

September 6, 2018

Re: PXPF Policy Update - CMS request for comments related to pain measurement

Greetings to all PXPF Members,

Over the last year, PXPF has been engaged in an advocacy effort with CMS (the federal government Center for Medicare and Medicaid Services) around how patient experience is measured and used in reporting. At the heart of our discussions has been the HCAHPS (Hospital Consumer Assessment of Healthcare Providers and Services) survey. The HCAHPS survey is used in nearly every hospital in the United States to collect feedback from patients about their care. The results of the survey are reported to the government (CMS) and are shared with the public on the Hospital Compare website to help them make choices about their care. HCAHPS results also impact hospital reimbursement. PXPF members have been talking with CMS leadership about how this survey can be made better.

The HCAHPS survey has a number of domains that measure various aspects of care – communication from doctors and nurses, cleanliness, education about medications, preparation for discharge, call bell responsiveness and also pain management. All hospitals use the same questions about these domains. In recent years, the pain management domain has been the subject of controversy. Many providers feel the survey puts pressure on them to prescribe pain management medications that may not be appropriate. The ongoing Opioid crisis has only fueled the controversy.

We have an opportunity to comment on some proposed changes to the HCAHPS Pain Domain. A document is attached – prepared by our PXPF Workgroup on Measurement - that walks through the background on this issue and how you or your organization can offer comments. At our recent meeting with CMS this spring, one of the things they suggested the PXPF can do is to promote the process to give comments to CMS. This email is one way we can do that.

HCAHPS is the most prominent patient experience survey in our nation right now. How this survey is structured has a very profound impact on how hospitals and health providers understand the patient experience and also what they focus on in making it better. Thank you for considering offering comments as the structure of this survey is decided by the federal government. Please note that comments are due to CMS by 5pm EST September 27th.

Sincerely,

Esther Burlingame Helen Ying Co-Chairs – PXPF Measurement Workgroup

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