

Advocacy Urges CMS to Consider Paperwork Burden on Small Businesses While Implementing the Hospital Consumer Assessment of Health Plans Survey

On January 18, 2005, the Office of Advocacy (Advocacy) filed a comment letter with The Centers for Medicare and Medicaid Services (CMS), concerning a notice of proposed collection of information (notice) seeking public comment on the Hospital Consumer Assessment of Health Plans Survey (HCAHPS). A complete copy of Advocacy's comment letter may be accessed at <http://www.sba.gov/advo/laws/comments>.

- On November 19, 2004, CMS published in the *Federal Register* a summary of proposed collections for public comment pursuant to section 3506 (c)(2)(A) of the Paperwork Reduction Act of 1995.
- In the notice, CMS seeks comment on the national implementation and utilization of the HCAHPS. CMS is proposing that the nation's hospitals obtain information from their patients using 25 specified survey questions that will help hospitals improve in areas that are important to consumers.
- In its comment letter, Advocacy was concerned that the HCAHPS will place a significant economic and paperwork burden on hospitals, many of which are considered small businesses pursuant to the United States Small Business Administration's size standards.
- Advocacy encouraged CMS to consider adopting a less burdensome regulatory alternative by lowering the patient survey from 25 questions to 10 or less, and considering whether existing hospital survey instruments meet HCAHPS goals. Such action would enhance the accuracy of data obtained, encourage hospitals with existing surveys to incorporate the CMS questions, encourage non-surveying hospitals to initiate patient satisfaction surveys, and not impose significant new costs on the industry.

For more information, visit Advocacy's web page at www.sba.gov/advo or contact Linwood Rayford at (202) 205-6533.