



December 2, 2005

OMB Human Resources and Housing Branch
Attention: CMS Desk Officer
New Executive Office Building
Room 10235
Washington, DC 20503

Dear Sir or Madam:

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 voluntary patient experience of care survey. We stand ready to offer HCAHPS information from hospitals that want to participate 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 our Hospital Compare Web site, 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 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 under the National Quality Forum's (NQF) Consensus Development Process. The 27-item questionnaire was overwhelmingly endorsed by the NQF, whose approximately 300 voting members represent 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.

CMS recently commissioned Abt Associates, Inc. to study the cost of implementing HCAHPS. The study reveals that HCAHPS can be implemented by most hospitals at a cost of less than \$1,000, far less than some had estimated. It also reinforces the high value that consumers will place on 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 urge you to quickly approve the use of HCAHPS, and help us make consistent and useful quality data available to the American public.

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
U.S. Chamber of Commerce