



December 29, 2024

Partnership for Quality Measurement  
PQMSupport@battelle.org

**Re: MUC2024-060 Revisions to the In-Center Hemodialysis Consumer Assessment of Healthcare Providers and Systems (ICH CAHPS) Survey**

Fresenius Medical Care (FME) appreciates the opportunity to comment on proposed revisions to the ICH CAHPS survey that are part of the 2024 List of Measures Under Consideration (MUC). We appreciate the opportunity to participate in the Pre-Rulemaking Measure Review (PRMR) process, which provides the Centers for Medicare and Medicaid Services (CMS) with an opportunity to hear from interested parties early in CMS's consideration of measures for inclusion into CMS quality reporting and value-based programs. FME is the largest integrated supplier in the country of services and products for individuals undergoing dialysis. We provide dialysis services to over 206,000 people with kidney failure in the United States. As discussed below, we support the proposed revisions to the ICH CAHPS Survey on the 2024 MUC and encourage CMS to adopt the shortened survey.

Specifically, CMS proposes to:

1. Remove all 7 questions that make up the Nephrologist Communication and Caring (NCC) multi-item measure and the nephrologist rating question;
2. Remove all 4 questions which are unnecessary for the psychometric functioning of the Quality of Dialysis Center Care and Operations (QDCCO) multi-item measure;
3. Remove 2 core ICH CAHPS questions that are not included in any multi-item measures (stand-alone questions); and
4. Remove 9 questions in the About You and proxy sections.

In total CMS is proposing to remove 23 questions from the mail ICH CAHPS Survey (22 in telephone script). CMS notes removal of the questions in the NCC measure is based on feedback from stakeholders that patients may not always be able to differentiate a kidney doctor from other dialysis center staff when answering the questions, and that facilities do not have the ability to hold kidney doctors accountable for low NCC measure scores.

FME supports the proposed revisions to the ICH CAHPS Survey. We have long highlighted the survey burden for patients who are already dealing with chronic illness. We have advocated for a shortened and simplified version of the Survey. The Survey has continued to struggle with a low and tapering response rate. Low response rates lead to unintended results in the ESRD QIP because the weight from the Patient and Family Engagement Domain is redistributed to other QIP measures when a facility has a low ICH CAHPS response rate. We believe that a shortened and simplified Survey will help address these ongoing challenges and reduce burden on patients. We also agree with CMS that removal of the NCC section is appropriate because it holds facilities accountable for factors beyond their control.

Fresenius Medical Care

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**Recommendation:** We recommend the PRMR adopt the revised ICH CAHPS measure.

We appreciate the opportunity to comment. Please feel free to reach out to me if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Cameron Lynch". The signature is written in a cursive, flowing style.

C.M. Cameron Lynch, SVP Government Affairs