

# Medicare Advantage and Prescription Drug Plan (MA & PDP) CAHPS® Survey

## 2024 Minimum Business Requirements

A survey vendor and/or its subcontractor(s) must meet **all** of the Survey Vendor Minimum Business Requirements listed below in order to apply to administer the Medicare Advantage and Prescription Drug Plan (MA & PDP) CAHPS® Survey<sup>1</sup>. Organizations that are approved to administer the MA & PDP CAHPS Survey must conduct all of their business operations within the United States so the MA & PDP CAHPS Survey Project Team can perform the required oversight activities.

Any organization that performs key survey administration functions on behalf of an MA & PDP CAHPS Survey vendor that requires receipt of an electronic file containing enrollee-level personally identifiable information (PII) shall be referred to hereafter as a “subcontractor.”

### 1. Relevant Survey Experience

Demonstrated recent experience in fielding Web-Mail-Phone Mode surveys.

Criteria	Survey Vendor
Survey Experience	<ul style="list-style-type: none"> <li>• Survey vendor and/or its subcontractor(s) must have prior experience (minimum of 3 years) conducting surveys with the Medicare population</li> <li>• Survey vendor and/or its subcontractor(s) must have prior experience (minimum of 3 years) administering CAHPS surveys within the most recent 5-year time period</li> <li>• Survey vendor and/or its subcontractor(s) must have prior experience (minimum of 3 years) conducting large-scale surveys that include mail survey administration followed by survey administration via computer assisted telephone interview (CATI) follow-up of non-respondents within the most recent 2-year time period</li> <li>• Survey vendor and/or its subcontractor(s) must have prior experience (minimum of 2 years) conducting surveys via web-mode administration. Web-mode experience must include experience conducting surveys that include web-mode plus follow up of non-respondents via mail or phone. Web-mode experience must be within the most recent 2-year time period.</li> <li>• If applicable, poor past performance by survey vendor and/or its subcontractor(s) on CMS surveys of people with Medicare will be considered as vendor failing to meet minimum business requirements. For example:               <ul style="list-style-type: none"> <li>○ Not adhering to the timeline and/or procedures for survey administration</li> <li>○ Not adhering to required oversight activities</li> <li>○ Not adhering to Event Report procedures and corrective actions</li> </ul> </li> </ul>
Number of Years in Business	<ul style="list-style-type: none"> <li>• Survey vendor must have minimum of 4 years in business<sup>2</sup></li> </ul>

Criteria	Survey Vendor
Experience with Multiple Survey Languages	<ul style="list-style-type: none"> <li>• Survey vendor and/or its subcontractor(s) must have prior experience conducting surveys in both English and Spanish. A survey vendor will have the option of electing to conduct the MA &amp; PDP CAHPS Survey in Chinese, Vietnamese, Korean, and/or Tagalog.</li> </ul>

## 2. Organizational Survey Capacity

Capability and capacity to program web surveys and collect data submitted online, handle required volume of mail questionnaires, and conduct standardized telephone interviewing in a specified time frame.

Criteria	Survey Vendor
Personnel	<ul style="list-style-type: none"> <li>• Designated Personnel: <ul style="list-style-type: none"> <li>○ Project Manager with a minimum of 3 years relevant Mixed Mode (mail survey administration followed by CATI administration with non-respondents) survey experience</li> <li>○ Subject Matter Expert (SME) in web survey administration with a minimum of 2 years previous experience as project manager for web surveys that include follow-up of non-respondents via mail or phone</li> <li>○ Mail Survey Supervisor with a minimum of 1 year previous experience in role</li> <li>○ Telephone Survey Supervisor with a minimum of 1 year previous survey call center experience</li> <li>○ Web Programmer with a minimum of 1 year previous experience programming, testing, and collecting data via web survey instruments</li> <li>○ Lead or Primary Programmer with a minimum of 1 year previous experience processing survey data and preparing data files for electronic submission</li> </ul> </li> </ul>
System Resources	<ul style="list-style-type: none"> <li>• System resources must meet CMS specifications in the QAP&amp;TS and at a minimum include the following: <ul style="list-style-type: none"> <li>○ Physical facilities and electronic equipment and software for secure data collection processing and reporting</li> <li>○ Computer programs for implementing web survey instruments that are accessible in mobile and computer versions that are 508 compliant; present similarly on different browser applications, browser sizes, and platforms (mobile, tablet, computer); and present similar to mail survey and mirror the design principles of the mail survey (open space between question text and response options, vertical presentation of response options, use of underlining, font styles, etc.)</li> <li>○ Creation and submission of data files containing enrollee-level information</li> <li>○ Electronic survey management system that tracks fielded surveys through the entire protocol, removes records with completed surveys</li> </ul> </li> </ul>

Criteria	Survey Vendor
	<p>from further outreach in a timely manner across all modes of administration, and protects the confidentiality of personally identifiable information and survey data received from enrollees (e.g., password protections, firewalls, data encryption software, personnel access limitation procedures, and protection from all forms of malware including virus and spyware protection)</p> <ul style="list-style-type: none"> <li>○ A secure commercial work environment for receiving, processing, and storing hardcopy questionnaires and hardcopy sample files that protects the confidentiality of enrollee response data and personally identifiable information</li> <li>○ Anticipate and plan for site visits</li> </ul>
Approved Use of Subcontractors	<ul style="list-style-type: none"> <li>• Subcontractors must meet the criteria outlined for the survey administration activities the subcontractors will be performing</li> <li>• Subcontractors will be assessed at the time of application and must be approved by CMS</li> <li>• Subcontractors may be added after the application period closes only with prior review and approval by CMS</li> </ul>

Criteria	Survey Vendor
Web-Mail-Phone Mode Administration	<ul style="list-style-type: none"> <li>• Responsible for reproduction, printing, and mailing of survey materials in accordance with specifications provided</li> <li>• Ability to administer web surveys in accordance with specifications provided, including but not limited to: <ul style="list-style-type: none"> <li>○ Capacity to disseminate survey invitation emails that include the CMS logo (and optional plan logo), and mirror the language of the mail survey letters and adhere to templates provided by CMS</li> <li>○ Capacity to disseminate survey invitation emails that include an embedded hyperlink that the enrollee can click on to directly connect to the web survey without entering a PIN or other enrollee-specific code</li> <li>○ Capacity to produce hard copy letter invitations for the web survey that include a URL of no more than 25 characters and a unique PIN for the enrollee to enter</li> </ul> </li> <li>• Secure file transfer protocol or systems to receive enrollee email address data from contract clients</li> <li>• Capacity to clean client-provided email addresses to remove emails that do not conform to standard format of text@suffix, and/or client-provided email addresses that do not include known suffixes</li> <li>• Capacity for conducting telephone interviews using a CATI system</li> <li>• Follow MA &amp; PDP CAHPS Survey timeline</li> <li>• Use commercial software/resources to ensure that mailing addresses and telephone numbers are accurate and correct for all sample members</li> <li>• If a survey vendor intends to administer the MA &amp; PDP CAHPS Survey in Chinese, Vietnamese, Korean, and/or Tagalog, web, mail, and telephone modes must be administered in these languages</li> <li>• Survey vendor must have the capacity to maintain an interviewer pool that meets the needs of enrollees in all languages in which the survey is administered</li> <li>• Survey vendor must have the capacity to conduct accurate monitoring of interviewers in all languages in which the survey is administered</li> <li>• Web survey administration, mail survey administration, and telephone interviews are not to be conducted from a residence, nor from a virtual office unless the survey vendor has received approval from CMS<sup>1</sup></li> <li>• Survey vendors will be required to attest that procedures used to dial cell phones adhere to the vendor’s legal or compliance department requirements for adherence to the Telephone Consumer Protection Act of 1991, known as TCPA</li> </ul>

Criteria	Survey Vendor
Data Submission	<ul style="list-style-type: none"> <li>• Register for access to the MA &amp; PDP CAHPS Data Warehouse and follow data specifications and procedures in order to submit and receive encrypted data via the Internet</li> <li>• Subcontractors will not be given access to the MA &amp; PDP CAHPS Data Warehouse and may not submit data</li> <li>• Execute business associate agreement with health or drug plans and receive annual authorization from health or drug plans to collect data on their behalf and submit to CMS</li> </ul>
Data Security and Confidentiality	<ul style="list-style-type: none"> <li>• Web surveys must be administered with a secure user PIN that is unique to each sampled enrollee, the data transmitted over a secure connection over HTTPS using transport layer security (TLS), and respondent information must be securely stored</li> <li>• Returned paper questionnaires must be stored in a secure and environmentally safe location</li> <li>• Access to electronic files must be limited to necessary personnel. Firewalls and/or physical barriers must be implemented to protect against unauthorized access to electronic files.</li> <li>• Electronic security via implementation of access levels and passwords must be instituted</li> <li>• Daily data back-up procedures that adequately safeguard system data must be implemented; procedures must include backup recovery testing to verify files can be retrieved</li> <li>• Develop a disaster recovery plan to support continued business operations or recovery in the event of a natural or human-related disaster</li> <li>• Required encryption protocols must be utilized for transmitting data files. Encryption protocols must include a Federal Information Process Standard (FIPS) 140-2 compliant algorithm. CMS-defined personally identifiable information (PII) must be transmitted securely (e.g., encrypted file via email, data portal, or SFTP with file-level encryption).</li> <li>• Develop procedures for identifying and handling breaches of confidential data</li> <li>• Ensure Data Use Agreement (DUA) with CMS is kept up to date and that all DUA requirements are followed, including cell size suppression rules. The CMS DUA must be updated within 3 business days of any change to the contact information, individuals, or organizations in the DUA, including adding or removing a subcontractor</li> <li>• Develop and execute confidentiality agreements which include language related to HIPAA regulations and the protection of patient information, and obtain signatures from all personnel with access to survey information, including staff and all subcontractors involved in survey administration and data collection <ul style="list-style-type: none"> <li>○ Confidentiality agreements must be reviewed and re-signed periodically, at the discretion of the survey vendor, but not to exceed a 3-year period</li> </ul> </li> </ul>

Criteria	Survey Vendor
	<ul style="list-style-type: none"> <li>• Vendors and subcontractors (if applicable) must document compliance with HIPAA regulations with regard to enrollee protected health information (PHI) <ul style="list-style-type: none"> <li>○ Vendors must not share identifying information about enrollees in the survey sample with health or drug plans</li> </ul> </li> <li>• Vendors must receive approval from CMS to append any additional data to the sample file</li> <li>• Survey vendors may not provide health or drug plans with any information that may allow contract staff to identify sampled enrollees - either directly or by inference.</li> <li>• Survey vendors must not use any MA &amp; PDP CAHPS survey data, whether preliminary or final results, for any purpose beyond client reports for quality improvement purposes</li> </ul>
Data Retention	<ul style="list-style-type: none"> <li>• Retain all data files, data collected from web surveys, audio recordings, and paper copies or scanned images of surveys for a minimum of 3 years. The retention requirement also applies to sample information. Retention of data will require extension of the CMS Data Use Agreement (DUA). <ul style="list-style-type: none"> <li>○ Archived electronic data files, audio recordings, and paper copies or scanned images of surveys must be easily retrievable</li> </ul> </li> </ul>
Technical Assistance/ Customer Support	<ul style="list-style-type: none"> <li>• Establish a customer support email address to answer queries from enrollees. The customer support email address should have staff available during regular business hours (to be established from the time of the pre-notification letter) to respond to enrollee emails asking for technical assistance to access or complete the web survey.</li> <li>• Establish toll-free customer support telephone lines with live operator during regular business hours (to be established from the time of the pre-notification letter through the end of data collection)</li> <li>• Accommodate both Spanish and English inquiries that are submitted by phone and/or email</li> <li>• Accommodate Chinese, Vietnamese, Korean, and/or Tagalog inquiries if administering the MA &amp; PDP CAHPS Survey in these optional languages</li> <li>• Survey vendor must have the capacity to conduct accurate monitoring of the customer support line and customer support email inbox in all languages in which the survey is administered to ensure accurate responses are provided</li> </ul>

### 3. Quality Control Procedures

Personnel training and quality control mechanisms employed to collect valid, reliable survey data.

Criteria	Survey Vendor
Demonstrated Quality Control Procedures	<ul style="list-style-type: none"> <li>• Set-up, conduct, and document quality control procedures for all phases of survey implementation, including:               <ul style="list-style-type: none"> <li>○ Monitoring of subcontractor(s) if applicable</li> <li>○ Training</li> <li>○ Web administration of surveys via emailed and paper invitations in all languages in which survey is administered</li> <li>○ Printing, mailing, and recording receipt of surveys</li> <li>○ Telephone administration and monitoring of survey (electronic telephone interviewing system) in all languages in which the survey is administered</li> <li>○ Coding, editing, or keying in survey data</li> <li>○ Preparing enrollee data files for interim and final submission</li> <li>○ All other functions and processes that affect the administration of the MA &amp; PDP CAHPS Survey</li> </ul> </li> <li>• Develop and submit annual Quality Assurance Plan by specified due date</li> <li>• Submit an Event Report to CMS within 1 business day of becoming aware of an event in survey administration</li> </ul>
Training Requirements	<ul style="list-style-type: none"> <li>• Participate in and successfully complete MA &amp; PDP CAHPS training webinar(s) for vendors</li> <li>• Complete a training evaluation to assess comprehension of MA &amp; PDP CAHPS Survey protocols</li> <li>• Participate in any refresher training sessions or webinars</li> </ul>
Training Participants	<ul style="list-style-type: none"> <li>• Project staff fulfilling the following roles must attend training:               <ul style="list-style-type: none"> <li>○ Project Manager, SME in web survey administration, Mail Survey Supervisor, and Telephone Survey Supervisor at a minimum</li> <li>○ At least one representative from a subcontractor organization if that subcontractor will be conducting any of the functions below:                   <ul style="list-style-type: none"> <li>▪ Inserting or survey packet preparation</li> <li>▪ Processing of returned mail surveys</li> <li>▪ Conducting telephone interviews (CATI administration)</li> <li>▪ Conducting web surveys (programming and/or hosting)</li> </ul> </li> </ul> </li> <li>• Project staff member(s) are also recommended to attend training if they are responsible for the following functions:               <ul style="list-style-type: none"> <li>○ Decrypting the sample file and performing sample file quality checks</li> <li>○ Programming the CATI script</li> <li>○ Programming the web survey</li> <li>○ Preparing and submitting the survey data file</li> <li>○ Programming the sample management systems used to track and/or document survey operations for sampled enrollees during web, mail, and phone administration of the survey</li> </ul> </li> </ul>

Criteria	Survey Vendor
Oversight	<ul style="list-style-type: none"> <li>• Vendors and their subcontractors are subject to oversight activities, including in-person visits to business operation site(s) to observe MA &amp; PDP CAHPS web survey administration, mail production, CATI survey administration, and/or data preparation and submission</li> <li>• Survey vendor must be prepared to provide access to all aspects of MA &amp; PDP CAHPS survey administration for the site visit team</li> <li>• Submit web survey screenshots that display what the enrollee will see (using both mobile and computer platforms), mail materials, and CATI screenshots to the project team for review by specified due date</li> <li>• Submit web survey testing link to project team to test functionality of web survey by specified due date</li> <li>• Organization must be prepared to submit reports as requested by the project team, such as reports of outbound CATI progress, inbound mail processing, and web completion and removal from active sample</li> </ul>

#### 4. Approval Term

An approved survey vendor may administer the MA & PDP CAHPS Survey for the specified amount of time.

Criteria	Survey Vendor
Approval Term	<ul style="list-style-type: none"> <li>• Approval is for a fixed 1-year term</li> <li>• In determining vendor approval, CMS will consider past performance, as a survey vendor or subcontractor, in support of CMS activity. Performance criteria include, but are not limited to: <ul style="list-style-type: none"> <li>○ Occurrence of similar substantive errors within or across projects</li> <li>○ Significant non-compliant items identified during site visits or monitoring</li> <li>○ Receipt of a corrective action memo from CMS</li> <li>○ CMS requests for quality improvement plans</li> <li>○ Refusal to allow site visit team to observe MA &amp; PDP CAHPS production activities</li> </ul> </li> <li>• Approval as a survey vendor in prior years does not guarantee future approval</li> </ul>

<sup>1</sup> CMS is currently granting survey vendors exceptions on a case-by-case basis to MA & PDP CAHPS Survey on-site operating requirements during administration of MA & PDP CAHPS.

<sup>2</sup> Subcontractor experience cannot be used to fulfill the number of years in business requirement.