Acting Administrator Slavitt Page 2 of 2 August 4, 2016

without cost. To reduce administrative burdens borne by primary care practices as well as to provide Medicare beneficiaries ample time to complete the patient experience survey information, the AAFP strongly urges CMS to make all patient experience surveys available free online to patients and practices. This would promote and facilitate the survey's completion. Physicians should be able to direct their patients to the online survey and the patient could then complete the information. Afterwards the data could be accessed and used by public and private payers and reported to the physician as needed. Additionally the AAFP opposes the sole use of the Clinician and Group Surveys Consumer Assessment of Healthcare Providers and Systems (CG-CAHPS). Instead CMS should use patient experience measures used by the Core Quality Measures Collaborative.

Finally we are encouraged that on July 6, HHS <u>acknowledged</u> that many clinicians report feeling pressure to overprescribe opioids because scores on the Hospital Consumer Assessment of Healthcare Providers and Systems (HCAHPS) survey pain management questions are tied to Medicare payments to hospitals. To mitigate the perception that there is financial pressure to overprescribe opioids, we fully support the proposal to remove the HCAHPS survey pain management questions from the hospital payment scoring calculation. Thus hospitals would continue to use the questions to survey patients about their in-patient pain management experience, but these questions would not affect the level of payment hospitals receive. The AAFP believes this is laudable policy that should be extended to all patient experience measures.

The AAFP urges CMS to follow these recommendations. Should you have questions, please contact Tracey Allen-Ehrhart, Manager of the AAFP's Center for Quality, at 913-906-6000, ext. 4114 or tallen@aafp.org.

Sincerely,

Robert L. Wergin, MD, FAAFP

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Board Chair