Survey Respondents (CY 2024-25)

Entity	Universe (N)	Exclusions (N)	Total in Collection (N)
Skilled Nursing Facilities	15,435	3,272	12,163
CoreQ: SS DC Survey Respondents (CY 2024)	1,393,237	62,953	1,330,284
CoreQ: SS DC Survey Respondents (CY 2025)	2,679,302	121,064	2,558,238

Expected Response Rate

The expected response rate is 30 percent for the CoreQ: SS DC Survey. The American Health Care Association/National Center for Assisted Living (AHCA/NCAL) and Dr. Castle submitted the CoreQ: SS DC measure for endorsement by the National Quality Forum (NQF)

(NQF #2614).¹ Response rates for this were as high as 64 percent.² However, these response rates were with less rigorous implementation guidelines and with self-selected SNFs. Thus, we estimate an expected response rate of 30 percent for the CoreQ: SS DC Survey.

2. Data Collection Procedures

Statistical Methodology for Stratification and Sample Selection

No stratification would be used.

Since this is a survey of a census of short stay resident discharges, no sampling would be required.

Estimation Procedure

The CoreQ: SS DC survey has four satisfaction questions. Each question has a response scale of poor, average, good, very good, and excellent. The CoreQ: SS DC measure represents the percentage of individuals who responded to 3 or more questions. The measure ranges from 0 to 100 percent. If information from one question is missing, imputation would be used for this question. If there is missing information for two or more questions, the respondent's survey would be excluded. Imputation is the only estimation procedure used.

Degree of Accuracy Needed for the Purpose Described in the Justification

A SNF would need a minimum of 20 completed valid surveys from residents (e.g., the denominator must be > 20) to calculate the CoreQ: SS DC measure. A SNF would also need a minimum valid response rate of 30 percent or higher. The response rate would be calculated by counting the total number of completed surveys divided by the total number of surveys administered less the total number of ineligible surveys (Refer to **Chapter 8** in the Draft CoreQ: SS DC Protocols and Guidelines Manual). These metrics are used because in the development and testing of the CoreQ: SS DC measure, the scores were stable and consistent.³

Figure 1: Response Rate Calculation

$$\text{Response Rate} = \frac{\text{Total Number of Completed Surveys}}{\text{Total Number of Surveys Administered} - \text{Total Number of Ineligible Surveys}}$$

Where:

- Total Number of Completed Surveys are those with a disposition code of 110 or 120 (Refer to Table 2 for definitions).
- Total Number of Administered Surveys is the total number of respondents in the census frame who are sent a mail survey and have a disposition code of 110 through 350 (Refer to Table 2 for definitions).
- Total Number of Ineligible Surveys are those assigned disposition codes 210, 230, and 240. No other surveys are removed from the denominator (Refer to Table 2 for definitions).

¹ (NQF), N. Q. (2016). *Measure evaluation criteria and guidance for evaluating measures for endorsement*. Endorsed: NQF #2614. Washington DC: NQF.

² Castle, N. G. (2020). The CoreQ: Development and Testing of a Nursing Facility Resident Satisfaction Survey. *Journal of Applied Gerontology*, 1-9.

³ (NQF), N. Q. (2016). *Measure evaluation criteria and guidance for evaluating measures for endorsement*. Endorsed: NQF #2614. Washington DC: NQF.

Table 2: CoreQ: SS DC Survey Disposition Codes

Code	Description
110	Completed Mail Survey The respondent answered at least 3 out of 4 primary questions based on the specific completeness criteria. Assign this code for mail only cases
120	Completed Phone Interview The respondent answered at least 3 out of 4 primary questions based on the specific completeness criteria. Assign this code if the interview was completed by phone if the resident responded by phone.
210	Ineligible: Deceased Assign this code if the resident is reported as deceased during the survey period.
230	Ineligible: Language Barrier/No Intermediary Available Assign this code to residents who do not speak any of the CoreQ: SS DC Survey language(s) that the vendor is administering for that SNF. The language barrier code only applies to the resident and should not be assigned until a determination is made that the resident cannot speak the language(s) being administered and there is no intermediary available.
240	Ineligible: Physically Incapacitated/No Intermediary Available Assign this code if it is determined that the respondent is unable to complete the survey because they are physically unable and there is no intermediary available to help with the survey. This includes respondents who are visually impaired (for mail surveys) or hearing impaired (for telephone surveys).
330	Bad Address/Undeliverable Mail It should be assigned if it is determined that the respondent's address is bad (e.g., the survey is returned by the Post Office as undeliverable with no forwarding address).
340	Wrong, Disconnected, or No Telephone Number This code should be used in telephone administration. This code should be assigned if it is determined that the telephone number is bad (disconnected, no telephone number available, etc.).
350	No Response After Maximum Attempts This code should be assigned to completed surveys received after the data collection period for the reporting week ends (8 weeks after starting). <u>Mail Mode</u> <ul style="list-style-type: none"> This code should be assigned if the residents address is viable, but they do not respond to either the first or second questionnaire mailing during the data collection period. Assign this code only if work on the case has not resulted in a completed survey or other final disposition code. This code should be assigned if the initial questionnaire is returned blank and the second questionnaire is never returned. <u>Telephone Mode</u> <ul style="list-style-type: none"> This code should be assigned if it is determined that the telephone number is viable, but the required number of telephone attempts (5) did not result in a completed interview or other final disposition code.

Code	Description
410	Quarterly Maximum Reached Use this code only after a vendor has received 63 <i>completed</i> surveys for a SNF in a quarter.

Unusual problems requiring specialized sampling procedures.

No sampling would be required for the CoreQ: SS DC Survey.

Periodic (less frequent than annual) data collection cycles to reduce burden

There would be no periodic (less frequent than annual) data collection cycles to reduce burden because of the survey implementation requirements.

3. Methods to Maximize Response Rates and to Deal with Issues of Non-Response

Response Rates

The CoreQ: SS DC questionnaire was designed to be short and easily understood. A limited number of items decreases the costs of survey administration and has the additional benefit of improving response rates. In the testing and development of the CoreQ: SS DC Survey, most SNFs (>90 percent) achieved the completed response goal of 20 surveys and most (>90 percent) had response rates above 30 percent. The average facility response (n=285 SNFs) rate was 64 percent.⁴ By design, the CoreQ: SS DC Survey maximizes response rates.

Non-Response

By design, the CoreQ: SS DC Survey minimizes rates of non-response. This is because the four questions were designed to be easily understood. The burden of answering four questions is also low. In the testing and development of the CoreQ: SS DC Survey responses from 10,319 residents were examined. Two (or more) missing responses occurred in 347 cases. Thus, the degree of missing data for calculating the CoreQ scores was very small (~3.3 percent). One missing response occurred in 1,341 cases or 12.9 percent of respondents. Imputation is used in these cases. Possibly due to the low number of missing responses, imputing the average score, or imputing the lowest score had no influence on the overall facility CoreQ Measure scores.⁵

4. Any Tests of Procedures or Methods to be Undertaken

The CoreQ: SS DC Survey development and data collection activities were primarily tested using mail surveys. As such, the CoreQ: SS DC Survey has currently only been tested as a mail survey. We anticipate mode testing as a telephone survey for the proposed CoreQ: SS DC Survey in CY 2024.

The mode testing would compare the CoreQ: SS DC measures calculated from data collected using the telephone with data collected using the mail mode of administration. The goal of the mode test would be to determine if any differences in the scores exist based on the mode

⁴ Castle, N. G. (2020). The CoreQ: Development and Testing of a Nursing Facility Resident Satisfaction Survey. *Journal of Applied Gerontology*, 1-9.

⁵ Castle, N. G. (2020). The CoreQ: Development and Testing of a Nursing Facility Resident Satisfaction Survey. *Journal of Applied Gerontology*, 1-9.

of data collection. Information from both, SNFs and respondents, already submitting information as part of the national implementation of the CoreQ: SS DC Survey would be used in the mode test.

5. Name and Telephone Number of Individuals Consulted on Statistical Aspects of the Design and the Name of the Agency Unit, Contractor(s), Grantee(s), or Other Person(s) who will actually Collect and/or Analyze the Information for the Agency.

The American Health Care Association/National Center for Assisted Living [AHCA/NCAL] and Nick Castle, Ph.D. developed the CoreQ: SS DC Survey and the survey administration protocols. AHCA/NCAL and Dr. Castle continue to collect information to determine the ongoing viability of the measure and the elements and procedures that are used to calculate the measure. This additional data and information are used to maintain NQF endorsement. Dr. Castle was consulted by CMS for this initiative and will analyze the data received. Dr. Castle is available at 304-293-0927.

The survey and data collection procedures were modified for national implementation by the contractor, C&T. We anticipate C&T will examine data for the proposed CoreQ: SS DC Survey as a telephone survey in CY 2024. C&T would also continue to update the Draft CoreQ: SS DC Protocols and Guidelines Manual.

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