Accountable Care Organization Realizing Equity, Access, and Community Health Consumer Assessment of Healthcare Providers and Systems (ACO REACH CAHPS) Performance Year 2024

Model Quality Assurance Plan Outline

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Survey vendors that meet the necessary business requirements to become a CMS-approved ACO Realizing Equity, Access, and Community Health (REACH) CAHPS survey vendor and have participated in the ACO REACH CAHPS Survey Vendor training session(s) will receive training approval as an ACO REACH CAHPS vendor. Survey vendors will receive authorization approval after they have submitted an acceptable Quality Assurance Plan (QAP). This model QAP serves as a guide for survey vendors as they develop their procedures and materials for implementing and complying with the ACO REACH CAHPS *Quality Assurance Guidelines for Survey Vendors*.

Each vendor must complete and submit a QAP to the ACO REACH CAHPS Survey Coordination Team. QAPs are submitted via the QAP Submission Module on the ACO REACH CAHPS website. Submit a Word version (not a .pdf or other format) of your QAP online at the "Submit Quality Assurance Plan" link located under the "Vendors" tab once you are logged into the private side of the website. Returning vendors should submit a tracked changes Word version that shows only the revisions made since the previously approved QAP, being sure to discuss changes in procedure made in response to CMS' comments in the PY 2023 site visits and other oversight activities. The initial QAP is due to the team within four weeks of completion of the ACO REACH CAHPS Survey Vendor Training(s). The ACO REACH CAHPS Survey Coordination Team will complete an initial review within two weeks after the QAP is submitted. If further clarification is needed, the Survey Coordination Team will work with the survey vendors to obtain the necessary information. This process may extend beyond the two-week period, especially if multiple iterations of revisions are required. After the review process has concluded, the vendor will be notified of QAP approval.

In addition, each vendor will be required to update and resubmit its QAP whenever it makes key personnel or protocol changes prior to January 13, 2025 (final data submission deadline).

The vendor's QAP should include the sections listed below. The specific requirements for these sections are described in the pages that follow.

A. Organization Background and Staff Experience
B. Work Plan
C. Survey Implementation Plan
D. Data Security, Confidentiality, and Privacy Plan
E. Questionnaire and Materials Attachments

We recommend including headings for each section for easy navigation of the QAP document. Returning vendors should be sure to include within the individual sections, any changes to survey implementation and processes for the current performance year (for example, highlighted in the Update Training session) as well as relevant site visit feedback they received in the previous performance year.

Each vendor will receive final approval as an ACO REACH CAHPS vendor after its initial QAP has been reviewed and approved by the ACO REACH CAHPS Survey Coordination Team. Vendors will receive approval of survey questionnaires and materials after the second QAPs has been reviewed and approved. All vendor questionnaire and materials templates must receive RTI approval before they can be used for data collection.

A. Organization Background and Staff Experience

1. Provide your organization's name and address. If your organization has multiple locations, include the address of both the main location and the address of the locations at which the primary operations, including data collection and data processing activities, are being conducted.

2. Describe your organization's history and affiliation (e.g., is it part of another company, or affiliated with a university, independent, etc.). Include the scope of business, number of years in business, and number of years of survey experience.

3. Include and complete Table 1 below that shows the names, titles, and reporting relationships of staff, including subcontractors, who are responsible for the listed tasks on ACO REACH CAHPS.

Table 1. ACO REACH CAHPS Project Organization

ACO REACH CAHPS Tasks	Name of staff filling this position, and their organization	Supervised by:	Name of person responsible for quality assurance of this task
Overall project management including tracking and supervision of all tasks below (*)			
Obtaining the sample file			
Overseeing implementation of mail survey (*)			
Overseeing implementation of telephone survey (*)			
Overseeing data receipt and data entry/scanning			
Conduct file development and submission (*)			

* = The staff member filling this position is considered <u>key staff</u> and is the person listed in the Vendor Application.

4. Summarize the background and experience of each individual responsible for the tasks listed in Item 3 above. The narrative of each individual's experience must include a discussion of how the person's qualifications are relevant to the ACO REACH CAHPS tasks that he or she is expected to perform. Resumes must be available upon request.

5. Business interruptions (such as the COVID-19 pandemic) can lead to shortages of staff, materials and other resources. Describe your business continuity plan, including how you forecast needs and ensure adequate <u>staffing</u>, <u>materials</u> and <u>resources</u> for surveys. Include your subcontractors' business continuity plans as well. Please note this differs from your disaster recovery plan (section D, item #7 below) which addresses recovery of <u>data</u> for your organization in the event of a disaster.

B. ACO REACH CAHPS Work Plan

1. Include a copy of your schedule or timeline for preparing and concluding all activities within ACO REACH CAHPS *Quality Assurance Guidelines*. The timeline should align with the key dates and deadlines on the home page of the ACO REACH CAHPS website. Each process step must include quality control processes. The timeline should include but is not limited the following steps:
   a. preparation of mailing templates,
   b. programming of the telephone instrument,
   c. receipt of sample files from the ACO REACH CAHPS web portal/Survey Coordination Team
   d. obtaining updated address and phone numbers and standardizing addresses
   e. printing of the mail materials to sampled cases,
   f. training staff,
   g. mailing,
   h. each step of the data collection,
   i. data file cleaning, and
   j. data file preparation, review, interim submission and final submission.

C. ACO REACH CAHPS Survey Implementation Plan

For the ACO REACH CAHPS protocol, please describe:

1. Process for Receipt and Tracking Sample Files
   a. Describe your process.
   b. Describe how updates to patient contact information from commercial databases and files supplied by ACOs are obtained and reflected in the contacting file.
   c. Include the name of the staff member responsible for the process.

2. Training for all Project Staff
   a. Project staff includes:
      i) Telephone interviewers
      ii) mail survey production staff
      iii) data receipt, data processing, and data entry staff,
      iv) customer support/Help Desk staff
      v) all staff in supervisory positions
   b. Include an explanation of how attendance will be ensured and tracked
   c. Describe training related quality control procedures
   d. Include the name(s) of the staff member(s) responsible for training project staff

3. Help Desk processes for implementation and quality control on ACO REACH CAHPS
   a. Include, at a minimum, the actual telephone number (when available), email address (when available), and who responds to questions
   b. Include information on the days of the week and times of the day that you will staff the customer support line, including Spanish language inquiries. Describe how you will handle after-hours contacts. Present the text of any audio-recordings (voicemail greetings) and auto replies that will be used
   c. Include information on how status codes will be assigned by customer support staff

    d. Include a discussion of your quality control procedures to ensure compliance with ACO REACH CAHPS protocols and describe your documentation of this quality control

    e. Include the name of the staff member responsible for the Help Desk process

4. Printing and production processes for ACO REACH CAHPS mail surveys

    a. Explain the quality control checks implemented at each stage (e.g., monitoring the quality and content of English and Spanish mail survey packages, ensuring that the correct questionnaire (Standards/New Entrants or High Needs) is inserted in the appropriate mail packages, use of seeded mailings, and frequency of checks)

    b. Include the name of the staff member responsible for the process

5. Receipt and data entry or scanning process for ACO REACH CAHPS mail surveys

    a. Quality control checks being implemented at the stages of questionnaire receipt, status code assignment, data entry, and scanning, and how frequently those checks are conducted

    b. Include the name of the staff member responsible for the process

6. Process for implementing the telephone survey

    a. Describe system and procedures that will ensure all interviewing is conducted according to the ACO REACH CAHPS protocols (e.g., varying times of day calls are attempted, tracking the status of call attempts, CATI time zones)

    b. Describe process to determine the number of bilingual English/Spanish interviewers to staff and the hours they will work, to ensure sufficient staff to complete Spanish language interviews

    c. Include a crosswalk of internal interim status codes and ACO REACH CAHPS final status codes

    d. Describe process for preventing calls from being flagged as spam and coding residential care facility sample members. Include plans for caller ID on outgoing CATI calls and describe the process for inbound calls to caller ID number.

    e. Describe how you will ensure the correct CATI script (Standards/New Entrants or High Needs) is used in the appropriate interviews.

    f. Describe how monitoring is conducted and documented

    g. Include the name of the staff member responsible for managing and monitoring interviewer performance

7. Control system to monitor case status as cases transition from mail survey phase to telephone follow-up phase

    a. Describe survey receipt process to track surveys that are returned while telephone follow-up phase is in effect

    b. Describe the processes that you have in place to ensure that sample members who have returned a completed survey are not called after the completed survey is received.

    c. How do you determine which completed survey to retain (mail or telephone interview data) if the sample member returns a completed survey and participates in a telephone interview?

8. Processes to submit data files to the ACO REACH CAHPS web portal for both interim and final file submissions

a. Discuss quality control during file creation, including document of quality control
b. Process that will be used to ensure final survey data are linked to the original SID assigned by the ACO REACH CAHPS Survey Coordination Team
c. Include the name of the staff member responsible for the deliverables

D. Data Security, Confidentiality, and Privacy Plan

1. Describe your processes for obtaining or updating a Business Associate Agreement with REACH ACOs. Include process for signing a Data Use Agreement with CMS annually.

2. Data Security for Receiving and Tracking Sample Files.
   a. Section C1 requested a description of the process for receiving and tracking sample files. Here, please describe in detail how data security is provided in this process, including explaining your use of unique user accounts that are not shared, file encryption, backup systems, etc. If any activities will be taking place at a remote work location, describe how data security is provided at remote locations and in file transmissions between locations.

3. Data Security for Data in Hardcopy in Mail and Hardcopy Form.
   a. Section C4 requested a description of the process for implementing data collection by mail and telephone. Here, please describe in detail how data security is provided for data in hardcopy and electronic form. Explain your use of unique user accounts that are not shared, file encryption, backup systems, material storage, access control, retention, and when materials will be destroyed, in addition to other measures taken. If any activities will be taking place in a remote work location, address how data security is provided for those remote locations.

4. Data Confidentiality Among Staff.
   a. Describe your vendor and subcontractor staff confidentiality agreements, including how affidavits of confidentiality are being stored and tracked. Include a copy of the confidentiality agreement that is being used.

5. Privacy Plan.
   a. Describe your measures to protect respondent privacy. Include your telephone survey script regarding privacy or confidentiality of the data collected. Vendors must ensure compliance with Health Insurance Portability and Accountability Act (HIPAA) requirements. Describe the required HIPAA training of staff working on the ACO REACH CAHPS project. If you are using any subcontractors for any roles, describe how the subcontractor's staff are being trained on HIPAA.

6. Data Confidentiality for Patients.
   a. For the telephone survey, include a screenshot or text indicating the voluntary nature of the sample member's participation.

7. Data Security for Disaster Recovery.
   a. Please include a statement in your QAP confirming that you have a disaster recovery plan for ACO REACH CAHPS data. The statement should address recovery of data in both your commercial workspace and any remote locations used. Include confirmation of your subcontractors' disaster recovery plans as well. Please note this differs from your

business continuity plan (section A, item #5 above) which addresses coverage of staff, materials, and other resources in the event of a business interruption.

E. Programmed CATI Screens, and Formatted Mail Survey and Materials Attachments for Second QAP Submission

1. Attach a copy of your formatted mail survey questionnaire, both English and Spanish versions for both Standard/New Entrants and High Needs, if you will be contracting with High Needs REACH ACOs. Be sure to include the cover page and back page. Please include dummy sample data and make sure you do <u>not</u> provide survey(s) with a real beneficiary's name.

2. Attach all screenshots from your telephone interview program—beginning with the introductory screens and ending with the last question in the interview—both English and Spanish versions for both Standards/New Entrants and High Needs if you will be contracting with High Needs ACOs. Please include dummy sample data and make sure you do <u>not</u> provide script(s) with a real beneficiary's name.

    a. You may submit a secure link and credentials for the ACO REACH CAHPS Survey Coordination Team to test the CATI program in lieu of submitting screenshots.

    b. For returning vendors: Returning vendors may submit a reduced set of screenshots or CATI programming that reflects only changes made since the previous performance year. If there are no changes to your CATI systems and programming since the previous performance year, returning vendors may confirm they made no changes.

3. Include a copy of your cover letters, postcards, and envelopes. Please include dummy sample data and do <u>not</u> include real beneficiary's names.

4. Include a clean copy of your approved Quality Assurance Plan. All tracked changes from the initial QAP submission should be accepted. Only revisions made since the previously approved QAP should be tracked.

Note: Your formatted and programmed materials must be submitted in your second QAP no later than August 2, 2024.