



The ERISA Industry Committee

Representing the Employee Benefits Interests of America's Largest Employers

1400 L Street N.W., Suite 350, Washington, D.C. 20005

phone 202-789-1400 / fax 202-789-1120 / e-mail eric@eric.org

February 19, 2004

The Honorable Tommy G. Thompson, Secretary
U.S. Department of Health and Human Services
200 Independence Avenue, S.W.
Washington, D.C. 20201

RE: Need for Timely Adoption of the Full Standardized Hospital Patient Experience Survey (HCAHPS)

Dear Secretary Thompson:

I am writing to support the Department of Health and Human Services' (HHS) development of a standardized survey and administration protocol for hospitals to collect data for publicly reporting patients' perspectives on the care they received. We are aware of the concerns raised by some parts of the hospital industry in response to commercial concerns from survey vendors that the survey should be dramatically shortened. ERIC urges you to resist recommendations to shorten the patient experience survey and remain committed to publicly reporting the results.

ERIC is a nonprofit association committed to the advancement of the employee retirement, health and other benefit plans of America's largest employers. ERIC's members provide comprehensive retirement, health care coverage, and other economic security benefits directly to some 25 million active and retired workers and their families. ERIC has a strong interest in proposals affecting its members' ability to deliver those benefits, their cost and effectiveness, and the role of those benefits in the American economy.

Over the last two years, the Centers for Medicare and Medicaid Services (CMS) and the Agency for Healthcare Research and Quality (AHRQ) have engaged in a rigorous process to develop a draft HCAHPS survey and administration protocol. CMS and AHRQ have engaged in a public process grounded in science and evidence-based practice. Once implemented, HCAHPS will generate comparative information for consumers who need to select a hospital while enhancing hospitals' accountability to the public they serve.

We strongly disagree with efforts to compromise the HCAHPS in order to protect the existing survey instruments of established vendors. Preserving the full panoply of HCAHPS questions will enhance, not undercut, hospitals use of comparative patient experience data for quality improvement. Moreover, CMS has made every effort to balance the need for accurate and comparable patient-experience data with

implementation concerns, permitting customization of the set of questions to meet organizational needs and quality improvement goals while allowing survey vendors to continue to offer their proprietary products and services.

Thank you for your continued efforts to develop a hospital patient experience survey that provides consumers and purchasers the information they need to make better-informed health care decisions.

Sincerely,

Mark J. Ugoretz
President, The ERISA Industry Committee

Cc: Carolyn Clancy, MD, Agency for Healthcare Research and Quality
Barbara Paul, MD, Centers for Medicare and Medicaid Services
Dennis Smith, Centers for Medicare and Medicaid Services