

Primary Care First: Patient Experience of Care Survey (PECS) Quality Assurance Guidelines for Survey Vendors

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Acronyms

Acronym Term

ACO Accountable Care Organization

ATA Applies to all

CAHPS Consumer Assessment of Healthcare Providers and Systems

CATI Computer Assisted Telephone Interviewing

CMS Centers for Medicare and Medicaid Services

DUA Data Use Agreement

PECS Patient Experience of Care Survey

PHI Protected health information

PII Personally identifiable information

QAP Quality Assurance Plan

SID Sample Identification Number

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# Quality Assurance Guidelines and Technical Assistance for Primary Care First Patient Experience of Care Survey (PCF PECS)

## Purpose of the Quality Assurance Guidelines

The Centers for Medicare & Medicaid Services (CMS) developed the Quality Assurance Guidelines for the Primary Care First Patient Experience of Care Survey (PCF PECS) (CAHPS® with PCF supplemental items) to standardize the data collection process and to make sure the survey data collected across survey vendors are comparable. The information included in this document is intended primarily for survey vendors, though PCF practice sites may also find it of interest. Survey vendors on PCF PECS are required to adhere to all aspects of these Quality Assurance Guidelines.

## Technical Assistance on PCF PECS

Survey vendors approved or interested in being approved for Primary Care First PECS (CAHPS® with PCF Supplemental Items) may use the following resources to obtain information or technical support with any aspect of the Primary Care First PEC Survey:

[pcfpecs@rti.org](mailto:pcfpecs@rti.org)833-997-2715

For general information, important news, updates and all materials to support implementation:

<https://pcfpecs.org> Exit icon

Primary care practice sites participating in the Primary Care First Model who have questions about survey administration or survey vendors should contact PCF Support:

[PCF@telligen.com](mailto:PCF@telligen.com)  
888-517-7753

Visit the Primary Care First website:  
[www.innovation.cms.gov/innovation-models/primary-care-first-model-options](http://www.innovation.cms.gov/innovation-models/primary-care-first-model-options)

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# Introduction and Overview

## About the Primary Care First Model Option

Primary Care First reflects a regionally-based, multi-payer approach to care delivery and payment. Primary Care First fosters practitioner independence by increasing flexibility for primary care, providing participating practitioners with the freedom to innovate their care delivery approach based on their unique patient population and resources. Primary Care First rewards participants with additional revenue for taking on limited risk based on easily understood, actionable outcomes.

In Primary Care First, CMS will use a focused set of clinical quality and patient experience measures to assess quality of care delivered at the practice site. A Primary Care First practice site must meet standards that reflect quality care in order to be eligible for a positive performance-based adjustment to their primary care revenue. These measures were selected to be actionable, clinically meaningful, and aligned with CMS’s broader quality measurement strategy.

The Primary Care First model is beginning January 1, 2021. The model is organized into performance years. The first performance year is January 1, 2021—December 31, 2021. CMS plans for at least five performance years. Each performance year begins January 1 and ends December 31.

One of practice sites’ requirements as a PCF participant is an annual Patient Experience of Care Survey (PECS). CMS scores practice sites’ performance on the PECS and benchmarks it against scores of all Model participants. The PECS score each year impacts practice sites’ quality score and financial recoupment for that performance year. Because of this PECS requirement, PCF practice sites are required to select a CAHPS survey vendor to administer an annual patient experience of care survey on their behalf. Only CAHPS survey vendors who have been fully approved by CMS for mixed mode surveys on a CMS program may apply for the PCF PECS program. ***Section 3.3.2, Register on the PCF PECS Web Portal and Submit Vendor Application*** outlines the process vendors follow to initiate, attain and retain approval. About the PCF PEC Survey instrument

The [CAHPS initiative](https://www.ahrq.gov/cahps/index.html) is a family of surveys developed by a consortium of researchers from the American Institutes for Research, Harvard Medical School, the RAND Corporation, and RTI International under a cooperative agreement between CMS and the Agency for Healthcare Research and Quality (AHRQ), a component of the U.S. Public Health Service.

The PCF PECS instrument is the CAHPS Clinician & Group Survey version 3.0 (known as CG‑CAHPS 3.0) with additional PCF-specific questions. Some questions are about experience in the last 6 months with the practice site in general, and other questions are about experience in the last 6 months with the primary care provider the patient saw most often at this practice site. In addition to the CG-CAHPS questions, PCF PECS’s additional questions measure the extent to which patients experienced the practice site and provider demonstrating other desirable behaviors. These behaviors are called **care delivery functions** and they are important to PCF because they help achieve PCF Model goals such as improving patient health, raising patient engagement, and reducing unnecessary spending.

The survey measures patient experience of care across 5 domains:

1. **Getting Timely Care, Appointments, and Information**. This includes questions about making routine appointments, getting care right away, extended office hours, and getting answers to medical questions when the office is closed.
2. **How Well Providers Communicate**. Questions in this domain ask how the provider explained things, listened to the patient, knew about the patient’s medical history, showed respect for what the patient had to say, and spent enough time with the patient.
3. **Patient’s Rating of Provider**. This question asks the patient to use a number from 0-10 to rate their provider.
4. **Attention to Care from Other Providers**. This includes patient experience questions about receiving test results, how knowledgeable the provider seemed about care received from other specialists, if provider gave helped the patient manage care among different providers, and if the provider followed up with the patient after a hospital or emergency room visit.
5. **Support Patients Taking Care of Own Health**. Questions in this domain ask if the provider talked with the patient about health goals, common behavior health needs, about things that make it hard to take care of their health, and about decisions related to medication.

The questions and structure of the PCF PECS is based on the instrument from CMS’ Comprehensive Primary Care First (CPC+) model. CPC+ is a payment model which has been in use since 2017. It is considered a precursor to PCF.

Detailed information about CMS’ scoring of the PCF PECS is found in ***Section 8.2,*** ***CMS Analysis of the PCF PECS Data Set***.

## About the PCF PEC Survey Administration

The PCF PECS is an annual mixed-mode (i.e., mail with telephone follow-up) survey conducted each Fall with an all-payer, all-adult sample of patients from each participating PCF practice site. Practice sites provide their patient rosters to CMS, and CMS selects a sample for each practice site, commensurate with practice site size. Detailed information on sampling is found in ***Chapter 4, Sampling Protocol*** and information on data preparation and submission are found in ***Chapters 6–7***.

The first PCF PECS will be conducted in the Fall of 2021. In general, each year of PCF will follow the same pattern, whereby practice sites’ new performance year begins in January and the PCF PEC Survey begins in the Fall. A general schedule and Performance Year 2021 schedule is presented in Table 5-1. The dates for each survey year will be updated and published on [the PCF PECS web portal](https://pcfpecs.org) Exit icon.

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# Roles and Responsibilities

## Overview

The purpose of this manual is to describe in detail the roles and responsibilities of approved CAHPS vendors administering the PCF PECS. Many of these responsibilities involve transactions and interactions with practice sites, CMS, and RTI (CMS’ contractor). Vendors will better understand their own responsibilities if they have an overview of the areas of responsibility of practice sites, CMS, and RTI. This section gives that overview.

## CMS Responsibilities

### Provide Survey Vendor Training and Approve Vendors

CMS (through its contractor, RTI International) will provide ***Introduction to the PCF PECS Training***, via webinar. Successful completion of training and passing training certification are necessary steps in attaining status as a Fully Approved vendor.

The stages of vendor approval on PCF PECS are as follows:

1. **Conditional approval.** In January 2021, CMS will invite vendors who are on the approved list of other CAHPS mixed-mode surveys as of December 1, 2020 to submit an application to PCF PECS. All vendors whose PCF PECS applications have been received by CMS (through their contractor RTI) on or before February 1, 2021 and have been found to be satisfactory will receive Conditional Approval.
2. **Full approval.** Vendors will receive Full Approval upon completion of two steps. First, survey vendors must successfully complete the Introduction to PCF PECS training and pass the training certification. Second, a vendor must submit a Quality Assurance Plan (QAP—described in ***Section 3.3.8, Submit Quality Assurance Plan*** and ***Section 10.3, Quality Assurance Plans***) for review by CMS (through their contractor RTI). Once the QAP has been deemed satisfactory, vendors will receive Full Approval.

CMS will also provide ***PCF PECS Update Training***, via webinar, on an annual basis.

### Provide Survey Administration Procedures, Technical Assistance, and Updated Information to Vendors

CMS (through its contractor, RTI International) will provide all survey administration materials and instructions. All updates will be provided promptly on the [PCF PECS web portal](https://pcfpecs.org) Exit icon. This web portal—to which all vendors will receive credentials—is the main communication channel through which vendors will access materials, updates, schedules, and transact files with CMS. Although CMS will send email notifications to survey vendors alerting them to updates, CMS recommends survey vendors accustom themselves to regularly checking the [PCF PECS web portal](https://pcfpecs.org) Exit icon for updates.

Additionally, on an annual basis, CMS will publish (1) an updated version of these ***Quality Assurance Guidelines*** comprehensive of any mid-year changes, and (2) a description of changes from the prior version. CMS will publish this document before the annual ***PCF PECS Update Training.***

Throughout PCF PECS, CMS will also:

* provide technical assistance to survey vendors via a toll-free telephone number, emails, and the [PCF PECS web portal](https://pcfpecs.org) Exit icon, (***see Section 1.2, Technical Assistance on PCF PECS***) and,
* conduct oversight and quality assurance of survey vendors (described in ***Chapter 10, Oversight***).

### Maintain and Distribute List of Approved PECS Vendors

PCF outreach and onboarding materials communicated to practice sites that they are required to contract with a CMS-approved survey vendor to conduct the PCF PECS. CMS supports practices in their requirement by assembling and maintaining an up-to-date list of PCF PECS vendors who have Full Approval. CMS is also responsible for making this list available to practice sites at least 120 days in advance of when PCF practice sites must begin conducting PECS, which is in May of each year. CMS will refresh the list annually in approximately May, and more frequently to account for any changes in vendor status. CMS will publicize this list, together with vendor contact information, on the communication portal specific to PCF practice sites and partners. The list will also be posted on the [PCF PECS web portal](https://pcfpecs.org) Exit icon.

With respect to CMS’ maintenance of the list of Approved Vendors, please note the following reasons a vendor could lose their approval status and be removed from the list:

**Vendors without clients:** Conditionally Approved and Fully Approved Vendors that

* have never had any PCF practice site clients after 2 years from the date approval as a PCF PECS vendor was granted, OR
* that have not had any clients for two years since submitting data for a PCF practice site

will lose their approved vendor status. If a vendor wishes to reinstate approval after it is removed, the vendor will need to reapply and meet all vendor requirements, including participation in and successful completion of the ***Introduction to the PCF PECS Webinar*** training session.

**Vendor withdrawals:** Any PCF PECS vendor, regardless of status, who wishes to be removed from the list should contact [pcfpecs@rti.org](mailto:pcfpecs@rti.org) with this request.

* If they have no active practice sites CMS will remove them from the list of approved vendors as soon as their request is received.
* If they have active practice sites CMS expects them to finish data collection activities of the current survey period for each client, process the data collected, and submit an XML data file for each practice site to CMS. RTI will continue to consider them an active vendor until the data submission period for the current performance year ends. As such, they will continue to receive emails sent to all survey vendors, and are expected to check the website on a regular basis to review new posted announcements. This vendor’s access to the private links on the website will remain in effect until after the data submission period deadline for the performance year ends. Consistent with the vendor’s desire to no longer participate as a vendor in PCF PECS, the vendor must inform their client practice site(s) of their decision in a timely manner so the client(s) can select and contract with another vendor for the upcoming performance years. CMS will remove withdrawing vendors from the list when the list is next updated.

**Revoked approvals:** CMS takes the quality and accuracy of the PCF PECS seriously and implements a Vendor Oversight program (described in ***Chapter 10, Oversight***) to ensure all surveys across vendors and practices are implemented according to PCF PECS training sessions and the protocols in these ***Quality Assurance Guidelines.*** If quality problems are found with a vendor, CMS typically stipulates a vendor corrective action plan. CMS may revoke a vendor’s approval status if the vendor has not fully implemented their corrective action plan.

CMS may also revoke vendors approval if they do not maintain their minimum business requirements, if appropriate members of their staff and subcontractors do not attend required training sessions, and if they do not submit an up-to-date QAP annually.

### Provide Survey Vendors with Sample Files

CMS will select the sample for each practice site. To do so, there is an annual requirement that practice sites submit to CMS a patient roster. After receiving rosters, CMS is responsible for quality control, deduplication, confirming patient eligibility, and selecting the sample for each practice site. See ***Chapter 4, Sampling Protocol,*** for detailed sampling specifications

The sample file for each PCF practice site will be available for download via a secure link on the [PCF PECS web portal](https://pcfpecs.org) Exit icon (refer to ***Exhibit 5-1, PCF PECS Survey Administration Schedule*** for timelines). The sample file will be available for download to only the practice site’s authorized vendor. When vendors are authorized for multiple practice sites, CMS will combine the appropriate practices’ samples in a single file for survey vendor download.

### Review, Score, and Report Personalized Data to Practice Sites

CMS will review all survey data submitted by vendors to identify discrepancies between data and status codes and locate inconsistent data, as described in ***Section 10.4, Data Review***. Vendors may be consulted to explain, resolve, or repair problems.

CMS will calculate summary scores as the average of the 5 domain-specific measures (shown in ***Section 2.1, About the Primary Care First Model Option***) and apply case-mix adjustments. After scoring is complete, CMS will prepare and disseminate to each practice site a personalized score report showing their results on all questions, compared to results of practice sites overall on PCF. This score report will include raw data as well as risk-adjusted, final performance scores, in a user-friendly format. This report will be disseminated via the PCF PECS web portal in the Spring after each survey.

## Survey Vendors

To understand the two phases of Vendor Approval on PCF PECS (Conditional Approval, Full Approval) please see ***Section 3.2.3, Maintain and Distribute List of Approved PECS Vendors***.

### Meet Minimum Business Requirements

Survey vendors seeking approval as a PCF PECS vendor must have the capability and capacity to collect and process all survey-related data on the PCF PECS following standardized procedures and guidelines. The business requirements that survey vendors must meet are described in ***Appendix A***. Survey vendors must adhere to all minimum business requirements throughout PCF PECS, or their approval status may be revoked by CMS (see ***Section 3.2.3, Maintain and Distribute List of Approved PECS Vendors***).

### Register on the PCF PECS Web Portal and Submit Vendor Application

* Potential survey vendors will first need to register on the [PCF PECS web portal](https://pcfpecs.org) Exit icon, which is done by completing the Vendor Registration Form. This allows vendors to obtain their username and password.
* Potential survey vendors must then designate a staff member as the PCF PEC Survey Administrator who will serve as the vendor’s main point of contact for the PCF PECS.
* Potential survey vendors will then complete and submit the Vendor Application which is available on the [PCF PECS web portal](https://pcfpecs.org) Exit icon. The submission deadline will be announced on the web portal and disseminated via email to all registered vendors.

After their applications have been reviewed by CMS, potential vendors will receive notification informing them if their application is acceptable. Vendors with acceptable applications receive Conditional Approval and may proceed with training and the balance of the steps to receive Full Approval (steps are explained in ***Section 3.2.1, Provide Survey Vendor Training and Approve Vendors***).

Each year there will be a period when potential survey vendors not currently approved for PCF PECS but who meet the minimum business requirements are invited to apply. Approved survey vendors do not re-apply unless they lose their approved status. Reasons for losing the approval status are described in ***Section 3.2.3, Maintain and Distribute List of Approved PECS Vendors***.

### Coordinate with Practice Sites

* Survey vendors must enter into a formal contract with each client PCF practice site; CMS requires that each survey vendor have a written contract with each of its facility clients.
* CMS will verify that each client PCF practice site has authorized the vendor to submit data on the practice site’s behalf.
* When practice sites merge with another practice site, split off from a practice site, or withdraw from PCF it impacts survey vendors. CMS learns about these practice-site driven changes through regular PCF communication channels, and will endeavor to notify the impacted survey vendors. Should survey vendors hear of such changes, CMS requests that survey vendors send email notification to [pcfpecs@rti.org](mailto:pcfpecs@rti.org) as well.
* Practice sites are required to update their Survey Vendor Authorization to account for switches to different survey vendors, mergers, splits and withdrawals. Vendors are responsible for understanding the details of those practice-facing requirements. They are described in ***Section 3.4.1, Authorize a Vendor to Conduct the Survey,*** below.
* CMS provides survey vendors a convenient report, the **Vendor Authorization Status Report,** which can be used to confirm that all of a vendor’s PCF practice site clients have completed or updated their Vendor Authorization forms. Survey vendors should check their Vendor Authorization Status Report weekly in the weeks leading up to the deadline for vendor authorization to make sure that all of their PCF practice site clients, especially any new or ending clients, have completed or updated the online Vendor Authorization Form. When reviewing the Vendor Authorization Status Report, please make sure all the practice site IDs, practice site names and practice site addresses match your written contract with the practice site, and ensure that the Vendor Authorization “authorization through” date encompasses upcoming current survey administration. The Vendor Authorization Status Report is available on the Vendor Dashboard
* When coordinating with practice sites, pay very close attention to Practice site Address because **PCF defines a practice site as a physical location where care is delivered.** CMS will ensure that every practice site who joins PCF has a unique address and receives a unique Practice site ID.
  + It is common for multiple practice sites who share a system affiliation to join a model like PCF as a group. Their practice site names may be very similar to each other or even indistinguishable from one another, and often their physicians work in multiple locations. In some systems or physician groups, **the only** differentiating feature is the address.
  + From a client relations perspective, vendors may find it convenient to consolidate all contact with one person for all affiliated practice sites in a system or group. When doing so, vendors must bear in mind that each practice site address makes it a unique practice site, and therefore, Practice site ID. Practice site ID will carry through all aspects of the survey, starting from the practice site’s roster to its sample which the vendor downloads, to the vendor’s conduct of the survey, to the vendor’s submission of survey results, and CMS’ scoring of the practice site.

### Attend Training and Pass Training Certification

Training dates and registration deadlines will be announced on the [PCF PECS web portal](https://pcfpecs.org) Exit icon and disseminated via email to all registered vendors. The first performance year of a survey vendor’s participation in PCF, the survey vendor must, participate in and successfully complete the Introduction to the ***PCF PECS Webinar*** training session. Participating in training includes:

* The survey vendor’s designated PCF PECS Survey Administrator must also complete a Training Certification Form after participating in the Introduction to the ***PCF PECS Webinar*** training session.
* If the survey vendor is using a subcontractor and the subcontractor will be conducting a substantial component of the work on the PCF PECS, the subcontractor’s lead PCF PECS staff member must participate in the Introduction to the ***PCF PECS Webinar*** training session and all vendor update training sessions.
* Ensure that all survey vendor staff and any subcontractors who work on the PCF PECS are trained and follow the standard PCF PECS protocols and guidelines.
* If update or refresher trainings are required, the survey vendor’s designated PCF PECS Survey Administrator must also attend those and complete their Training Certification Forms.

Following training and the submission of a QAP, the vendor receives full approval as a PCF PECS vendor. See the description of approval stages in ***Section 3.2.1, Provide Survey Vendor Training and Approve Vendors.*** Once gaining full approval as a PCF PECS vendor, vendors may begin to conduct the PCF PECS for their client practice sites.

After the survey vendor’s first year of participation in PCF PECS, survey vendors will need to attend a ***PCF PECS Update Training*** ***Webinar*** training session. Attending the full Introduction to the ***PCF PECS Webinar*** training session is not required unless the survey vendor has a new staff person serving as their Survey Administrator who has not previously attended ***Introduction to the PCF PECS Webinar*** training. Failure to attend any required training—either ***Introduction to the PCF PECS***, or ***PCF PECS Update Training***—may lead to CMS’ revocation of the vendor’s approval status (see ***Section 3.1.3, Maintain and distribute list of approved PECS vendors***).

### Sign Business Associate Agreement and Adhere to Data Security Protocols

CMS requires PCF practice sites to execute a Business Associate Agreement (BAA) with their contracted survey vendor (see ***Section 3.3.6, Execute Business Associate Agreement with Survey Vendor***).

* Survey vendors must sign the Business Associate Agreements of each client practice site. The BAA permits survey vendors access to PII, in sample files and any other practice files they receive. Survey vendors must ensure that:
  + Contacts on the BAA are correct and that all contact information is accurate.
  + Current BAAs are extended before their expiration date as needed.
  + Submit a BAA Addendum for each subcontractor that views patient-level data (e.g., name, address, telephone number).
* Survey vendors (and their subcontractors with PII access) must use systems, processes, and procedures to safeguard and protect the security of PCF PECS data. These are described in ***Appendix A, Minimum Business Requirements*** and ***Chapter 9, Data Confidentiality and Data Security***.
* Note that the only electronic transactions containing personally identifiable (PII) data shall be encrypted and be for the purpose of:
  + Obtaining the practice site’s sample file from RTI
  + Printing the survey mailing materials
  + Conducting the telephone non-response follow-up
* Survey vendors (and their subcontractors with PII access) may not share information that could identify sample patients and their survey response data with anyone. The sample file cannot be shared with practice sites, even after the survey is complete.
* Survey vendors’ QAPs will need to include information regarding how data containing PII or protected health information (PHI) are transferred within the survey vendor’s organization and between the survey vendor and any subcontractors.
* Survey vendors (and their subcontractors with PII access) must have a disaster recovery plan in place.

### Follow the PCF PECS Quality Assurance Guidelines When Conducting Data Collection and Data Processing Activities

* Survey vendors will access a personalized link to the [PCF PECS web portal](https://pcfpecs.org) Exit icon.
* Survey vendors must complete the attestation form at link and receive sample files to conduct the survey for client PCF practice sites.
* Survey vendors must administer the PCF PECS in accordance with the protocols specified in ***Chapters 4–9*** of this manual and oversee the quality of work performed by staff and any subcontractors, if applicable.
* Survey vendors must prepare and submit data files to CMS (through their contractor, RTI) following the guidelines specified in ***Chapters 6–7*** of this manual.
* Survey vendors must review all data submission reports for PCF PECS clients to ensure that data have been successfully uploaded and received by CMS.
* Survey vendors must follow guidelines in ***Chapter 8, Data Analysis and Reporting,*** when preparing reports for client practice sites.

### Attest to the Accuracy of the Data Collection Process

* In submitting their QAP, survey vendors must attest to the accuracy of their organization’s data collection processes and that data collection processes conform to the requirements outlined in this document*.*
* **Survey vendors are prohibited from subcontracting the data submission task**.
* Data collected in a manner that does not adhere to the PCF PECS procedures or timeline may result in data which CMS cannot use in calculating and reporting the practice site’s scores for the impacted performance period.
  + The Exceptions Request and Discrepancy Report processes exist to give survey vendors a way to document data collection that cannot adhere to procedures for extenuating circumstances. Prompt communication of these circumstances can prevent problems.

### Submit Quality Assurance Plan

In the first year that a vendor is participating in PCF PECS, before data collection begins and while they are considered conditionally approved, survey vendors must submit a Quality Assurance Plan (QAP) after training (see timeline in ***Exhibit 5-1).*** Submission deadlines for the QAP will be announced on the [PCF PECS web portal](https://pcfpecs.org) Exit icon and disseminated via email to all conditionally approved vendors.

The main purposes of the QAP are to provide documentation of survey vendors’ understanding, application and compliance with the ***Quality Assurance Guidelines***and to serve as the organization-specific guide for administering the PCF PECS , training project staff to conduct the survey, and conducting quality control and oversight activities.

CMS will distribute an Outline for a Model QAP (***Appendix O***) which survey vendors must follow. As shown in the outline, the QAP submission is divided into two parts, with the first submission requiring organizational information and a workplan, and the second submission several months later requiring examples of mail and telephone materials CMS deems key to survey quality.

CMS reviews all QAPs and may follow up with survey vendors for clarification, resubmission and re-review as needed. Upon CMS’ approval of the first submission of the QAP, the vendor is fully approved. This approval endures, unless the vendor loses their approval status due to one of the reasons listed in ***Section 3.2.3, Maintain and Distribute List of Approved PECS Vendors.***

In subsequent years of the project, vendors must submit QAPs annually to maintain their Full Approval status. Survey vendors are also required to update and resubmit the QAP anytime there are key personnel or protocol changes. When submitting a revised or updated QAP, vendors should highlight any changes to their QAP from the prior submission. Updated QAPs must also address any corrections made by the vendor based on feedback during the oversight process. For complete information on QAPs, see ***Section 10.3.2, Quality Assurance Plans***.

### Participate in Oversight Activities Conducted by the PCF PEC Survey Project Team

Fully approved survey vendors, including their subcontractors, must be prepared to participate in all oversight activities, such as remote site visits and/or teleconference calls, as requested by CMS or RTI, to make sure correct survey protocols are followed. All materials relevant to survey administration are subject to review. (See ***Chapter 10, Oversight*** for more detailed information regarding oversight activities.) Maintaining status as a Fully Approved vendor is contingent upon receiving satisfactory reports during oversight activities.

Note that the Vendor Application lists the participation requirements of oversight activities as well. All vendors who submitted their Vendor Application have already agreed to these requirements.

## Primary Care First Participating Practice Sites

### Authorize a Vendor to Conduct the Survey

As stated in the PCF Practice site Onboarding materials, each performance year practice sites must contract with a CMS-approved PCF PECS vendor to administer the annual PCF PECS. Practice sites can find the list of approved survey vendors on PCF Connect and on the [PCF PECS web portal](https://pcfpecs.org) Exit icon. Practice sites are responsible for the costs of the survey administration.

In order for CMS to know which vendor should receive the sample and submit data for which practice site, it is necessary to have this relationship carefully documented. This documentation is done through vendor authorization.

Practice sites are required to follow the below steps for vendor authorization:

* **Register on the** [**PCF PECS web portal**](https://pcfpecs.org)**Exit icon.** Practice sites will first need to register on the website and obtain their username and password. This will require designating one of their staff members as the PCF PECS Administrator. He or she will serve as the practice site’s main point of contact for the PCF PECS. If desired, it can be the same person serving as the practice site’s POC on the roster submission or on PCF in general. Also, this person can serve as the PCF PECS Survey Administrator for multiple practices if they wish to do so. This PCF PECS web portal affords the PCF PECS Survey Administrator the convenience of performing the necessary practice functions—such as Survey Vendor Authorization and Business Associate Agreement upload (see ***Section 3.4.6, Execute Business Associate Agreement***)—at one time for all practice sites for which they are responsible.
* **Authorize vendor.** The most key role of this point of contact is related to the vendor authorization process. Practice sites need to authorize a CMS-approved approved PCF PECS survey vendor. This is done by completing the survey vendor authorization tool on the [PCF PECS web portal](https://pcfpecs.org) Exit icon. Practice sites choose a survey vendor and the start date when they authorize that vendor to conduct the survey and submit data on their behalf. There is no authorization end date; CMS will assume that this Authorization Form reflects the wishes of the practice site. If a practice wants to change vendors, they must indicate a new vendor and new start date for that vendor.

CMS will not select and provide a patient sample for the practice site unless the vendor authorization form is completed.

* **Update authorization if needed.** Once an authorization is submitted, it remains valid unless the practice site changes it. The practice site will need to do so if it switches vendors, withdraws from PCF, splits off from its practice to form another practice, or merges with another practice.

Below are instructions for updating the Vendor Authorization in those circumstances:

* + **Switch to a different vendor.** If a practice site decides to switch vendors, they should edit Survey Vendor Authorization associated with the old vendor by selecting the new vendor’s name and entering the date this new vendor is authorized to collect and submit data for the practice site. *Please note that CMS does not recommend switching survey vendors once data collection has begun. Practices who switch vendors during data collection will have a truncated data collection timeline compared to other practices in the PCF Model. A new vendor may not be able to meet established PECS deadlines with a truncated date collection timeline and the practice risks a 0 PECS score, failing the Quality Gateway, and negative implications to Performance-Based Adjustment (PBA) for the Performance Year. CMS recommends practices make all vendor selections before sample is released or after survey vendors have submitted data.*
  + **Withdrawals.** If a practice site withdraws from PCF, they should contact PCF Support for guidance regarding the timing of their PEC Survey requirement and the Quality Gateway, pursuant to the timing of their withdrawal. If the PEC Survey is required, the practice site must have an active and up-to-date survey vendor authorization and contract with a vendor to conduct the PCF PECS.
  + **Practice site splitting into two PCF practice sites.** If a practice site splits and forms two PCF practice sites prior to the roster submission deadline, these practice sites are considered unique as far as the PCF PECS is concerned, and each practice site needs a Survey Vendor Authorization (in addition to a PECS roster that is submitted to CMS). If the split and formation occur after the roster submission deadline, the practice sites are considered a single practice site as far as the PCF PECS is concerned and must have only a single Survey Vendor Authorization and single PECS roster.
  + **Practice site mergers.** If two or more practice sites merge prior to the roster submission deadline, one practice site is designated a receiving practice site and the other practice site (or sites) are designated as withdrawing sites. The withdrawing practice site(s) need(s) to end any formerly active Survey Vendor Authorizations and survey vendor contractual arrangements if needed. Going forward, only the receiving practice site should submit a single PECS roster to CMS and a Survey Vendor Authorization. If the merge takes place after the roster submission deadline, all practice sites continue to be treated as unique as far as PCF PECS is concerned and PECS rosters and Survey Vendor Authorization are required for each practice site.

Note: Practice sites should follow standard PCF protocol for notifying PCF Support of merges, splits or withdrawals. Practice sites do not need to notify [pcfpecs@rti.org](mailto:pcfpecs@rti.org).

Note: A practice point of contact can update the Survey Vendor Authorization on behalf of multiple practices linked to the PCF PECS Survey Administrator (the linked practices are established in the Registration step).

* **Review Data Submission Summary.** Practice sites should also review the Data Submission Summary on the dashboard to ensure that the survey vendor has submitted data on time and without data problems.

### Roster Submission

Each year, practice sites must submit the all-patient roster of patients for the PCF PECS. This is submitted to PCF Support via the PCF Portal. More information about roster requirements can be found in ***Section 4.1, CMS Prepares Sample Files.*** CMS will communicate detailed roster-related instructions and schedules via ***First Edition*** and ***PCF Connect***.

Practice sites should never submit their all-patient roster to their survey vendor.

### Notify Vendor of Residential Care/Assisted Living Facilities

Patients residing in residential care facilities or assisted living facilities are eligible for PCF and therefore eligible for the PCF PECS. However, experience from the predecessor project, CPC+, teaches us that reaching these patients by mail and telephone for a survey is challenging and these challenges hamper patient response rates. Staff at these patients’ care facilities can experience significant burden from the telephone-follow-up survey. CMS has developed an evidence-based protocol to mitigate these barriers when surveying these patients, which is described below.

Practice sites must communicate to their vendor the names and addresses of residential care facilities and assisted living facilities where patients in their practice site reside. It is preferable if all such facilities can be identified, but at a minimum the practice site must identify all such facilities where 5 or more of their patients reside. To identify facilities, the practice site may scan through their patient’s addresses or may do a geographical search of nearby residential care/assisted living facilities

The vendor will be responsible for identifying these patients residing at these facilities if they are sampled. The vendor will treat these patients differently in the survey. They receive a special envelope which is designed to catch the attention of facility staff and solicit proxy respondents. They also do not receive telephone follow-up due to the burden this causes facility staff.

### Communicate With Patients About the Survey in Accordance with CMS Specifications

Practice sites should be well-informed about the survey, communicate their support of it, and answer patient questions about the survey with confidence. These are key tools for attaining good response rates.

Note: All patient-facing survey materials refer to the survey as the Patient Experience of Care Survey and do not mention Primary Care First. Explaining the program and the practice site’s participation is an unnecessary distraction for most patients.

Practice sites must adhere to the following specifications:

* **Hang the poster.** A CMS-developed poster (***Appendix M***) will be provided to practices. Practice sites must download the poster and hang at least one poster in a well-visible area of their practice site beginning 6 months before the survey’s first mailout (see timeline in ***Exhibit 5-1, PCF PECS Survey Administration Schedule***).
* **Print Waiting Room FAQs.** CMS-developed Waiting Room FAQs (***Appendix N***) will be given (in electronic format) to all vendors and posted on PCF Connect. Practice sites must print these and keep them in their waiting rooms beginning 6 months before the survey begins.They can be removed after the survey ends.
* **Become familiar with Waiting Room FAQs.** It is common for patients who are contacted by the survey to seek assurance from their providers that the survey is legitimate. Therefore, practice site staff should be aware of the survey basics so they can respond to questions with confidence.
* **Respond to patient questions and comments about the survey.** If a patient talks to practice staff about the survey, practice staff should adhere to the following rules regarding statements for patients.

The following are appropriate:

* + Answering any question according to the response given in the Waiting Room FAQs.
  + Telling patients that they may be asked to participate in the Patient Experience of Care survey from your practice site.
  + Telling patients that the survey is legitimate.
  + Telling patients that their response, while voluntary, is valued and paid attention to.
  + Most importantly, express your support of the survey with statements such as, “We are supportive of the survey and want to hear feedback from our patients” or “We think the survey is important.”

Appropriate answers with respect to assuring patients of confidentiality:

* + This survey is public health research. HIPAA allows the release of patient contact information for the purpose of public health research.
  + This practice site has no way of knowing who responded to the survey. Patients’ answers on the survey, whether negative or positive, are valued.
  + Their survey responses will never be reported with their name or other identifying information.
  + All respondents’ survey responses will be reported in aggregate.
  + They can skip or refuse to answer any question they do not feel comfortable with.
  + Their participation in the study will not affect their care at this practice site or Medicare benefits that they currently receive or expect to receive in the future.

Practice sites must take care not to influence patients’ answers on the survey. Therefore, practice site staff **may not do** any of the following:

* + Provide a copy of the PCF PECS questionnaire or survey materials to their patients.
  + Attempt to determine which patients were sampled. Vendors are strictly prohibited from sharing this information with practice sites both before and after the survey administration.
  + Ask their patients if they would like to be included in the survey.
  + Tell patients that the practice site or provider hopes or expects their patients will give them the best or highest rating.
  + Imply that the practice site, its personnel or its agents will be rewarded or gain benefits for positive feedback.
  + Offer incentives of any kind to patients for participating (or not) in the PCF PECS.
  + Include any messages or materials promoting the practice site in PCF PECS materials, including mail survey cover letters, questionnaires, and telephone interview scripts.
  + Use the PCF PECS to identify or ask about other patients who are looking for a primary care practice site
  + Translate the survey into the patient’s language. (A translation provided by the patient’s family member or friend is appropriate.)

### Administering PCF PECS in Conjunction with Other Surveys

Some practice sites may wish to conduct other patient experience of care or satisfaction surveys to support internal quality improvement activities. A formal survey, regardless of the data collection mode employed, is one in which the primary goal is to ask standardized questions of the practice site’s patient population. In contrast, contacting patients to assess their care at any time or calling a patient to check on services received are both considered to be routine patient contacts, not surveys.

To avoid imposing on patients, CMS strongly encourages practice sites to refrain from conducting other patient surveys from 4 weeks prior to and during the period when the PCF PECS is actively surveying. CMS-sponsored surveys are exempt from this guidance.

In addition, CMS strongly encourages practice sites to refrain from conducting census surveys. Census surveys ensure that some respondents are surveyed at least twice and will increase survey burden on respondents, thereby lowering response rates on PCF PECS as well as on the practice site’s other survey(s).

When conducting other surveys, practice sites must follow these rules:

* Do not ask patients any additional survey questions that are the same as or similar to those included in the PCF PECS questionnaire. (This guidance does not apply to other CMS-sponsored surveys).

Other surveys can include questions that ask for more in-depth information as long as the questions are different from those included in the PCF PECS.

### Execute Business Associate Agreement (BAA) with Survey Vendor

HIPAA allows practices to release patient contact information to their agents for the purpose of public health research.

Survey vendors will be acting as agents of PCF practices. When a vendor is a Business Associate of a practice site, vendors inherit all of a practice’s HIPAA requirements with regard to data use and safeguarding. Therefore, each practice site must execute a BAA with their survey vendor. More information about Business Associates can be found here: <https://www.hhs.gov/hipaa/for-professionals/privacy/guidance/business-associates/index.html>. An example BAA can be downloaded from here: <https://www.hhs.gov/hipaa/for-professionals/covered-entities/sample-business-associate-agreement-provisions/index.html>.

Each practice site must upload an electronic copy of the signed BAA with their survey vendor to the PCF PECS web portal. CMS will not release a practice site’s sample to their survey vendor unless a correct and executed BAA has been received by CMS (via their contractor RTI).

# Sampling Protocol

## Overview

CMS (through their contractor RTI) is responsible for selecting the patient sample for each PCF practice site. Vendors should be knowledgeable about patient eligibility and CMS’ sample file cleaning, deduplicating, and sample selection procedures. This is described in ***Section 3.2.4, Provide Survey Vendors with Sample Files***.

## CMS Prepares Sample Files

CMS is responsible for creating the sample for each PCF practice site based on patient rosters supplied to CMS by the practice sites. The following are specifications practices sites follow when preparing the roster:

* All payers, self-pay, or no insurance
* Ages 18 and above
* All patients who had at least one visit. The visit window begins on January 1 of the Performance Year and ends whenever the practice site submits their roster.
  + For example, Performance Year 1 shows a typical schedule. The visit window begins January 1, 2021 and practice sites must submit their rosters between June 15 and July 12, 2021.
  + If the patient had any visit in the window, in-person or telehealth, they are eligible.
* Exclude as ineligible: patients who are deceased, who reside in nursing homes/skilled nursing facilities, and patients whose addresses are outside the US.
* People who live in residential care/assisted living facilities are eligible.

**Roster cleaning and quality control:** Before CMS samples, it conducts extensive quality control on the rosters to ensure all data known to be invalid is removed and all known issues are corrected. Practice sites may be asked to repair and resubmit rosters to correct issues and inconsistencies. CMS removes patients whose addresses are outside of the 50 States and the District of Columbia, patients with insufficient information about their names (e.g., patients without a first name or last name or with initials only), insufficient contact information to attempt the survey (e.g., patients must have a complete address), and any ineligible patients (under age 18). CMS also searches for duplicated patients within a practice site and across practice sites. In the event of patients duplicated across practice sites, the patient is assigned to the practice site nearer to their home, but if both practice sites are near the patient’s home the patient is assigned to the practice site with the more recent visit.

**Sampling:** When all cleaning and quality control is complete, CMS will select a systematic random sample of patients from each practice site, commensurate with practice site size, as shown in ***Exhibit 4-1*** below.

Exhibit 4-1  
Number of Patients CMS will sample, By Practice site Size Strata

| Providers in Practice Site | Patients CMS will Sample | Target Number of Completed Surveys |
| --- | --- | --- |
| 1 | 296 | 105 |
| 2 | 350 | 124 |
| 3 | 450 | 159 |
| 4–9 | 500 | 177 |
| 10–13 | 550 | 195 |
| 14–19 | 650 | 230 |
| 20 or more | 800 | 284 |

If there is a practice site with an insufficient number of eligible patients to sample, CMS will select a census.

The target number of completed surveys are based on a reliability criterion recommended by the CAHPS Consortium for quality reporting programs like PCF. Based on similar experience, we expect an average response rate of 35.5%, PCF-wide.

## Vendors Download Sample for Practice Site(s)

Approximately 2 weeks before the data collection period begins, the sample files will be available to vendors to download via a secured link on the [PCF PECS web portal](https://pcfpecs.org) Exit icon. An email will be sent to all fully approved survey vendors alerting them that the sample for their PCF practice site clients is available to be downloaded. CMS will not release a sample file for a practice site until that practice site has (1) authorized the vendor on the PCF PECS web portal and (2) uploaded their executed BAA with their survey vendor to the PCF PECS team (see ***Section 3.4.6, Execute Business Associate Agreement With Survey Vendor*** in the “Primary Care First Practice Site Responsibilities” section and ***Section 3.3.5, Sign Business Associate Agreement and Adhere to Data Security Protocols,*** in the “Survey Vendor Responsibilities” section.

Survey vendors will be required to download the sample file within 2 business days after the sample files are made available on the [PCF PECS web portal](https://pcfpecs.org) Exit icon. A schedule showing the vendor authorization date, sample file distribution date, the date by which survey vendors must download the sample file, and the data submission deadline will be posted on the [PCF PECS web portal](https://pcfpecs.org) Exit icon well in advance of the deadlines.

Once sample files are available, survey vendors will use their credentials to log into the secure links on the web portal and follow the download instructions that will be posted to retrieve their sample files. Survey vendors will also receive a supplemental sample file:

* **Sample File Summary Report.** A report that corresponds with each vendor’s sample file, showing the number of patients sampled for each of the practice sites that authorized that vendor to collect and submit PCF PEC Survey data on its behalf.

Before downloading the sample files for the annual PCF PECS, each survey vendor will be required to attest that it is taking responsibility for the sample file, which includes patient-level information for all sampled patients for each of the vendor’s PCF practice site clients. Once the file is downloaded and securely saved, vendors should use the password that was sent to the Survey Administrator to open, decrypt, and review the sample file to verify that the file contains a sample for each practice site that has authorized the vendor to administer the survey on its behalf.

## Sample File Variables

The sample file to be downloaded by the survey vendor will be a Microsoft Excel spreadsheet containing contact information (information needed to administer the survey) for each sampled patient. The sample patient variables contained in each sample file are listed in ***Exhibit 4‑2***. If a survey vendor is authorized to administer the survey on behalf of multiple PCF practice sites, patient information for sampled patients from all of the PCF practice sites that have authorized the survey vendor will be included in one Excel file and will be sorted by Practice Site ID.

Exhibit 4-2  
Variables Included in PCF PECS Sample Files

| Column Name | Field Length | Valid Codes | Field Contents |
| --- | --- | --- | --- |
| VendorID | 3 | Numeric | Individual identification number assigned to each vendor |
| Practice site\_ID | 6 | Text | The PCF practice site ID |
| P\_Name | 64 | Text | PCF Practice site Name |
| P\_Street\_Address1 | 64 | Alpha\_numeric | PCF Practice site Street Address 1 |
| P\_Street\_Address2 | 64 | Alpha\_numeric | PCF Practice site Street Address 2 |
| P\_CITY | 64 | Text | PCF Practice site City |
| P\_STATE | 2 | Text | PCF Practice site State |
| P\_ZIP\_Code | 5 | Numeric | PCF Practice site ZIP Code |
| First\_Name | 30 | Text | Sample Patient’s first name |
| Last\_Name | 40 | Text | Sample Patient’s last name |
| Street\_Address\_1 | 50 | Alpha\_numeric | Patient’s mailing address (Line 1—street address) |
| Street\_Address\_2 | 50 | Alpha\_numeric | Patient’s mailing address (Line 2—street address) |
| CITY | 40 | Text | Patient’s mailing address—City |
| STATE | 2 | Text | Patient’s mailing address—State |
| ZIP\_Code | 5 | Numeric | Patient’s mailing address—ZIP Code |
| Telephone\_Number | 10 | Numeric | Patient’s telephone number |
| DOB | 8 | MM/DD/YYYY | Patient’s date of birth |
| Gender | 1 | 1–2 | Gender Code: M = Male, F = Female |
| Language | 1 | Numeric | 1 = Spanish 2 = Language other than English or Spanish. *If blank, patient is presumed to speak English.* |
| SID | 10 | Alpha\_numeric | The unique patient sample identification number assigned to the sample patient. *Must be maintained with the patient.* |
| PRO\_Names1to4 | 120? | Text | Provider 1 First Name Last Name,  Provider 2 First Name Last Name,  Provider 3 First Name Last Name,  Provider 4 First Name Last Name  Medical staff in practice. First and last names are delimited by a space. Staff are delimited by a comma followed by a space. |
| PRO\_Names5to8 | 120? | Text | Provider 5 First Name Last Name,  Provider 6 First Name Last Name,  Provider 7 First Name Last Name,  Provider 8 First Name Last Name  Medical staff in practice. First and last names are delimited by a space. Staff are delimited by a comma followed by a space. Blank if none. |
| PRO\_Names9to12 | 120? | Text | Provider 9 First Name Last Name,  Provider 10 First Name Last Name,  Provider 11 First Name Last Name,  Provider 12 First Name Last Name  Medical staff in practice. First and last names are delimited by a space. Staff are delimited by a comma followed by a space. Blank if none. |
| PRO\_Names13to16 | 120? | Text | Provider 13 First Name Last Name,  Provider 14 First Name Last Name,  Provider 15 First Name Last Name,  Provider 16 First Name Last Name  Medical staff in practice. First and last names are delimited by a space. Staff are delimited by a comma followed by a space. Blank if none. |
| PRO\_Names17to20 | 120? | Text | Provider 17 First Name Last Name,  Provider 18 First Name Last Name,  Provider 19 First Name Last Name,  Provider 20 First Name Last Name  Medical staff in practice. First and last names are delimited by a space. Staff are delimited by a comma followed by a space. Blank if none. |
| PRO\_Names21to24 | 120? | Text | Provider 21 First Name Last Name,  Provider 22First Name Last Name,  Provider 23 First Name Last Name,  Provider 24 First Name Last Name  Medical staff in practice. First and last names are delimited by a space. Staff are delimited by a comma followed by a space. Blank if none. |
| PRO\_Names25to28 | 120? | Text | Provider 25 First Name Last Name,  Provider 26 First Name Last Name,  Provider 27 First Name Last Name,  Provider 28 First Name Last Name  Medical staff in practice. First and last names are delimited by a space. Staff are delimited by a comma followed by a space. Blank if none. |
| PRO\_Names29to32 | 120? | Text | Provider 29 First Name Last Name,  Provider 30 First Name Last Name,  Provider 31 First Name Last Name,  Provider 32 First Name Last Name  Medical staff in practice. First and last names are delimited by a space. Staff are delimited by a comma followed by a space. Blank if none. |
| PRO\_Names33to36 | 120? | Text | Provider 33 First Name Last Name,  Provider 34 First Name Last Name,  Provider 35 First Name Last Name,  Provider 36 First Name Last Name  Medical staff in practice. First and last names are delimited by a space. Staff are delimited by a comma followed by a space. Blank if none. |
| PRO\_Names37to40 | 120? | Text | Provider 37 First Name Last Name,  Provider 38 First Name Last Name,  Provider 39 First Name Last Name,  Provider 40 First Name Last Name  Medical staff in practice. First and last names are delimited by a space. Staff are delimited by acomma followed by a space. Blank if none. |
| PRO\_Names41to44 | 120? | Text | Provider 41 First Name Last Name,  Provider 42 First Name Last Name,  Provider 43 First Name Last Name,  Provider 44 First Name Last Name  Medical staff in practice. First and last names are delimited by a space. Staff are delimited by acomma followed by a space. Blank if none. |
| PRO\_Names45to48 | 120? | Text | Provider 45 First Name Last Name,  Provider 46 First Name Last Name,  Provider 47 First Name Last Name,  Provider 48 First Name Last Name  Medical staff in practice. First and last names are delimited by a space. Staff are delimited by a comma followed by a space. Blank if none. |
| PRO\_Names49to52 | 120? | Text | Provider 49 First Name Last Name,  Provider 50 First Name Last Name,  Provider 51 First Name Last Name,  Provider 52 First Name Last Name  Medical staff in practice. First and last names are delimited by a space. Staff are delimited by a comma followed by a space. Blank if none. |
| PRO\_Names53to56 | 120? | Text | Provider 53 First Name Last Name,  Provider 54 First Name Last Name,  Provider 55 First Name Last Name,  Provider 56 First Name Last Name  Medical staff in practice. First and last names are delimited by a space. Staff are delimited by a comma followed by a space. Blank if none. |
| PRO\_Names57to60 | 120? | Text | Provider 57 First Name Last Name,  Provider 58 First Name Last Name,  Provider 59 First Name Last Name,  Provider 60 First Name Last Name  Medical staff in practice. First and last names are delimited by a space. Staff are delimited by a comma followed by a space. Blank if none. |
| PRO\_Names61to64 | 120? | Text | Provider 61 First Name Last Name,  Provider 62 First Name Last Name,  Provider 63 First Name Last Name,  Provider 64 First Name Last Name  Medical staff in practice. First and last names are delimited by a space. Staff are delimited by a comma followed by a space. Blank if none. |
| PRO\_Names65to68 | 120? | Text | Provider 65 First Name Last Name,  Provider 66 First Name Last Name,  Provider 67 First Name Last Name,  Provider 68 First Name Last Name  Medical staff in practice. First and last names are delimited by a space. Staff are delimited by a comma followed by a space. Blank if none. |
| PRO\_Names69to72 | 120? | Text | Provider 69 First Name Last Name,  Provider 70 First Name Last Name,  Provider 71 First Name Last Name,  Provider 72 First Name Last Name  Medical staff in practice. First and last names are delimited by a space. Staff are delimited by a comma followed by a space. Blank if none. |
| PRO\_Names73to76 | 120? | Text | Provider 73 First Name Last Name,  Provider 74 First Name Last Name,  Provider 75 First Name Last Name,  Provider 76 First Name Last Name  Medical staff in practice. First and last names are delimited by a space. Staff are delimited by a comma followed by a space. Blank if none. |
| PRO\_Names77to80 | 120? | Text | Provider 77 First Name Last Name,  Provider 78 First Name Last Name,  Provider 79 First Name Last Name,  Provider 80 First Name Last Name  Medical staff in practice. First and last names are delimited by a space. Staff are delimited by a comma followed by a space. Blank if none. |
| PRO\_Names81-84 | 120? | Text | Provider 81 First Name Last Name,  Provider 81 First Name Last Name,  Provider 83 First Name Last Name,  Provider 84 First Name Last Name  Medical staff in practice. First and last names are delimited by a space. Staff are delimited by a comma followed by a space. Blank if none. |

## Vendors Implement Sample File Download Quality Control Procedures

The following section includes both required and recommended steps for incorporating quality control on the receipt and processing of sample files provided by CMS.

**Required Sample File Download Quality Control Procedures:**

* Survey vendors must have the appropriate electronic equipment and software to securely download their PCF practice sites clients’ sample files from the [PCF PECS web portal](https://pcfpecs.org) Exit icon, in addition to ensuring controlled access to the data (e.g., password protections, firewalls, data encryption software, personnel access limitation procedures, and virus and spyware protection).
* Upon download of the sample file, survey vendors must open the file and verify that the file contains a sample for all their PCF practice site clients.
  + The sample file will contain the number of patients sampled for each practice site. If the file does not contain a sample for one or more of a survey vendor’s practice site’s clients, the vendor should check to make sure that the practice site has completed and submitted the online Authorize a Vendor form, which authorizes the vendor to collect and submit PCF PECS data on its behalf. If the practice site has not done so, the vendor and practice site should notify CMS immediately by contacting [pcfpecs@rti.org](mailto:pcfpecs@rti.org) Remember that CMS will not distribute sample files to survey vendors unless the practice site has completed the vendor authorization form and uploaded their executed BAA with the survey vendor to [the PCF PECS web portal](https://pcfpecs.org/) Exit icon.
  + If you confirm that a PCF practice site has completed the vendor authorization, and you did not receive a sample file for that practice site, contact [pcfpecs@rti.org](mailto:pcfpecs@rti.org) soon as possible.
* If you received a sample file for a practice site that you will not be collecting data from because of nonpayment or other issues, please alert [pcfpecs@rti.org](mailto:pcfpecs@rti.org) immediately.
* Survey vendors must check the file to make sure that one or more patients were sampled for each of their practice site clients and that the number of patients for which sample information is provided matches the number of patients indicated as having been sampled on the **Sample File Summary Report**. Practice sites should also check that this number aligns with the number of anticipated sampled cases shown in ***Section 4.2, CMS Prepares Sample Files***.
* Immediately report any discrepancies or problems detected with the sample file to [pcfpecs@rti.org](mailto:pcfpecs@rti.org), or calling the PCF PECS toll-free telephone number at **833-997-2715**.

**Recommended Sample File Download Quality Control Procedures:**

* Once downloaded, survey vendors are advised to store the sample files in an encrypted format at all times when not in use. We highly recommend that survey vendors only use unencrypted sample files when access to the patient information is required.
* Survey vendors will be required to download the sample file within 2 business days after the sample files are made available on the [PCF PECS web portal](https://pcfpecs.org) Exit icon. We strongly urge survey vendors to NOT wait until the final day to download their sample file. Downloading the sample file early ensures sufficient time to notify CMS (through their contractor, RTI) of any technical issues, problems or discrepancies in the sample file.

## Vendors Prepare the Survey Sample for Each Practice Site

### General Instructions

Survey vendors must follow the following instructions:

* **Maintain SID.** CMS will assign a unique sample identification (SID) number to each sampled patient and will include this in the sample file. Vendors must ***not*** change this number but can use an internal patient ID number. If an internal patient ID number is assigned to patients, the vendor must have a secure way to link the internal patient ID number assigned to each patient to the SID number assigned by CMS.
* **Ask practice site about their name.** Vendors should ask their client PCF practice site for the practice site’s name that sample patients will recognize, and use that name in the survey cover letter, the mail survey questionnaire, and telephone script. It is possible the patient-recognizable name will differ from the name on the sample file, if the practice site has elected to use a legal or other name in PCF.
* **Updates from the practice site.** Survey vendors are permitted to ask practice sites to provide updated addresses and/or telephone numbers for all patients they treated during the sampling window, if the vendor has an appropriate agreement with the practice site and if this will be transmitted through an encrypted file or secure link. ***To maintain and protect the identity of patients sampled, it is very important that survey vendors do not provide PCF practice sites with any information about patients included in the PCF PECS.***

In considering whether to request updated address and/or telephone numbers from the practice site, survey vendors should note that the sample file is created from information practice sites supply CMS from their EHR system. Most practice sites confirm patient addresses at each visit, and CMS typically finds the PECS addresses to be current.

### Identify Patients Residing in Facilities

As described in ***Section 3.3.3, Coordinate with Practice Sites***, CMS requires each practice site to give its survey vendor the names and addresses of residential care facilities/assisted living facilities where its patients live. In giving the specifics of this requirement,

CMS tells practice sites it is preferable if all such facilities can be identified, but at a minimum the practice site must identify all such facilities where 5 or more of their patients reside. To identify facilities, CMS allows them to scan through their patients address or do a geographical search of nearby residential care/assisted living facilities.

It is the vendor’s job to flag all patients on the sample file who live in one of these facilities. In searching for the practice site-identified names and addresses, survey vendors must consider that facility’s addresses and names may not be in uniform format across patients on the sample file. For example, the facility’s name may appear in Line 1 for some patients and Line 2 for other patients. The facility’s street address may be spelled or abbreviated differently for different patients. Nevertheless, it is important for the vendor to identify facility cases because these patients have a different data collection protocol. In the mail portion, they receive a slightly different outgoing envelope, and they are not included in the telephone follow-up survey.

### Sampled Cases to Remove

If a PCF PECS patient is on the survey vendor’s Do Not Contact List, based on a previous contact for another survey conducted by the survey vendor, the vendor should honor that patient’s request. These sample patients should not be sent any PCF PECS mailing materials (prenotification postcard, questionnaire packages, reminder postcard) or called during the telephone follow-up and should instead be assigned a final disposition code of 200—Excluded from Survey. This process of checking the survey vendor’s Do Not Contact patients against the PCF PECS sample file must be repeated each year before the PCF PECS survey is administered, and any Do Not Contact patients should not be administered the PCF PECS.

If a PCF PECS patient is contacted and categorized as a hostile refusal on the PCF PECS, the vendor should assign that patient a final disposition code of 230—Hostile Refusal. The vendor should store this information to ensure they do not contact that patient again in the current or future survey administrations of PCF PECS.

If the practice site switches to a different survey vendor, the first survey vendor must make CMS’ contractor RTI aware of any accumulated PCF PECS Hostile Refusals. RTI will ensure these patients are not sampled again for future rounds.

### Employ Address Standardization and Forwarding Address Techniques

After the sample file is downloaded, survey vendors must verify **each** mailing address that is included in the sample file provided by CMS using a commercial address update and standardization service, such as the National Change of Address. When a new/forwarding address for a patient is known, the survey vendor should take advantage of that and send the mailing to the forwarding address.

As a reminder, the sample files received by vendors should contain no patient addresses which are US Territories, APO/FPO addresses, or outside the US, as any such addresses have been previously removed by CMS (see ***Section 4.2, CMS Prepares Sample Files***). Should vendors discover any such addresses they should not include these patients in survey and give them a status code of 200—Excluded From Survey (see ***Exhibit 5-2, PCF PECS Final Status Codes***).

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# Data Collection Protocol

## Overview

All survey vendors will use a standardized mixed-mode data collection protocol consisting of mail with telephone follow-up, offered in both English and Spanish. The 12-week protocol calls for a pre-notification post card, a survey mailing, reminder postcard, a second survey mailing to non-respondents, and a telephone follow-up of non-respondents using computer-assisted telephone interviewing. There are small changes to this protocol for patients who are identified as residing in residential care facilities. A patient-facing poster and FAQs in each practice site, and a patient-facing Help Desk operated by each survey vendor, are other required elements of this protocol. See ***Figure 5-1*** for the schedule showing timing of mailouts and the telephone follow-up over the 12-week period.

This protocol is designed to achieve as high a response rate as possible and ensures that data collection is consistent across participating PCF practice sites. The CPC+ PECS model, a precursor to PCF PECS, used a similar protocol and attained an overall response rate above 35%, with some practice sites achieving a much higher rate. Survey vendors must make every reasonable effort to ensure optimal response rates, and are expected to pursue contacts with potential respondents until the full data collection protocols has been completed.

Survey vendors must follow all required specifications for the mail with telephone follow up, and data scanning or key entry, described in this chapter.

The schedule of activities for vendor approval, survey data collection and oversight for Performance Year 1 of the PCF PEC Survey schedule is shown ***Exhibit 5-1***.

Exhibit 5-1  
PCF PECS Administration Schedule

| Activity | Performance Year 1  (January 1–December 31, 2021) Timing |
| --- | --- |
| Conditionally-approved vendors attend training | March 24, 2021 |
| Conditionally-approved vendors submit Quality Assurance Plans (QAP) to PCF PECS Team | No later than April 16, 2021 |
| RTI reviews QAPs and provides feedback to vendors | No later than April 30, 2021 |
| Conditionally-approved vendors resubmit QAPs where required | May 14, 2021 |
| List of fully-approved PCF PECS vendors is disseminated (120 days before survey begins) | May 28,2021 |
| Deadline for PCF practice sites to authorize a PCF PECS vendor | June 30, 2021 |
| PCF Practice sites receive poster and Waiting Room FAQs from CMS, and begin displaying in prominent locations in site | March 13, 2021 |
| Deadline for PCF practice sites to notify vendors of names and addresses of residential care facilities in their catchment area | July 31, 2021 |
| Deadline for PCF PECS vendors to notify client practices of their toll-free number that must be updated on the poster | August 13, 2021 |
| Fully-approved PCF PECS vendors resubmit approved QAP with completed templates of all mail and telephone survey materials | August 13, 2021 |
| Deadline for PCF practice sites to upload to the PCF PECS web portal the executed copy of BAA with their authorized/contracted survey vendor | August 30, 2021 |
| RTI uploads sample files to PCF PEC Survey website | September 13, 2021 |
| PCF PECS vendors mail teaser postcard to all sampled patients | September 28, 2021 |
| PCF PECS vendors begin operating inbound patient-facing help desk | September 29, 2021 |
| PCF PECS vendors mail Questionnaire 1 to all sampled patients | October 5, 2021 |
| PCF PECS vendors mail Thank you/reminder postcard to all sampled patients | October 12, 2021 |
| PCF PECS vendors submit interim mail data file | October 26, 2021 |
| PCF PECS vendors mail Questionnaire 2 to sampled patients who have not responded | November 2, 2021 |
| PCF PECS vendors start telephone follow-up, among sampled patients who have not responded | November 30, 2021 |
| PCF PECS vendors submit interim mail/CATI data file | December 8, 2021 |
| PCF PECS vendors submit telephone interviewer recordings | December 8, 2021 |
| PCF PECS vendors supply documentation of interviewer training, including HIPAA training | December 8 2021 |
| PCF PECS vendors end telephone follow-up and close Help Desk | December 21, 2021 |
| Last day to receive questionnaires by mail. PCF PECS vendors must discard questionnaires received after this date | December 21, 2021 |
| PCF PECS vendors submit patient data to RTI PECS team | January 18, 2022 |
| PCF PECS practices may remove posters and Waiting Room FAQs | January 19, 2022 |

## Schedule of Mail with Telephone Follow-up Protocol

***Figure 5-1*** displays the data collection schedule for the mail with telephone follow-up protocol.

Figure 5-1  
Mail with Telephone Follow-up Timing

## Support Survey Administration in Spanish

All practice sites and vendors are required to offer survey administration in Spanish. CMS will provide all Spanish translations.

* The **poster and Waiting Room FAQs** are in both English and Spanish.
* Both **postcards** are in English but a line in Spanish states that if they prefer to receive the questionnaire in Spanish, they should call the toll-free number. Vendors must honor these requests and send a Spanish questionnaire.
* The **initial and non-response letters** have English on one side, Spanish on the other.
* The questionnaire is available in both English and Spanish.
* The **first questionnaire** must be sent in English to all patients. A line in Spanish states that if they prefer to receive the questionnaire in Spanish, they should call the toll-free number. Vendors must honor these requests and send a Spanish questionnaire, at a minimum for the 2nd questionnaire mailing. (If a practice site is comprised heavily of Spanish speakers and the survey vendor would like to send Spanish questionnaires for the first questionnaire, the survey vendor should contact [pcfpecs@rti.org](mailto:pcfpecs@rti.org) to discuss. Note the PCF model is not in operation in Puerto Rico.)
* The **second questionnaire** must be sent in Spanish to patients who are indicated as Spanish speakers on the sample file.
* Survey vendors must provide Spanish-speaking **Help Desk** personnel. Sufficient Spanish-speaking personnel, commensurate with the volume of Spanish speaking population of their client practices, must be provided.
* Survey vendors must provide Spanish-speaking **telephone interviewers** commensurate with the volume of Spanish-speaking population of their client practices.
* FAQs for telephone interviewers/Help Desk staff are provided in both English and Spanish.
* Vendors and practice sites are not permitted to translate the survey into other languages at this time. CMS may provide additional languages in upcoming years of PCF.

## Facilitate Completions by Sample Member Helpers and Proxies

The survey instrument allows patients who are unable to complete the survey to have someone knowledgeable about their health care, such as a family member or friend, take the survey on their behalf (known as a “proxy”) or help the patient with the survey (known as a “helper”). Helpers and proxies typically help patients who are too ill to take the survey or who have physical or cognitive limitations. Note that **staff or clinicians at the practice site may not serve** as proxies or helpers.

As shown on the final question of the survey, helpers can:

* Read questions
* Write down the answer the patient gave
* Translate the questions into the patient’s language
* Help in another ways

To raise awareness of the proxy/helper option, the PCF PECS letters, postcards, poster, FAQs and telephone scripts clearly state that someone can help the patient take the survey.

Survey vendors must ensure that telephone interviewers and Help Desk staff stay attuned to people declining survey participation because of the patient’s health, disability, or language. These barriers can be overcome with a proxy or a helper, which should be encouraged and facilitated by survey vendor personnel.

## Administer Mail Protocol

### Teaser Postcard

The teaser postcard is a prenotification sent to all sampled patients. It provides information about the purpose of the survey and alerts patients (and their potential proxies/helpers) that they will be contacted within a few days and invited to participate in the survey.

Figure 5-2  
Teaser Postcard Timing

#### Timing

The teaser postcard (***Appendix C***) is mailed approximately two weeks after receipt of the sample file. Prior to mailing, the survey vendor is required to use a commercial address standardization (see ***Section 4.6.4, Employ Address Standardization and Forwarding Address Techniques***) and ensure the mailing addresses reflect any updates or forwarding addresses from the commercial service.

#### Formatting and Printing

The teaser postcard can be downloaded from the [PCF PECS web portal](https://pcfpecs.org) Exit icon.

* No text, image, or logos may be altered, added or removed except as follows:
  + On the side with the image and text, survey vendors must insert their own Help Desk email address and toll-free number.
  + On the side with the address, on the row beneath Patient Experience of Care, survey vendors should put their own mailing address. The DHHS logo must not be modified in any way but vendors may choose to replace it with their own vendor logo.
* The printed size of the postcard must be at least 4.25” x 6”, a two-sided postcard
* The minimum paper weight of the postcard is 79# card stock (meets a 7pt minimum caliper)
* Survey vendors may elect to print the image in color or black and white.
* Survey vendors may elect to use colored ink instead of black ink, or colored paper instead of white paper, provided good judgement is used for visible contrast and acuity.
* Updates from the Post Office such as Address Service and Change Service are optional.
* Vendors may not place the SID created by CMS, nor any other sample tracking number created by the vendor, on the postcard.

#### Mailing

The teaser postcard is mailed first class. It may be stamped or bear permit-paid indicia.

### Questionnaire Mailout #1: Letter, Questionnaire, BRE, Envelopes, and Envelope for Sample Members Residing in Residential Care Facilities

#### Timing

The first questionnaire mailing (***Appendix D***) is mailed approximately three weeks after receipt of the sample file (or one week after the teaser postcard).

Figure 5-3  
First Questionnaire Timing

#### Required and Optional Formatting and Printing Guidelines

**Letter:**

* The letter must be printed on a separate sheet of paper and not attached to the survey.
* It must have English on one side, Spanish on other side.
* It must use text of letter from the [PCF PECS web portal](https://pcfpecs.org) Exit icon customized with survey vendor Help Desk information.
* The letter must contain salutation Dear before patient’s full name.
* It must be printed using survey vendor logo and return address (or mail processing subcontractor’s return address).
* The letter must be signed by senior employee of the survey vendor and include the last date of each mailing.
* The letter must use a font size equal to or larger than Times New Roman 11 or Arial 11-point font.
* The SID or other sample tracking number may be printed on letter. A barcode may be printed as well.
* Optional: Survey vendors may use windowed envelopes as a quality measure to ensure that each envelope is associated with the correct letter.

**Questionnaire:**

The survey vendor is expected to download the survey from the [PCF PECS web portal](https://pcfpecs.org) Exit icon. Survey vendors may make minor modifications to the format and layout of the surveys, but must adhere to the following specifications in formatting and producing the PCF PECS mail surveys:

* The image and full survey title must be placed on the cover.
* The name of the practice, office location, and Spanish sentence must be placed on the cover.
* A tracking ID linked to the Unique Sample ID must be printed on each survey. A barcode is also acceptable.
* The Tracking ID differentiates between first and second questionnaires.
* The instructions for completing must remain on the top of the first page of the survey.
* Question and answer category wording must not be changed.
* No changes are permitted to the order of the survey items.
* The “About You” items cannot be eliminated from the survey.
* No changes are permitted to the order of the answer categories.
* Question and answer categories must remain together in the same column and on the same page.
* The patient’s name must not be printed on the survey.
* Response choices must be listed individually for each item. For example, when a series of items is asked that have the same answer categories (e.g., Never, Sometimes, Usually, or Always), the answer categories **must be repeated with every item**. A matrix format which simply lists the answer categories across the top of the page and the items down the side of the page is not allowed.
* The survey vendor’s or mail processing subcontractor’s return address must be added to the bottom of the last page to ensure the survey is returned to the correct address in case the patient misplaces the enclosed return envelope.
* All surveys will be printed as booklets in black and white. However, survey vendors may opt to print the surveys in black and white with a highlight color.
* All surveys must be printed using a minimum font size equal to or larger than Arial 11 point
* There is no OMB Control Number to print on the cover of the survey. PCF PECS is OMB-exempt.
* Optional: Survey vendors may consider the following formatting recommendations so that surveys are easy to read, thus improving the chances of receiving a completed survey:
  + Use ovals instead of boxes for response items
  + Use two-column format
  + 12-point font size
  + Wide margins (at least ¾ inches) so that the survey has sufficient white space to enhance readability
  + Survey vendors have the option to provide their toll-free number on the last page of the survey, with the survey vendor’s or mail processing subcontractor’s return address, in case the beneficiary has questions about the survey and misplaced the cover letter

Note: It is permissible to place a code at the bottom of the mail survey to assist the survey vendor’s customer service staff in identifying the survey type.

Note: Survey vendors may use pre-codes placed to the left of the response options as subscript or superscript. Pre-codes should not be displayed on 0–10 response scales.

Note: Each survey vendor must submit PDF copies of their English-language and Spanish-language PCF PECS mail survey questionnaires as part of the vendor oversight process. Please see **Chapter 10, Oversight,** for more information.

**Envelopes:**

* Outgoing envelopes are available for download at the [PCF PECS web portal](https://pcfpecs.org) Exit icon.
* Outgoing envelopes must include the PCF PECS image and the survey vendor’s return address. The survey vendor’s logo is optional. If there is a mail processing subcontractor’s return address that should be used instead of the survey vendor’s.
* Survey vendors may not alter the PCF PECS image.
* Each outgoing package must include a pre-paid Business Reply Envelope (BRE) addressed to the survey vendor or to the mail processing subcontractor.
* Special outgoing envelopes for patients living in residential care facilities are also available for download on the [PCF PECS web portal](https://pcfpecs.org) Exit icon and must be printed with the following messages on the front:

Please ensure the resident or their loved one sees this survey about visits to their primary care provider.

If the resident no longer resides at this location, please let us know by returning this mailing to sender or calling the Help Desk toll-free at [insert survey vendor’s Toll Free Number].

#### Mailing

Survey vendors must follow these procedures when mailing out the first questionnaire:

* Perform address validation to check for missing or incorrect information.
* Survey vendors must retain a record of attempts to acquire missing address data. All materials related to survey administration are subject to review by CMS and their contractor, RTI.
* Mail materials must be addressed to the sampled patient using the address given in the sample file (unless the survey vendor obtains an updated mailing address).
* To ensure delivery in a timely manner and to maximize response rates, survey vendors are strongly encouraged to mail the questionnaire package using first class postage or indicia.

Figure 5-4  
Second Questionnaire Timing

### Reminder Postcard

The reminder postcard (***Appendix E***) is sent to all sampled patients. It serves as a Thank You note to patients who have completed their survey and reminds all other patients to complete their survey or contact the Help Desk with any questions.

#### Timing

As shown in ***Exhibit 5-1***, the reminder postcard is mailed one week after Questionnaire 1 is mailed. It should not be mailed sooner or it could arrive before the questionnaire arrives.

Figure 5-5  
Reminder Postcard Timing

#### Formatting and Printing

The reminder postcard can be downloaded from the [PCF PECS web portal](https://pcfpecs.org) Exit icon.

The formatting and printing requirements of the teaser postcard apply to the reminder postcard.

### Questionnaire Mailout #2: Letter, Questionnaire, Envelopes, and Envelope for Sampling Members Residing in Residential Care Facilities

#### Timing

The second questionnaire mailing (***Appendix F***) is mailed approximately six weeks after receipt of the questionnaire mailout #1 is mailed. Vendors must not send the 2nd mailout to:

1. Patients who returned a questionnaire indicating refusal or ineligibility
2. Patients who returned a questionnaire that has some questions answered and passes the threshold of partial complete
3. Patients who contacted the Help Desk and indicated their refusal or ineligibility.

Vendors should generate the patient list for the 2nd questionnaire sample file as close as possible to the 2nd questionnaire mailout date, to allow time to for these four groups of patients to accumulate. The list should not be prepared farther in advance than two weeks.

Reducing potential patient confusion and burden from unnecessary mailouts is very important for PCF PECS.

#### Required and Optional Formatting and Printing Guidelines

**Letter:**

The survey vendor is expected to download the letter from the [PCF PECS web portal](https://pcfpecs.org) Exit icon. The text for the second letter is different from the text for the first letter. The text for the second letter must be used, as it explains that the patient is receiving a second copy of the questionnaire which they can disregard if they have already returned their first questionnaire. When sending the letter with the 2nd questionnaire, survey vendors should use the same general formatting that they used for the 1st letter. Required and optional formatting guidelines are described in ***Section 5.5.2.2, Required and Optional Formatting and Printing Guidelines***.

**Questionnaire:**

The survey vendor is expected to download the survey from the [PCF PECS web portal](https://pcfpecs.org) Exit icon. The questionnaires for the first and second mailouts are identical. All required and optional formatting questionnaire guidelines detailed for the Questionnaire Mailout #1 in ***Section 5.5.2.2, Required and Optional Formatting and Printing Guidelines*** apply to the questionnaire sent in Questionnaire Mailout #2.

**Envelopes:**

The survey vendor is expected to copy the envelope from the [PCF PECS web portal](https://pcfpecs.org) Exit icon. The envelope for the survey for the second mailout differs from the cover page of the survey for the first mailout and must be used. It has a note acknowledging this a second copy of the questionnaire patients previously received and that patients can disregard it if they already completed their questionnaire. **This note is very important for patients to see on the envelope.**

Apart from that, all required and optional formatting questionnaire guidelines detailed for the Questionnaire Mailout #1 in ***Section 5.5.2.2, Required and Optional Formatting and Printing Guidelines*** apply to the questionnaire sent in Questionnaire Mailout #2. The special envelope messages for patients in residential care facilities also apply.

#### Mailing

Survey vendors must follow these procedures on all mailouts:

* Perform address validation to check for missing or incorrect information.
* Survey vendors must retain a record of attempts to acquire missing address data. All materials related to survey administration are subject to review by CMS and their contractor, RTI.
* Mail materials must be addressed to the sampled patient using the address given in the sample file (unless the survey vendor obtains an updated mailing address.
* To ensure delivery in a timely manner and to maximize response rates, survey vendors are strongly encouraged to mail the questionnaire package using first class postage or indicia.

### Incentives

CMS does not allow practice sites or survey vendors to offer incentives of any kind to patients or proxy respondents.

### Instructions About Adding Practice-Specific Questions

Should practice sites wish to add practice-specific questions on their PCF PECS questionnaire, the following guidelines must be followed:

* The maximum number of practice-specific questions that can be added is 10.
* All added questions must be placed after the final PCF question (question #55, help with non-medical needs) and before the About You section.
* The practice-specific questions cannot be used with the intention of marketing or promoting services by the practice or related organizations.
* The practice-specific questions cannot ask patients why they responded a certain way to a PCF PECS question.
* If the practice-specific question asks patients to write comments in their own words, the wording of the question must make it clear that their comments will be shared with the staff at the practice. For example, “Is there anything else about your experience that you would like us to share with the practice named on the cover of the questionnaire,” would be appropriate. Survey vendors must have a process of reviewing data from comment questions and redacting personally identifiable information before data delivery/report delivery to the practice site.
* Survey vendors and/or practice sites are responsible for translating the practice-specific questions into Spanish.
* Survey vendors must not include responses to the practice-specific questions on the PCF PECS data files that will be uploaded to the [PCF PECS web portal](https://pcfpecs.org) Exit icon. Nevertheless, the patient confidentiality safeguards survey vendors must uphold in reporting PCF PECS data to their practices (described in ***Section 8.4, Survey Vendor Analysis and Reporting of PCF PECS Data***) apply to data from these additional practice-specific questions as well. Note that:
  + Survey vendors may not append identifying information from the sample file to data from practice-specific questions. This applies to both closed ended and comment questions.
  + All other rules in ***Section 8.4*** apply as well.

Survey vendors do not need to obtain CMS’ approval of the practice-specific added questions before adding them to the survey. *However, CMS recommends avoiding sensitive questions or lengthy additions because of the potential to reduce expected response rates.*

### Perform Quality Control Measures on Mailings

Required quality control measures

* As stated in ***Section 4.6.4***, survey vendors must employ an address update and standardization service on each sample patients’ mailing address that is included in the sample file provided by CMS. A commercial address update service that fixes address formatting errors (promoting timely delivery) and accesses Address Forwarding requests, such as NCOA or the U.S. Postal Service Zip+4 software, are recommended. Survey vendors are permitted to ask the client practice sites to provide updated address information for all patients they treated during the sampling window, if the vendor has an appropriate agreement with the practice sites. Survey vendors cannot, however, give a list of the sampled patients to the practices to request this information.
* Survey vendors must prepare and maintain written documentation that all staff members involved with the mail survey implementation, including support staff and subcontractors, were properly trained on the survey specifications and protocols.
* Check a minimum of 10 percent of all printed materials (questionnaires, postcards, letters) to ensure the quality of the printing—that is, make sure that there is no smearing, misaligned pages, missing/duplicate pages, stray marks on pages, or bleed-throughs (which can impact or cause problems when scanning the data from completed questionnaires).
* Check a sample of cases for each practice to make sure that the name and address printed on letters (and the outside of the envelope if window envelopes are not used) matches the name and address included in the sample file the vendor downloaded from the [PCF PECS web portal](https://pcfpecs.org) Exit icon.
* Check a minimum of 10 percent of all outgoing questionnaire packages to ensure that all package contents are included and that the same unique SID number appears on both the cover letter and the questionnaire.
* Survey vendors must check to make sure that the number of questionnaire packages to be mailed matches the number of sampled cases.
* All staff involved in the mail phase, including support staff, must be thoroughly trained on the survey specifications, protocols and equipment. This includes contents of the questionnaire package, requirements for the visual review and 10 percent quality checks of the packages. A copy of relevant chapters of this manual should be made available to all staff as needed.

Recommended quality control measures:

* Survey vendors are advised to “seed” each mailing (postcards and questionnaires). That is, include the name and address of designated survey vendor staff member in each mailing file to have the survey materials sent to that staff member. Once the survey materials are received, the vendor’s staff should review and assess the completeness of the questionnaire package and timeliness of package delivery. Note: do not include the seeded names in the telephone non-response follow-up or data submission files.

### Conduct Data Receipt of Questionnaires Returned by Mail

The following guidelines are provided for receiving and tracking returned questionnaires. Survey vendors can choose whether to enter data via an optical scanning program or manually key data into a data entry program. Requirements for data receipt for each type of data entry system are provided below, in ***Section 5.5.9, Process Data from Questionnaires Returned by Mail***.

Data receipt requirements:

* The date the questionnaire was received must be entered into the data record created for each case.
* Questionnaires received must be logged into the tracking system in a timely manner to ensure that they are taken out of the cases being rolled over to the next data collection activity. Specifically, there must be no backlog of returned questionnaires when the sample file for the 2nd questionnaire mailing is created, or the sample file for the telephone non-response mailing is created.
* Once telephone follow-up begins, questionnaires that are returned must be processed in the tracking system in a timely manner. Patients given any final status code (including complete, refusal or ineligible) should be removed as soon as possible (within 24-48 hours) from the telephone follow-up system to avoid calling patients who have already responded.
* Questionnaires must be visually reviewed prior to scanning for notes/comments. Notes can indicate whether the patient is deceased, for example, or otherwise ineligible. Survey vendors must assign the proper status code (see ***Exhibit 5-2, Final Status Codes***).
* Patients who were already deceased **when their survey was received at their address** are ineligible. A proxy is not allowed for a deceased patient. If a mail survey is received by the survey vendor as completed but the survey vendor learns later that the sample patient is deceased (via a letter or telephone call received after the completed mail survey is received), the survey vendor should process and include the data if there is no indication that the survey was completed by someone else (based on the responses to Qs. 63–64) and the case meets the completeness criteria.
* In the event two surveys are received from the same patient (either two mail questionnaires or one mail questionnaire and one telephone interview), retain the survey with the more complete data. If both surveys are equally complete, the survey vendor should use the first one received.
* Survey vendors must properly and promptly dispose of all questionnaires which arrive after the data collection cutoff; they should not be stored for 3 years like the rest of the questionnaires. Their data should not be captured or reported to CMS or practices. The vendor must assign the appropriate final non-complete status code to the case.
* A PCF PECS final status code (***Exhibit 5-2***) must be assigned to each case.

Exhibit 5-2  
PCF PECS Final Status Codes

| Code | Description |
| --- | --- |
| 110 | **Completed Mail Questionnaire** For this code to be assigned, the respondent must have met the criteria described in “Definition of a Fully Completed Questionnaire” see ***Section 6.2.1, Definition of Complete and Partial Complete Surveys***. Note patients may meet these criteria even if their answer to Q1 is “No” and/or their answer to Q3 is “None.” |
| 120 | **Completed Phone Interview** For this code to be assigned, the respondent must have met the criteria for described in “Definition of a Fully Completed Questionnaire” see ***Section 6.2.1, Definition of Complete and Partial Complete Surveys***. |
| 130 | **Partially Completed Mail Questionnaire** For this code to be assigned, the respondent must have met the criteria for described in “Definition of a Partially Completed Questionnaire” see ***Section 6.2.1, Definition of Complete and Partial Complete Surveys***). Note patients may meet these criteria even if their answer to Q1 is “No” and/or their answer to Q3 is “None.” |
| 140 | **Partially Completed Phone Interview** For this code to be assigned, the respondent must have met the criteria for described in “Definition of a Partially Completed Questionnaire” see ***Section 6.2.1, Definition of Complete and Partial Complete Surveys***. |
| 150 | **Ineligible: Deceased** Assign this code if the sample patient is reported as deceased at the time of the survey. |
| 160 | **Ineligible: Does Not Meet Eligibility Criteria** Assign this code to either mail or telephone survey cases if it is determined during the data collection period that the sample patient does not meet the eligibility criteria for being included in the survey.   * The sample patient is under age 18. * The sample patient resides in a nursing home or other skilled nursing facility or other long-term facility, such as a jail or prison. |
| 170 | **Language Barrier** Assign this code to sample patients who do not speak English or Spanish and do not have a proxy who can translate the survey into the patient’s language. |
| 180 | **Ineligible: Mentally or Physically Incapacitated** Assign this code if it is determined that the sample patient is unable to complete the survey because he or she is mentally or physically incapable and there is not a helper or a proxy who can help the patient complete the survey. |
| 190 | **Ineligible: Did Not Receive Care at Practice** Assign this code to sampled patients who report in Q1 that they did not receive care from this provider’s office in the last 6 months, or who reported in Q3 that they had 0 visits in the last 6 months. Do not use this code if the sampled case otherwise met the partially complete or fully complete criteria. |
| 200 | **Excluded from Survey** Sampled patient was determined to be ineligible for survey after sampling but before data collection was initiated. |
| 210 | **Incomplete** Assign this code if the sample patient responds to some questions but not enough to meet the either completeness criteria. Appropriate for mail surveys that are mostly blank and telephone breakoffs. |
| 220 | **Refusal** Assign this code if the sample patient indicates either in writing or verbally that he or she does not wish to participate in the survey. |
| 230 | **Hostile Refusal** Assign this code to hostile refusals. Includes any sampled cases on the survey vendor’s Do Not Contact list. |
| 240 | **Wrong, Disconnected, or No Telephone Number** This code should be assigned if it is determined that the telephone number the survey vendor has for the sample patient is bad (disconnected, does not belong to the sample patient) and no new telephone number is available. This can also be assigned if no phone number was provided for the sample member. |
| 250 | **No Response After Maximum Attempts** This code should be assigned when the contact information for the sample patient is assumed to be viable, but the sample patient does not respond to the survey/cannot be reached during the data collection period. |
| 260 | **No Response To Mail Survey—RCF Patients** This code should be assigned to patients who are flagged as residential care facility patients and for whom no other final code (ineligible, complete, refusal) has been recorded. |
| 270 | **Pending (Use only in Interim Data Submissions)** This code should be assigned to patients who have not yet had all contact attempts and may still complete between interim data submission(s) and final data submission. |

### Process Data from Questionnaires Returned by Mail

Vendors may process data using an optical scanning process or data entry. The following program requirements and quality control measures are required for both.

Requirements for the program:

* The scanning program or data entry program, whichever is used, must not permit out-of-range or invalid responses.
* The program must either alert staff to any duplicate questionnaires entered, or prevent duplicate questionnaires from being entered.
* If a response mark falls between two answer choices but is clearly closer to one answer choice than to another, the scanning or data entry process, whichever is used, should select the response that is closest to the marked response.
* If two responses are checked for the same question, the scanning or data entry process should select the one that appears darkest. If it is not possible to make a determination, leave the response blank and code as “missing” rather than guessing.
* If a mark is between two answer choices but is not clearly closer to one answer choice, the scanning or data entry process should code as “missing.”
* If a response is missing, the scanning or data entry process should leave the response blank and code as “missing.”
* Although they can be scanned or data entered, survey vendors must not include responses to any practice-specific questions on the data files submitted to CMS.
* Detailed specifications and decision rules for coding are found in ***Chapter 6, Data Coding and Preparation.***

Mandatory quality control measures for optical scanning:

* A sample of questionnaires (minimum of 10 percent) must be rescanned and compared with the original scanned image of the questionnaire as a quality control measure. Any discrepancies must be reconciled by a supervisor.
* The survey responses marked in a sample of questionnaires (minimum of 10 percent) must be compared to the entries scanned for that case to make sure that the scanning program scanned the marked responses correctly.

Mandatory quality control measures for data entry:

* Survey vendors must have a process in place to validate data entered in order to ensure that data entered accurately capture the responses on the original survey. A different staff member should re-key minimum of 10 percent of the surveys, and the results of the two keyers should be compared. Any differences should be reconciled. As necessary, keyers must be trained to improve keying accuracy.

### Process White Mail

Patients and family members occasionally send notes or other items (e.g., literature, other surveys, medical bills) along with or instead of their questionnaires. The items sent most often are notes explaining the patient is deceased, refuses, or describing their experience with this provider.

Survey vendors should update the patient’s status code based on information received, and must store the information received for documentation purposes. It should be stored for three years.

In the unlikely event the patient has sent important information, such as a medical bill with a check, survey vendors must mail it back to the patient.

White mail should not be sent to the PCF Practice site.

### Store Data

Survey vendors must store returned paper surveys or scanned images of paper surveys in a secure and environmentally controlled location for a minimum of three years. This does not apply to surveys received after the cutoff date for returned mail surveys. Do not scan, or key-enter, or store these surveys.

### Conduct Training for Staff in Mail Portion of Survey

All staff involved in the mailout and data processing phase of survey implementation, including support staff and subcontractor staff, must be thoroughly trained on the survey specifications and protocols. A copy of relevant chapters of this manual should be made available to all staff as needed. Staff involved in questionnaire assembly and mailout, data receipt, and data entry must be trained on:

* Use of relevant equipment and software (case management systems for entering questionnaire receipts, scanning equipment, data entry programs);
* PCF PECS protocols specific to their role (for example, contents of questionnaire package, requirements for visually reviewing questionnaires prior to scanning for notes/comments, how to document or enter returned questionnaires into the tracking system);
* Decision rules and coding guidelines for returned questionnaires (see ***Section 6.3, Data Preparation***); and
* Proper handling of hardcopy and electronic data, including data storage requirements (see ***Section 9.3, Safeguarding Patient Data***).

If any of these mailout or data staff are also involved in providing patient support via the toll-free Help Desk, they should also be trained on the accurate responses to FAQs, how to look up information about the caller, and the rights of survey respondents. They should receive training on appropriate sections of this manual, which include ***Section 5.6.2, Operate the Inbound Telephone and Email Help Desk,*** and Waiting Room FAQs in ***Appendix N***.

## Conduct Telephone Follow-up Protocol

This section describes the protocol that survey vendors must follow for the telephone follow-up phase of the mixed-mode survey administration of the PCF PECS. This phase requires the use of computer assisted telephone interviewing (CATI) system. Phone interviews may not be completed manually using paper/pencil surveys and then key-entered after the interview.

As shown in ***Exhibit 5-1, PCF PECS Administration Schedule***, survey vendors must begin the telephone-follow up phase of the survey four weeks after Questionnaire 2 is mailed. Survey vendors are not allowed to administer the phone survey before the specified timeline unless a patient calls the Help Desk and requests to complete the survey by phone.

### Use a Batch Service to Obtain Sample Member Phone Numbers When Not Provided

CMS will provide phone numbers, where feasible, as part of the sample. The source of the sample files are the records maintained by PCF Practice Sites. Survey vendors must attempt to obtain phone numbers for the subset of patients in the sample for which a phone number was not provided. Survey vendors shall use a secondary source, such as phone matching services or software, directory assistance, and other phone directory applications. Vendors should take steps to ensure the telephone numbers provided by the service are associated with the patient in the sample file.

In the event of many blank or invalid patient telephone numbers on the sample file, survey vendors may want to consider if the practice site’s more recent telephone records of patients have improved since the practice site gave the patient information to CMS. If there is reason to expect a reduction in blank or invalid telephone numbers, or an increase in telephone number accuracy, the survey vendor can request the practice site provide them with a file with all their patients with appointments since January 1 of the performance year. Vendors can use information from this practice-supplied file to update the contact information on the CMS-supplied sample file. An appropriate data use agreement between the practice site and the vendor must exist before transfer of this patient information. Vendors may not give information to PCF Practice site identifying which patients are in the sample.

### Operate the Inbound Telephone and Email Help Desk

Survey vendors must operate a Help Desk to answer questions from sampled patients or family members who call or email with questions about the PCF PECS. The Help Desk must be operational on the first day after the teaser postcards are mailed. After business hours, and when all Help Desk personnel are busy on other calls, the number must be serviced by a voicemail system. Survey vendors must check voicemail messages hourly during business and each morning, and return them as soon as possible, at the most within 1 business day. These timelines must be mentioned in the voicemail greeting. Consistent with patient-facing communications, the greeting on the voicemail system should not mention PCF or Primary Care First, as patients generally are unaware their practice is in a program called PCF.

Experience from CPC+ suggests that the volume of calls received is approximately 1.75 percent of the patient sample. Volume can be higher or lower for individual practice sites. It is also higher immediately after mailings and during the telephone survey phase when patients are calling back after receiving calls from interviewers. Sufficient Help Desk personnel, including Spanish-speaking personnel, should be trained and staffed on Help Desk commensurate with the expected volume. All Help Desk personnel should be familiar with ***Frequently Asked Questions from Sample Members, for Use by Telephone Interviewing/Inbound Help Desk (Appendix I)*** so they can answer questions with ease and confidence.

The Help Desk email address should be checked at least twice a day. Experienced Help Desk personnel should respond to all email inquiries within 1 business day, if not sooner. Survey vendors will need to describe their process for email responses in their QAPs.

During months of the year when the inbound Help Desk is not operational, such as before the teaser postcard is mailed or after the survey period ends for that performance year, the survey vendor must indicate the survey status to people who call the Help Desk and/or send email. The “closed” greeting should:

* thank the caller for their interest in the survey;
* state that the survey has ended;
* give the date the survey will resume for the coming year if appropriate; and,
* invite them to leave a voicemail message should they have questions

An automatic-reply email message should similarly convey these points, and invite people who have questions to leave a voicemail message.

Experience from CPC+ shows the volume of people who contact Help Desk before the survey opens or after it closes is very low. Nevertheless, survey vendors are responsible for checking voicemail messages and answering caller’s questions during this time. If survey vendors have any questions, they should obtain guidance from Technical Support by emailing [pcfpecs@rti.org](mailto:pcfpecs@rti.org) or by calling **833-997-2715**.

Figure 5-6  
Help Desk Timing

#### Use the Provider Name Lookup

Experience from the predecessor model CPC+ has shown that a common concern among people when they call the Help Desk is lack of recognition of the practice name and address on their survey as a place where they received care. Frequently, this lack of recognition is due to the fact that people **remember the name of the provider, rather than the name of the practice.** Help Desk and telephone interviewing personnel must use the names of the medical staff supplied in the sample file to help patients (or their proxies/helpers) recall the name of a provider who cared for them and explain that this provider is located at the practice. The following is an example of appropriate language which can be used for this purpose (also included in the telephone script, ***Appendices G*** and ***H***):

Thanks for explaining that. Sometimes primary care practices use an official name that is unfamiliar to patients. (PAUSE). Which doctors or other providers did you see in the last 6 months? I can look them up on my list of medical staff at this practice. (IF PATIENT WANTS YOU TO READ THE NAMES, YOU CAN DO THAT INSTEAD)

Note that the medical staff provided on the sample file include all clinicians licensed to see patients in appointments, and is inclusive of MDs, DOs, Nurse Practitioners, Physician Assistants, and Clinical Nurse Specialists (CNS). The number of medical staff at each practice site varies widely.

#### Notify Practice Sites of Contact Information for Inbound Help Desk

As explained in ***Section 3.4.4, Communicate with Patients About the Survey,*** CMS provides practices with a Poster and Waiting Room FAQs (***Appendices M, N,*** respectively) and requires them to display these beginning in March of each year, which corresponds to 6 months prior to survey start. These documents display the telephone number of the survey vendor’s Help Desk. **Survey vendors must notify their client practice sites of the telephone number of their Help Desk as soon as the number is operational.** Practices will write/print the number onto the poster and FAQs.

Note: the requirement on the practice’s part to place the telephone number on the posters as soon as it is available does not alter the timeline for Help Desk operations shown in **Exhibit 5-1**. CMS does not require the Help Desk to operate before the teaser postcard is sent.

### Use a Phone Interviewing System

CATI has been shown to facilitate interviews, decrease the time needed to collect and edit data, reduce interviewer error, improve data quality (by customizing the flow of the survey based on the answers given as well as information already known about the participant), and remove the need for data entry after data collection. CATI requires a phone interviewer to follow a script programmed into a software application. (The telephone script for PCF PECS is provided in ***Appendices G–H***.) When contact is made with a respondent, the interviewer reads the survey items that appear on the computer screen and records the respondent’s answers directly into the computer.

Survey vendors may use the CATI system of their choice, but the system must:

* be linked electronically to the survey management system to allow tracking of the sampled patient through the survey administration process;
* save data from partially-completed interviews and allow interviewers and respondents to later resume the partial interview beginning with the first unanswered question.
* ensure patients are called at different times of the day and across multiple days of the week;
* be linked to the calling system so that the number of calls made can be tracked, appointments set, and follow-up calls made at appropriate times; and,
* allow the appropriate pending and final disposition codes to be easily accessible for all cases.

Survey vendors are responsible for programming the script and specifications for CATI application, including programming that the CATI system appropriately follows the survey’s skip patterns. Survey vendors are also responsible for making sure there are adequate resources to complete the phone phase within the data collection protocol timeline.

Survey vendors CATI systems must support the following required functions on the PCF PECS telephone survey, described in ***Section 5.6.3, Use a Phone Interviewing System***.

Figure 5-7  
Telephone Follow-up Timing

#### Removal of Completed/Finalized Mail Surveys From the Telephone Survey

Survey vendors must use their survey management system to identify sampled patients who have returned their completed survey, are ineligible, or have refused the survey. This information can come through the mail survey receipt process or can come if the patient calls the Help Desk. These patients must be removed from the CATI calling lists promptly, as calling them unnecessarily is burdensome to the patient. CATI calling lists must be refreshed every 24–48 hours to remove all patient cases which are already complete or final.

#### Removal of Patients Living in Residential Care Facilities/Assisted Living

As described in ***Section 4.6.2, Identify Patients Residing in Facilities,*** survey vendors must flag patients on the sample file who live in residential care/assisted living. Such patients are eligible, however due to the challenges of surveying them they receive a different data collection protocol. They receive a slightly different outgoing envelope and are not included in the phone follow-up. When the telephone follow-up survey begins, survey vendors must follow a process to ensure such patients are not called.

Note: patients who reside in nursing homes/skilled nursing facilities are ineligible. If any are encountered the appropriate ineligible status code should be chosen.

#### Predictive or Automatic Dialers

Predictive or automatic dialers are permitted, as long as they are compliant with FTC and FCC regulations, and as long as respondents can easily interact with a live interviewer. For more information about FTC and FCC regulations, please visit [https://www.ftc.gov](https://www.ftc.gov/) and [https://www.fcc.gov](https://www.fcc.gov/).

#### Auto-dialing of Cell Phone Numbers

FCC regulations prohibit auto-dialing of cell phone numbers. Therefore, cell phone numbers need to be identified in advance to allow the vendor to treat cell phone numbers in a way that complies with FCC regulations. It is vendors’ responsibility to familiarize themselves with all applicable state and federal laws and abide by those accordingly in regard to calling cell phone numbers.

#### Outgoing Caller-ID

Survey vendors must set an outgoing caller-ID text on the calls generated from their telephone survey. The recommended text is “Patient Survey.” Survey vendors may not use the name of the practice, Centers for Medicare and Medicaid Services, Department of Health and Human Services, or any abbreviated version of these in their caller-ID text.

Many patients elect to use their phone to “call back” or “redial” the number that dialed them. Therefore, CMS recommends that the callback number pulsed out by the system leads to a telephone interviewer and/or Help Desk at the survey vendor.

#### Calling Times

Survey vendors must not place calls earlier than 9 AM respondent time on weekdays and 11 AM respondent time on weekends, and not later than 8 PM on weekdays and 7PM on weekends.

The time zone of the sampled patient must be determined from the patient’s state, or in some cases zip code, not their area code.

#### Take Measures to Prevent Calls From Being Filtered as Spam

When a large volume of calls in a short period of time originates from one phone number, phone companies and service providers can flag the calls as spam. The company or service provider can identify these calls for their subscribers as “Likely Spam” or block delivery of these calls to their subscribers.

Survey vendors must conduct tests prior to survey launch to determine whether PCF PECS calls are likely to be flagged as spam. If they are, the survey vendor must implement measure(s) to prevent this flagging, such as distributing the calls across different numbers of origination and not re-using numbers. Survey vendors will need to describe this in in their Quality Assurance Plan (for more information, see ***Chapter 10, Oversight)***.

#### Take Measures to Complete “Breakoff” Interviews

If a respondent ends the interview before completing all questions, the survey vendor should attempt to recontact the respondent to obtain data for the questions in the un-administered portion of the survey. The one exception to this is if the respondent indicated to the interviewer that they no longer wanted to participate.

The CATI system must support a systematic way of identifying these “breakoff” interviews so interviewers can re-call respondents in a timely manner. CMS also requires that the CATI systems of PCF PECS survey vendors save data from partially-completed interviews and allow interviewers and respondents resume the partial interview beginning at the first unanswered question (as described in ***Section 5.6.3, Use a Phone Interviewing System***), above.

### Make Required Attempts to Reach Patient

Survey vendors must attempt to reach every patient identified for phone follow-up. As explained above in ***Section 5.6.3.1, Removal of Completed/Finalized Mail Surveys From the Telephone Surveys,*** patients identified for phone follow-up are all sampled patients except those with complete surveys or whose status is refused or ineligible. Survey vendors must make a maximum of 6 telephone contact attempts for each patient identified for the telephone survey until the patient completes the interview, refuses to participate or is found ineligible. After six attempts by phone have been made, no further attempts are to be made.

A phone attempt is defined as an attempt to reach the respondent by phone at different times of day, on different days of the week, and during different weeks over the 28-day follow-up period. All call attempts cannot occur in a single week, but must occur over no fewer than two weeks in the 4-week phone follow-up period.

It is permitted to call the patient back one time after the sixth attempt if the patient or his/her proxy establishes a firm callback date and time.

A call is considered a phone attempt if it meets one of the following criteria:

* The phone must ring at least six times with no answer
* The interviewer reaches a member of the patient’s household and is told that the patient isn’t available to come to the phone. The interviewer will attempt to schedule a callback date/time and attempt to determine if the patient needs a helper or proxy to complete the interview.
* The interviewer reaches the patient but is asked to call back at a more convenient time
* The interviewer gets a busy signal during each of three consecutive phone dialings (if possible, the dialings must be made at approximately 20 minute intervals)
* The interviewer obtains an answering machine or privacy manager. The interviewer should leave a voicemail message on the 2nd and 4th dials (see ***Section 5.6.4.1 Voicemail Messages***).
* There is a message that the phone number has been disconnected or is out of service (see below “When to code numbers as ***“Permanently Out of Service).***”
* There is a fast busy signal (see below “When to code numbers as ***“Permanently Out of Service)***.”

Other requirements for attempting to contact patients:

* If an interviewer receives a new telephone number for the sampled patient, the 6 attempts should start over with the new phone number. A total of 6 call attempts must be made on the new phone number, if there is enough time left in the data collection period.
* If a sample patient is reached but is unable to speak with the telephone interviewer at that time, if he or she requests that a telephone interviewer call back at a different date/time (for either a callback or scheduled appointment), an effort must be made to recontact the respondent on that requested date/time.
* Survey vendors must maintain a call log that keeps track of the date and time phone calls were made for each sample patient and apply the appropriate final disposition code to the case. Ideally, this should be done within the CATI system.
* The use of incentives of any kind is not permitted.
* If a respondent begins but cannot complete the interview on the same call, the interviewer should resume the interview at the last unanswered question when the respondent is recontacted (this is a requirement of the CATI software, per ***Section 5.6.3.8, Take Measures to Complete “Breakoff” Interviews***).
* If a PCF PECS sample patient is on the survey vendor’s Do Not Contact List, based on a previous contact in another survey conducted by the survey vendor, or is a Hostile Refusal from the prior performance year of PCF PECS, the vendor should honor that patient’s request. Such cases should be coded as a refusal. As such, PCF PECS survey vendors must determine a way by which to designate and identify sample patients who permanently refuse to participate in the current survey period and all future PCF PECS periods. Vendors are encouraged to use their internal records to cross reference patients on the sample file with patients on the survey vendor’s Do not Contact List and PCF PEC hostile refusals from previous performance years. These sample patients should not be sent any survey materials (i.e., the prenotification letter, the questionnaire package), should not be contacted to complete the phone interview, and should instead be assigned a final disposition code of Refusal.

When to code numbers as Permanently Out of Service:

* If the interviewer receives a recorded message indicating the telephone number is “temporarily out of service,” the interviewer should redial the telephone number 3 to 5 days after the initial call was made. If the second call attempt again results in the same recorded message, the interviewer should call the telephone number a third time, 5 days after the second call attempt was made. If the third call attempt again results in the same recorded message, the vendor should apply the appropriate final disposition code to the case.
* If the interviewer gets a fast-busy signal, the interviewer should redial the telephone number immediately after receiving the fast busy signal. If the interviewer again receives the same fast busy signal, the interviewer should call the telephone number again on a different day of the week and at a different time of day than the initial calls. If the third call attempt again results in the same fast busy signal, the vendor should apply the appropriate final disposition code to the case.

#### Voicemail Messages

Voicemail messages should be left on the 2nd and 4th dials. CMS recommends the following voicemail messages:

2nd dial

Hello, my name is \*\*\* and I am trying to reach about the Patient Experience of Care Survey. This survey asks for your feedback on your experience of care with your primary care provider and we would like to hear from you. The survey is sponsored by the Department of Health and Human Services and you may remember receiving it in the mail. We have not heard from you and would like to complete the survey over the phone with you at your convenience. Please call us toll-free at 1-INSERT VENDOR’S TOLL-FREE NUMBER. Again, that’s 1-VENDOR’S TOLL-FREE NUMBER. Thank you so much.

4th dial

Hello, my name is \*\*\* and I am trying to reach about the Patient Experience of Care Survey, sponsored by the Department of Health and Human Services. Your feedback on your experience of care with your primary care provider is very important. The survey is ending soon, and we would really like to hear from you. Please call us toll-free at 1-INSERT VENDOR’S TOLL-FREE NUMBER. Again, that’s INSERT VENDOR’S TOLL-FREE NUMBER. Thank you so much.

### Utilize Only Approved FAQs and Interview Phone Script

Survey vendors must use the standardized telephone script, provided by CMS in English and Spanish in ***Appendices G*** and ***H***, when administering the survey by telephone. These scripts begin with an interviewer introduction, the informed consent process, and an as-needed procedure to follow if the respondent does not recognize the name of the practice. The process telephone interviewers follow in this regard mirrors the process followed by Help Desk personnel that is described in ***Section 5.6.2.1, Use the Provider Name Lookup.*** The text of the phone script was developed by CMS and must not be modified. Survey vendors are not permitted to translate the phone script into other languages. The CATI scripts are available for download at [the PCF PECS web portal](https://pcfpecs.org) Exit icon.

The PCF PECS telephone interview contains 64 questions. Questions 1 to 55 are considered the “core” PCF PECS questions and must be placed at the beginning of the interview. Questions 56 to 64 are the “About You” PCF PECS questions. If a practice has elected to add practice-specific questions to the survey, they must be administered either between the “core” and the “About You” section, or after the “About You” section.

Note: Each survey vendor must submit screenshots from the English-language and Spanish-language PCF PECS Phone Survey as part of the vendor oversight process. Please see **Section 10, Oversight,** for more information.

Telephone interviewers and help desk personnel must use the approved FAQs (***Appendix I***) when answering patient questions. Staff should be familiar with these questions and answers (and the FAQs should be posted in workstations) so they can respond to patients fluidly and confidently. The Help Desk and Telephone Interviewer FAQs (English and Spanish) should be downloaded from [the PCF PECS web portal](https://pcfpecs.org) Exit icon.

### Assign Status Codes after Every Call

As stated above in ***Section 5.6.3, Use a Phone Interviewing System***, one of the requirements of the phone interviewing system is to ensure status codes are easily accessible for all cases. The survey vendor must have a process such that telephone interviewers assign a status code after every call. Survey vendors should use their internal status codes, including those native to their system, to capture outcomes from calls. These internal codes should guide internal review and tracking. However, after the completion of data collection each sampled patient must be assigned a final survey status code from ***Exhibit 5-2***. Guidelines for this may be found in ***Section 6.4, Survey Status Codes.***

Survey vendors must include internal interim disposition codes with a crosswalk to final disposition codes in their Quality Assurance Plan deliverable.

### Utilize a Protocol for Distressed Sample Members/Respondents

A distressed respondent protocol provides assistance if the situation indicates that the respondent’s health and safety are in jeopardy. Best interviewing practices recommend having a protocol in place for handling distressed respondents. Survey vendors must develop a distressed respondent protocol, to be incorporated into all telephone interviewers and help desk training. Distressed respondent protocols balance respondents’ rights to confidentiality and privacy with guidance about when and how to help those needing assistance.

Each approved PCF PECS survey vendor must have procedures in place for handling distressed respondent situations and to follow those procedures. It is also important to note that respondents can be upset and distressed, without being in immediate danger. The PCF PECS Team cannot provide specific guidelines on how to evaluate or handle distressed respondents. However, survey vendors are urged to consult with their organization’s Committee for the Protection of Human Subjects IRB for guidance. In addition, professional associations for researchers, such as the American Association for Public Opinion Research (AAPOR), might be able to provide guidance regarding this issue. The following is an excerpt from AAPOR’s website that lists resources for the protection of human subjects. More information about the protection of human subjects is available at AAPOR’s website at <https://www.aapor.org> Exit icon.[[1]](#footnote-2)

* The Belmont Report (guidelines and recommendations that gave rise to current federal regulations)
* Federal Regulations Regarding Protection of Human Research Subjects (45 CFR 46) (also known as the Common Rule)
* Federal OHRP
* NIH Human Participant Investigator Training (although the site appears to be for cancer researchers, it is the site for the general investigator training used by many institutions)
* University of Minnesota Web-Based Instruction on Informed Consent

### Train Telephone Interviewers on All Telephone Follow-Up Protocols

Interviewer training is essential to ensure that interviewers follow the protocols and procedures and that survey data are collected accurately and efficiently. Properly trained interviewers are thoroughly familiar with the phone survey protocol and procedures, skilled in general interviewing techniques including enlisting cooperation and refusal avoidance.

Survey vendors must provide training for all telephone interviewing and customer support staff prior to beginning telephone survey data collection activities. If the survey vendor subcontracts with another firm to conduct phone interviewers, the survey vendor is responsible for attending/participating in the subcontractor’s interviewer training to make sure the subcontractor complies with the protocols, procedures, and telephone interviewer guidelines (***Appendix J***) established for the PCF PEC Survey.

Telephone interviewer and Help Desk staff training must include training interviewers to:

* Establish rapport with the respondent;
* Effectively communicate the content and purpose of the interview to sample patients;
* Administer the interview in a standardized format, which includes reading the questions as they are worded, not providing the respondent with additional information that is not scripted, maintaining a professional manner, and adhering to all quality control standards;
* Use effective neutral probing techniques (see ***Appendix J***);
* Use the list of frequently asked questions by sample patients and suggested answers to those questions (see ***Appendix I***) so that they can answer questions with accuracy.

Survey vendors should also provide telephone survey supervisors with an understanding of effective quality control procedures to monitor and supervise interviewers.

Survey vendors must conduct an interviewer certification process—oral, written, or both—for each interviewer and Help Desk personnel prior to permitting the interviewer or staff member to make or take calls on the PCF PECS. The certification should be designed to assess the staff members’ level of knowledge and comfort with the PCF PECS Questionnaire and ability to respond to sample patients’ questions about the survey. Documentation of training and certification of all telephone interviewers and Help Desk staff and outcomes will be subject to review by CMS.

### Conduct Phone Monitoring and Oversight

Required oversight measures:

* Survey vendors must prepare and maintain written documentation that all telephone interviewing and Help Desk staff members have been properly trained prior to the beginning of telephone data collection. Copies of interviewer certification exam scores must be retained as well. Documentation must be maintained for any retraining required and will be subject to review during oversight visits.
* Phone monitoring program: Phone interviewers must be adequately supervised and monitored throughout the phone data collection period to ensure telephone interviewers follow established protocols and procedures. Each survey vendor must put into place a phone monitoring and evaluation program during the phone component of the data collection protocol.

The monitoring and evaluation program must include, but is not limited to, the following oversight activities:

* + Survey vendors must randomly monitor a minimum of 10 percent of all interviews through silent monitoring of interviewers using the electronic phone interviewing system software or an alternative system. This monitoring must include attempts as well as completed interviews, and be conducted across all interviewers, times of the day, and days of the week.
  + Survey vendors utilizing a subcontractor must periodically conduct silent monitoring of the subcontractor’s interviewers across all times of day and days of the week, give the subcontractor feedback regarding interviewer performance, and make sure the subcontractor’s interviewers correct any areas that need improvement
  + If a survey vendor uses a subcontractor for phone interviewing, the subcontractor and survey vendor combined must silently monitor a minimum of 10 percent of all interviews
  + Interviewers who consistently fail to follow the phone script verbatim, fail to employ proper probes, fail to remain objective and courteous, or who are difficult to understand or have difficulty in using the computer, must be identified and retrained or, if necessary, replaced.

There are federal and state laws and regulations relating to the monitoring/recording of telephone calls. In certain states, consent must be obtained from **every party** or conversation if it involves more than two people (“two-party consent”). When calling sample patients who reside in these states, survey vendors must not begin either monitoring or recording the telephone calls until *after* the interviewer has read the following statement: “This call may be monitored or recorded for quality improvement purposes.”[[2]](#footnote-3) All survey vendors must identify and adhere to all federal and state laws and regulations in those states in which they will be administering the PCF PECS.

* Survey vendors must establish and communicate clear telephone interviewing quality control guidelines for their staff to follow. These guidelines must be used to conduct the monitoring and feedback process and must include clear explanations of the consequences of not following protocols, including actions such as removal from the project or termination of employment.

Recommended oversight measures:

* Supervisory staff monitoring telephone interviewers should use the CATI system to observe the interviewer conducting the interview while listening to the audio of the call at the same time.
* Monitoring staff or supervisors should provide performance feedback to interviewers as soon as possible after the monitoring session has been completed.
* Interviewers should be given the opportunity to correct deficiencies in their administration through additional practice or retraining; however, interviewers who receive consistently poor monitoring scores should be removed from the project.
* We recommend that survey vendors conduct regular quality control meetings with telephone interviewers and Help Desk staff to obtain feedback on issues related to telephone survey administration or handling inbound calls.

## Exceptions Request Procedure

To request an exception to the PCF PECS protocols, a survey vendor must access and submit an Exceptions Request Form via the [PCF PECS web portal](https://pcfpecs.org) Exit icon. The vendor’s request is then forwarded to CMS, through their contractor, RTI. The Exceptions Request Form will allow the survey vendor to request a planned deviation from the standard PCF PEC Survey protocols. The Exceptions Request Form allows a survey vendor to include multiple PCF practice sites for which it collects data, as necessary. Specific instructions on how to complete the form are located on the form. The Exceptions Request Form is shown in ***Appendix K***.

Survey vendors should be aware that the CMS will not grant any requests to use a mode of data collection that is different from the mail with telephone follow-up, including Internet or web survey, and interactive voice recognition data collection modes.

## Discrepancy Report Procedure

To notify CMS of an unplanned deviation from the PCF PECS protocols, a survey vendor must access and submit a Discrepancy Notification Report via the [PCF PECS web portal](https://pcfpecs.org) Exit icon. The survey vendor must submit the report ***within 24 hours after the discovery of the discrepancy.*** Instructions on how to complete the Discrepancy Notification Report are located on the online form itself. The Discrepancy Notification Report is shown in ***Appendix L***.

Examples of instances requiring a Discrepancy Notification Report include the following:

* The survey vendor is unable to mail the teaser postcard within 14 days after downloading the sample file;
* A questionnaire package was not mailed to all sample patients;
* Patients in residential care facilities were called by telephone interviewers;
* A variable was incorrectly coded and submitted on the XML file.

Report Review Process:

CMS, through its contractor RTI, will review Discrepancy Notification Reports and evaluate the impact of the discrepancy on the scored data of the affected practices. Some discrepancies may have no impact on scores, such as miscoding of a variable in the XML file that is not used in scoring. Other discrepancies can have profound implications, such as if the 2nd questionnaire package were mailed late for all patients, as this would impact response rate. Depending on the impact, a footnote may be added to the affected practices’ scored data. The PCF PECS Team will notify the survey vendor about any required additional information needed to either document or correct the discrepancy.

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# Data Coding and Preparation

## Overview

The PCF PEC Survey guidelines for data coding have been developed to address situations in which survey responses are ambiguous, missing, or provided incorrectly. The guidelines for data preparations ensure a consistent approach across vendors with respect to categorizing the status of all sample members and the submission of PCF PECS data. Survey vendors must use the following guidelines to ensure valid and consistent coding of these situations.

## Data Coding Guidelines

### Coding When There is Ambiguity in Which Response is Marked

To ensure uniformity in data coding of mail surveys, survey vendors must use the following decision rules to resolve common ambiguous situations when scanning or key-entering mail surveys.

* If a mark falls between two response options but is obviously closer to one than the other, then select the choice to which the mark is closest.
* If a mark falls equidistant between two response options, then code the value of the item as “M”.
* If a value is missing, code as “M”. Survey vendors **must not impute** a response.
* When more than one response option is marked but the respondent has made their intent clear, such as by adding a note, arrowing or circling to the correct response, or striking out an old response, survey vendors should code the survey with the respondent’s **clearly intended** response. If the respondent’s intent is not clear, code the value as “M.”
  + **Exception:**
* Questions 62 and 64 have the instructions to “mark one or more” (for example, items on race and help received on the survey) and may have multiple responses. For these items, enter all responses that the respondent selected.

### Coding Questions That are Not Answered

Mail:

* Report all answers as marked by the respondent, even if the respondent does not correctly follow mail survey skip patterns.
* If a screener item is left blank, code it as “M”.
* Survey vendors **must not “clean”** **or correct skip pattern** errors on surveys. All answers marked by the respondent should be submitted.
  + Survey item data from gated questions where the screener was skipped, or where the screener was answered in such a way that the patient screened out, **are counted** as a response when considering if the patient has answered any scoreable items. See ***Section 6.3.1, Definition of Complete and Partial Complete Surveys***.
* Gated items inappropriately skipped should be coded as “M” as well.
* Gated items appropriately skipped should be coded as “88” which has the meaning Not Applicable.
* Although the respondent may write “Don’t Know” or “Refuse” on the questionnaire, there are no codes for these on mail surveys. These should be coded as “M” regardless of whether they are screener or gated questions.

Telephone:

* In instances where the respondent answers “I don’t know” or refuses to answer, the response codes of “98” for Don’t Know and “99” for Refused are to be submitted in the data.
* Should the respondent give an answer of “I don’t know” or refusal to a screener, the skip pattern should follow the path that a “No” response would follow. The gated responses are to be coded as “88” which has the meaning Not Applicable.
* Appropriately skipped gated items should be coded as “88” as well.

## Data Preparation

As will be explained in ***Chapter 7, Data Submission,*** survey vendors are responsible for reporting on the survey status of **every sampled patient** using one of the status codes listed in ***Exhibit 5-2, PCF PECS Final Status Codes***. They arealso responsible for submitting response information for every sample member who provided any questionnaire data, even if such data is incomplete.

This section contains specifications that explain which patient response records are to be considered a complete or partial complete. This section also contains guidance on how to handle, and assign status codes for, atypical situations arising with returned survey data.

### Definition of Complete and Partial Complete Surveys

**Definition:** A survey is a **complete** if responses are available for at least 16 of the 32 Applies To All (ATA) items and for at least one scored survey item. A survey is **partially complete** if responses are available for fewer than 16 of the 32 ATA items and at least one scored survey item.

***Exhibit 6-1*** lists all items in the PCF PEC Survey and delineates if each is ATA items and/or scored**.** Note that many of the ATA items are screener items. If the respondent leaves the screener item unanswered but answers the gated questions, the screener item does not count towards toward the number of ATA items answered (i.e., does not count towards reaching 16 of the 32). However, the response to the gated question is counted as a response to a scored survey item and a patient response record must be submitted from this patient.

The multi-answer race and proxy items count as a single item regardless of how many responses are chosen.

Patients who pass the complete threshold shall receive a final status code of 110 (Completed Mail), or 120 (Completed Phone); Patients who do not pass the complete threshold but pass only the partial threshold shall receive a final status code of 130 (Partially Completed Mail) or 140 (Partially Completed Phone). On mail cases, it is possible that a patient could pass the partial or complete threshold even after answering “No” to Q1 and/or “Zero” Q3 and vendors must still prioritize the passing of the threshold and give the final status code of 110 or 130. This would not be possible on phone cases because the CATI system would correctly follow the skip patterns if patients answered “No” to Q1 or “Zero” to Q3.

Exhibit 6-1  
PCF PEC Survey Items and Survey Completeness Criteria

| Survey Item # | Full PCF PECS Question Text | ATA Item [Yes/No] | Scored Item  [Yes/No] |
| --- | --- | --- | --- |
| Q1 | Our records show that in the last 6 months you got care from a primary care provider who works at the office location listed on the front cover (you may know this provider's office by another name). Is that right? | Yes | No |
| Q2 | If you know, please write in the name of the primary care provider you have seen the most often at this office in the last 6 months. | No | No |
| Q3 | In the last 6 months, how many times did you visit this provider to get care for yourself? | Yes | No |
| Q4 | In the last 6 months, did you contact this provider's office to get an appointment for an illness, injury, or condition that needed care right away? | Yes | No |
| Q5 | In the last 6 months, when you contacted this provider's office to get an appointment for **care you needed right away**, how often did you get an appointment as soon as you needed? | No | Yes |
| Q6 | In the last 6 months, did you make any appointments for a c**heck-up or routine care** with this provider? | Yes | No |
| Q7 | In the last 6 months, when you made an appointment for a **check-up or routine care** with this provider, how often did you get an appointment as soon as you needed? | No | Yes |
| Q8 | In the last 6 months, did you contact this provider's office with a medical question during regular office hours? | Yes | No |
| Q9 | In the last 6 months, when you contacted this provider's office during regular office hours, how often did you get an answer to your medical question that same day? | No | Yes |
| Q10 | In the last 6 months, did you contact this provider's office with a medical question **after** regular office hours? | Yes | No |
| Q11 | In the last 6 months, when you contacted this provider's office **after** regular office hours, how often did you get an answer to your medical question as soon as you needed? | No | No |
| Q12 | Did this provider's office give you information about what to do if you needed care during evenings, weekends, or holidays? | Yes | No |
| Q13 | In the last 6 months, how often did this provider explain things in a way that was easy to understand? | Yes | Yes |
| Q14 | In the last 6 months, how often did this provider listen carefully to you? | Yes | Yes |
| Q15 | In the last 6 months, how often did this provider seem to know the important information about your medical history? | Yes | Yes |
| Q16 | In the last 6 months, how often did this provider show respect for what you had to say? | Yes | Yes |
| Q17 | In the last 6 months, how often did this provider spend enough time with you? | Yes | Yes |
| Q18 | In the last 6 months, did you ask this provider's office a medical question using email, a patient portal, or a web portal? | No | No |
| Q19 | In the last 6 months, when you asked this provider's office a question using email, patient portal, or web portal, how often were all of the questions in your message answered? | No | No |
| Q20 | In the last 6 months, did this provider order a blood test, x-ray, or other test for you? | Yes | No |
| Q21 | In the last 6 months, when this provider ordered a blood test, x-ray, or other test for you, how often did someone from this provider's office follow-up to give you those results? | No | Yes |
| Q22 | In the last 6 months, did you take any prescription medicine? | Yes | No |
| Q23 | In the last 6 months, how often did you and someone from this provider's office talk about all the prescription medicines you were taking? | No | Yes |
| Q24 | In the last 6 months, did you and this provider talk about starting or stopping a prescription medication? | Yes | No |
| Q25 | When you talked about starting or stopping a prescription medicine, did this provider talk about the reasons you might want to take a medicine? | No | No |
| Q26 | When you talked about starting or stopping a prescription medicine, did this provider talk about the reasons you might **not** want to take a medicine? | No | No |
| Q27 | When you talked about starting or stopping a prescription medicine, did this provider ask you what you thought was best for you? | No | No |
| Q28 | Using any number from 0 to 10, where 0 is the worst number and 10 is the best provider possible, what number would you use to rate this provider? | Yes | Yes |
| Q29 | Specialists are doctors like surgeons, heart doctors, allergy doctors, skin doctors, or doctors who specialize in one area of health care. In the last 6 months, did you see a specialist for a particular health problem? | Yes | No |
| Q30 | In the last 6 months, how often did the provider named in Question 2 seem informed and up-to-date about the care you got from specialists? | No | Yes |
| Q31 | In the last 6 months, did you need help from anyone in this provider's office to manage your care among different providers and services? | No | No |
| Q32 | In the last 6 months, did you get the help you needed from this provider's office to manage your care among different providers and services? | No | No |
| Q33 | In the last 6 months, did someone from this provider's office talk with you about specific goals for your health? | Yes | Yes |
| Q34 | In the last 6 months, did someone from this provider's office ask you if there are things that make it hard for you to take care of your health? | Yes | Yes |
| Q35 | In the last 6 months, how often were clerks and receptionists at this provider's office as helpful as you thought they should be? | Yes | No |
| Q36 | In the last 6 months, how often did the clerks and receptionists at this provider's office treat you with courtesy and respect? | Yes | No |
| Q37 | Does this provider's office offer any extended hours, such as early mornings, nights, weekends, or holidays? | No | No |
| Q38 | In the last 6 months, did you need care from this provider's office during extended hours, such as early mornings, nights, weekends or holidays? | No | No |
| Q39 | In the last 6 months, how often were you able to get the care you needed from this provider's office during extended hours, such as early mornings, nights, weekends or holidays? | No | No |
| Q40 | In the last 6 months, have you been a patient in a hospital overnight or longer? | No | No |
| Q41 | Within 3 days after your most recent hospital stay, did someone from the provider's office named on the front cover contact you to follow-up on your hospital stay? | No | No |
| Q42 | In the last 6 months, have you gone to an emergency room or emergency department for care? | No | No |
| Q43 | Within one week after your most recent emergency room or emergency department visit, did someone from the provider's office named on the front cover contact you to follow up on the visit? | No | No |
| Q44 | In the last 6 months, did someone from this provider's office ask you if there was a period of time when you felt sad, empty, or depressed? | Yes | No |
| Q45 | In the last 6 months, was there a period of time when you felt sad, empty, or depressed? | No | No |
| Q46 | In the last 6 months, did someone from this provider's office help when you felt sad, empty, or depressed? | No | No |
| Q47 | In the last 6 months, did someone from this provider's office talk with you about things in your life that worry you or cause you stress? | Yes | No |
| Q48 | In the last 6 months, was there a period of time when things in your life worried you or caused you stress? | No | No |
| Q49 | In the last 6 months, did someone from this provider's office help during a period of time when things in your life worried you or caused you stress? | No | No |
| Q50 | In the last 6 months, did someone from this provider's office ask you about alcohol use or drug use? | Yes | No |
| Q51 | In the last 6 months, was there a period of time when you had a problem with alcohol use or drug use? | No | No |
| Q52 | In the last 6 months, did someone from this provider's office help with your alcohol use or drug use? | No | No |
| Q53 | In the last 6 months, did someone from this provider's office ask you about any nonmedical needs, such as food, housing, or transportation? | No | No |
| Q54 | In the last 6 months, was there a period of time when you had any nonmedical needs, such as food, housing or transportation? | No | No |
| Q55 | In the last 6 months, did someone from this provider's office help you get nonmedical needs, such as food, housing, or transportation? | No | No |
| Q56 | In general, how would you rate your overall health? | Yes | No |
| Q57 | In general, how would you rate your overall **mental or emotional** health? | Yes | No |
| Q58 | What is your age? | Yes | No |
| Q59 | Are you male or female? | Yes | No |
| Q60 | What is the highest grade or level of school that you have completed? | Yes | No |
| Q61 | Are you Hispanic or Latino origin or descent? | Yes | No |
| Q62 | What is your race? Mark one or more. | Yes | No |
| Q63 | Did someone help you complete this survey? | Yes | No |
| Q64 | How did that person help you? Mark one or more. | No | No |

### Handling Blank Questionnaires

Receipt of a questionnaire by mail that passes the completed or partially completed threshold removes the need for the survey vendor to send additional mailings or include the patient in the telephone non-response follow-up. Receipt of a blank questionnaire, however, does not eliminate this need. This section provides specifications for blank questionnaires.

In handling questionnaires that are returned blank, survey vendors should differentiate between mail questionnaires that are returned blank by the sample patient or their family/friend, versus those returned because the United States Postal Service could not deliver the mail, versus those on which a message is included about survey status.

* Returns from the United States Postal Service typically contain messages specifying the reason for non-delivery. If a viable address can be obtained, the survey vendor should send the second questionnaire package to the sample patient provided there is still time to do so. If there is not time to do so, the patient is to be included in the telephone follow-up effort.
* Returns by the sample patient or their family typically arrive in the business reply envelope.
  + If the questionnaire contains a note indicating a refusal from the patient or family member, or indicating a reason that makes the patient ineligible, the survey vendor must stop all contact with this patient and assign the appropriate final status code. Depending on the note, assign either an ineligible code: 150 (Deceased), 160 (Ineligible—Does not Meet Eligibility Criteria), 170 (Language Barrier), 180 (Mentally or Physically Incapacitated) or 190 (Ineligible—Did Not Receive Care At Practice), or the Refusal code 220 (Refusal) or 230 (Hostile Refusal).
  + If the questionnaire contains no note indicating a refusal or ineligibility, the following instructions apply.

1. If the first questionnaire is returned blank, the survey vendor should send the second questionnaire package to that sample patient provided there is still time to do so. If there is not time to do so, the patient is to be included in the telephone follow-up effort.
2. If the second questionnaire is returned blank, the survey vendor is to include the patient in the telephone follow-up effort.
3. Note that all cases that ***are not finalized*** as a result of the mail survey component must be assigned for telephone follow-up, including both cases that are returned blank and undeliverable mail.

### Handling Duplicate Surveys by Mail and Phone

As noted in Section ***5.5.9, Process Data from Questionnaires Returned by Mail***, survey vendors must have a mechanism through which they are alerted to duplicate mail questionnaires. In addition, they must have a mechanism to determine if a sampled patient has answered the survey through a paper questionnaire as well as by telephone.

In the event of duplicates, the survey with the more complete data is retained. If both surveys are equally complete, the first survey received is retained. Data from unused surveys are not submitted to CMS.

## Survey Status Codes

Maintaining up-to-date survey status codes is a key part of the PCF PEC Survey administration process. Typically, status codes are either interim (which indicate the status of each sampled patient during the data collection period), or final (which indicate the final outcome of each sampled patient at the end of data collection). **Survey vendors should use their internal interim status codes for tracking purposes and should not report such codes to CMS**. However, they must include internal interim status codes with a crosswalk to PCF PECS final status codes in their QAP.

As will be explained in ***Chapter 7, Data Submission***, PCF PECS requires two interim data submissions prior to the final data submission. When submitting data files, either interim or final, each patient must be assigned a status code from ***Exhibit 5-2, PCF PECS Final Status Codes.*** At the time of the interim data submissions, many sampled cases will still be pending. **For interim submissions only**, survey vendors must submit a non-final status code of 270 (Pending) for those cases that have not yet completed or been assigned another final status code. For the final data submission, only final status codes may be assigned. Use the following guidelines.

* If a patient or proxy responded and passed the complete threshold, assign 110 (Completed Mail) or 120 (Completed Phone). The date of phone completion or receipt of the paper survey must also be submitted.
* If the patient or proxy responded and passed the partial threshold only, assign 130 (Partial Mail) or 140 (Partial Phone). The date of phone completion or receipt of the mail survey must also be submitted.
* If the answer to Q1 was “No” or the answer to Q3 was “zero” and the case did not pass the partial or complete threshold, assign 190 (Ineligible: Did Not Receive Care at Practice). This applies to both telephone and mail cases.
* If the patient or a proxy has not formally answered Q1 or Q3 but has notified the Help Desk, or noted on their returned mail questionnaire, that they did not receive care at the practice in the last 6 months, assign 190 as well.
* Assign 150 (Ineligible: Deceased) when learning of a patient who is deceased at the time of the survey. Also assign 150 upon hearing that a proxy completed the survey on behalf of a deceased patient. However, if a patient dies after completing the survey or obtaining another final status code such as 190, do not change the final code; the original code should remain.
* Assign 160 (Ineligible: Does Not Meet Eligibility Criteria) to either mail or telephone survey cases if it is determined that the sample patient is under age 18 or resides in a nursing home or other skilled nursing facility or other long-term facility, such as a jail or prison.
* Assign 170 (Language barrier) to sample patients who do not speak English or Spanish and do not have a proxy who can translate the survey into the patient’s language.
* Assign 180 (Ineligible: Mentally or Physically Incapacitated) if it is determined that the sample patient is unable to complete the survey because he or she is mentally or physically incapable and there is not a helper or a proxy who can help the patient complete the survey.
* Assign 210 (Incomplete) if the sample patient responded to some questions but not enough to meet either completeness criteria, did not screen out, and there is no evidence of the patient’s ineligibility. This code is appropriate for telephone breakoffs as well as blank questionnaires returned where we were not able to obtain more data via the telephone follow-up.
* Assign 220 (Refusal) if the sample patient indicates either in writing or verbally that he/she does not want to participate or wants us to stop calling him/her.
* Assign 230 (Hostile Refusal) Assign this code to true hostile refusals. Include any sampled cases on the survey vendor’s Do Not Contact list.
* Assign 240 (Wrong, Disconnected, or No Telephone Number) upon finding evidence that the telephone number the survey vendor has for the sample patient is disconnected, non-working, out of order/service, or does not belong to the sample patient and no new telephone number is available. (See “When to code numbers as permanently out of service in ***Section 5.6.4, Make Required Attempts to Reach Patient***).240 can also be assigned if no phone number was provided for the sample member.
* Assign 250 (No Response After Maximum Attempts) if there is no evidence that the sample patient’s address or telephone number is unviable but the sample patient has not responded after all questionnaire mailings or telephone attempts have been implemented.
* Assign 260 (No Response To Mail Survey – RCF Patients) to patients flagged as residential care facility patients and for whom no other final code (ineligible, complete, refusal) from the mail survey has been recorded.
* Use code 200 (Excluded from Survey) for patients, if any, determined to be ineligible before data collection was initiated.
* If a questionnaire was returned after the data collection cutoff, it is to be discarded and disregarded (see ***Section 5.5.8, Conduct Data Receipt of Questionnaires Returned by Mail***). These patients should not have a patient response record, and the final status code of the sampled patient should be a reflection of the patient’s status prior to this late arrival (i.e., 250, 240, etc.).
* Use code 270 for sample patients whose survey status is pending at the time of the interim data submissions. In the final submission, no patients may have code 270.

# Data Submission

## Overview

This section contains information about submitting PCF PEC Survey data files to CMS’ contractor, RTI. CMS requires that all survey vendors submit two interim and one final data submission for all of their associated practice sites. The interim data submissions will allow RTI to conduct quality control review and provide early feedback to vendors if errors are detected. Interim data submissions are for quality control purposes only and do not satisfy the final data submission requirement. All interim and final data submission deadlines are shown in ***Figure 7‑1***. Survey vendors should routinely check the PCF PECS web portal for updated information. Survey vendors must submit files by 7:59 PM ET by the date associated with each submission deadline.

This section describes the file specifications, validations performed on the file, and reports designed to help survey vendors pinpoint errors, if any, in their submissions. Any differences between submitting interim and final files are also explained.

Figure 7-1  
Data Submissions Timing

## From Which Practices is a Data Submission File Expected?

CMS expects a data submission from every active PCF practice site, and expects this submission to be supplied by each practice site’s authorized survey vendor. CMS provides survey vendors with a convenient report, the Vendor Authorization Status Report, which gives transparency into all PCF practice sites who have authorized them. If there is any reason—such as vendor switches, practice closure, merger with another practice or leaving the PCF program—that this list does not reflect *exactly* those practice sites the vendor will be conducting a survey and submitting data for, the vendor should contact the [PCF PECS Helpdesk as soon as possible](mailto:pcfpecs@rti.org). **Failure to conduct the PCF PEC Survey and submit data will result in the practice forfeiting part of its quality payment from the PCF Model.**

Note that CMS and their contractor RTI cannot be involved in business arrangements between vendors and practices.

## Data to Submit

PCF PEC Survey vendors will upload PCF PECS data using XML (extensible markup language) data files. Each XML file will consist of three sections: a Header Record, a Patient Administrative Data Record, and the Patient Response Record.

Each XML file must contain one header record, a patient administrative record for every sampled patient, and a patient response record for every patient with questionnaire data. This applies to both interim and final file submissions>

Data layouts of all three records will be available on the PCF PECS web portal. The sections below describe them.

### Header Record

The Header Record contains the identifying information for the PCF practice for which data are included on the file, sampling information, the Performance Year, and the dates that data collection began and ended for the survey period. The fields are:

1. Practice Site Name
2. Practice Site ID
3. Performance Year
4. Number of Patients Sampled. Number should include any patients ultimately coded 200 and should exclude any seeded sample.
5. Date data collection period began. Use the official mail date of the teaser postcard, even if for this practice there is a late postcard (which must be documented by a Discrepancy Notification Report (see section ***5.7, Exceptions Request Procedure*** and ***5.8, Discrepancy Report Procedure***). The official begin date shall also be used when submitting interim files.
6. Date data collection period ended. Use the official period end date for this Performance Year survey, even if for this practice there is a late end date. The official end date shall also be used when submitting interim files.

All fields in the Header Record must have a valid entry.

### Patient Administrative Data Record

The second part of the XML file contains data about each patient who was sampled, including both respondents and nonrespondents. In this section of the file, some of the information provided in the Header Record is repeated, including the practice site’s ID and Performance Year. All other information included in this section of the file is about the patient. ***There must be a Patient Administrative Data Record for every patient sampled, even for the interim submissions****.* The Sample ID (SID) number assigned to each patient must be included. *Only de-identified data will be submitted; however, the unique SID number that was assigned to the sampled patient by RTI must be included on the file.*

Final Survey Status codes will be required even for interim data submissions. For interim data submissions ONLY, use 270 (Pending) for those cases that may not yet had all contact attempts and may still complete between interim data submission and final data submission.

The fields in the patient administrative record are:

1. Practice Site ID
2. Performance Year
3. Sample ID (SID) (as assigned by RTI to the patient)
4. Final Survey Status (must be one of the codes in ***Exhibit 5-2.*** Follow instructions in ***Section 6.4, Survey Status Codes***).
5. Date Survey received. For cases meeting the definition of full or partial complete, provide mail receipt date (for mail surveys) or date interview completed (for telephone surveys). For cases not meeting the definition of full or partial complete but do have response data, use the mail receipt date (for mail surveys) or interview/breakoff date (for telephone surveys). Use 88888888 for patients who have no response data, on Interim and Final submissions.
6. Survey Language (use 1 if English, 2 if Spanish, X if no response record).
7. Completion Mode (use 1 if mail, 2 if phone interview, X if no response record). On the interim mail-only submission (1st interim submission), all cases shall be coded as either 1 or X. On the 2nd interim submission, cases could be 1, 2, or X.

A valid value must be entered for each variable in the Patient Administrative Data Record.

### Patient Response Record

The third part of the XML file is the patient response record, which must contain the responses to the PCF PEC Survey from every patient with any survey data.

The patient response record contains one field for every item in the PCF PEC Survey. Acceptable data values include all values from the survey item’s code frame as well as M for “Missing”, 88 for “Not applicable”, 98 for “Don’t Know” for phone only, and 99 for “Refused” for phone only. Two survey items have multiple fields. Question 62 (“What is your race? Mark one or more.”) contains six fields, one for each possible choice which can be selected. Similarly, Question 64 (“How did that person help you? Mark one more more.”) contains 5 fields, one for each possible choice which can be selected.

As mentioned previously, the following exceptions are to be excluded from the patient response record:

* Seeded cases
* Patients whose surveys arrived or whose phone interview was completed after the end of the data collection period (as stated in ***Section 5.5.8, Conduct Data Receipt of Questionnaires Returned By Mail***)
* Patients who the vendor becomes aware were completed by a proxy and were deceased at the time their survey was completed (as stated in ***Section*** ***6.4, Survey Status Codes***)
* Where there are duplicate questionnaires for the same patient, or a mail questionnaire and a phone interview, submit data for only one following the rules in ***Section 6.3.3, Handling Duplicate Questionnaires***. Vendors must ensure they exclude the un-chosen duplicate from the patient response record
* Data from any practice-specific added questions (as stated in ***Section 5.5.6, Instructions About Adding Practice-Specific Questions***)
* Review these rules in ***Section 6.2, Data Coding Guidelines.***

## XML File Quality Control Procedures

Before submitting XML files—either interim or final—to the PCF PECS web portal, vendors must follow all required quality control procedures. CMS also advises following the recommended quality control procedures.

Survey vendors are required to do the following:

* Use the XML Schema Validation tool to conduct initial quality control on their XML files. The web-based XML Schema Validation Tool is available on the PCF PECS web portal under the “Data Submission” tab. It contains all of the validation checks that are applied when the XML file is uploaded (see ***Section 7.5.2, Validations Performed Upon Upload***), so using the Schema Validation tool to identify file problems allows vendor an opportunity to correct them before submission. The XML Schema Validation Tool also checks that data element ranges in all records fall within acceptable ranges.
* Ensure that there is information included in the Patient Administrative Section of the XML file forevery sample patient who was included on the sample file that the survey vendor downloaded for this particular survey year. For example, if 296 patients were sampled for Performance Year 1 survey, a record for each of those 296 sample patients must be included on the administrative data record that the survey vendor submits.
* Check to make sure that the SID numbers included on the XML file match the same set of SID numbers that were included on the sample file that they downloaded from the PCF PECS web portal. Survey vendors must also conduct quality control checks to make sure that survey response data are matched to the correct patient.
* Confirm the completeness criteria on all surveys and reconciling case statuses before submission. Specifically:

1. Patients with final status codes 110 or 120 must have response data which passed the complete criteria, while patients with final status codes of 130 or 140 must have response data which passed the partial complete criteria. The reverse is true as well: patients who have passed the completeness criteria must be given a status of 110 or 120 if complete or 130 or 140 if partially complete.
2. Patients with final status code of 190 (Ineligible: Did Not Receive Care At Practice) should have screened out according to Q1 or Q3 and should not meet either completion criteria. The reverse is also true: patients who have screened out according to Q1 or Q3 and did not meet the completion criteria must be given a status of 190. Note that these patients will typically have data in the “About You” questions. Remember that if the patient meets completion criteria despite their answer to Q1 or Q3 suggesting screen-out, their status codes should be 110, 120, 130, or 140.
3. Patients who do not fall into either category 1 or 2 but do have some questionnaire data must also be submitted. For the final data submission, these patients will typically have a status code of 210, Incomplete, though other status codes may be possible.

* Compare a sample of cases on the XML file to the matching hardcopy questionnaire or original CATI data file, to ensure that the data on the XML file are accurate.

The following are recommended:

* Determine whether there is a potential data problem or to identify a problem with computer programs, vendors are strongly encouraged to generate response distributions (also referred to as frequencies) and compare them to survey response coding from the hardcopy mail questionnaire (if the survey was completed by mail) or the CATI file (for interviews completed by phone). Look for anomalies or outliers and for unusual patterns of missing data. When preparing XML files, survey vendors should make sure that they are assigning the not applicable code (88) and the code for missing response (M) correctly.

## Submission Procedures

To submit PCF PEC Survey data files, survey vendors must access the secure portion of the [PCF PECS web portal Exit icon](https://www.pcfpecs.org) by logging in with their unique password and user ID

The steps in data submission are summarized as follows:

1. Log on to the PCF PEC Survey web portal; when logged on, the system will display the vendor’s dashboard.
2. Click the *Submit Data* dropdown link under *Data Submission*. The data submission tool page will display.
3. Click the “Select” button to select the file to upload. The Select button permits users to locate and directly upload a file that has been saved in their own computer system. Survey vendors can select either a single XML file or a single ZIP file that contains 1 XML files each from multiple practice sites. Do not include more than 100 XML files in a single zip file.
4. After selecting the file to be uploaded, click “Upload XML” to submit the file.
5. To upload more than one file at a time, click the “Add” button on the same screen. Additional file selection rows will be added. Repeat Step 3 for each file to be uploaded.
6. To remove rows that have been added, click the “Remove” button to the right of the row to be deleted.

### File Naming Conventions

When creating a practice site’s XML data file, include the practice’s PCF Practice ID and performance year as part of the following example. This will make it easy for you keep the files organized, especially when you have multiple practice sites with whom you have contracted and may be including all their XMLs in a single zip file. An example of an XML file name:

Practice ID\_Year.xml: ZZ1234\_2021.xml

### Validations Performed Upon Upload

When survey vendors upload PCF PEC Survey interim or final data files to the PCF PECS web portal, the XML file will undergo several validation checks. The first check will determine whether the practice site ID is consistent between the header record and the patient administrative record, and if that practice site ID is in alignment (according to the survey vendor authorization) with the vendor ID submitting the XML file. The next validation checks will determine the quality and completeness of the data. If the file fails any of the validation checks, the survey vendor will receive an error message within seconds after a file error is detected noting that the file upload failed, giving details on why the file failed to upload. For example, the message might indicate that there is no authorization from the practice site for the survey vendor to submit data on its behalf or that the number of patient records listed in the header record does not match the number of sample patients for which data are provided in the patient administrative data record section of the file.

If a file did not pass the upload validations, none of the data on the file are accepted and stored. Survey vendors must review data submission reports (discussed in the following section) and correct any data errors on the XML file and resubmit the file.

## Data Submission Reports

CMS, through its contractor RTI, will generate and provide via the PCF PECS web portal a number of reports to indicate the status of data submissions and the quality of the data submitted. Reports will be generated for both PCF PEC Survey vendors and PCF Practice Sites.

### Reports for Survey Vendors

The most important of these is tied to the data submission and file review process—the *Data Submission History Report*. This displays all practices associated with the vendor, whether data from each practice has been submitted and accepted, and other key figures about each practice such as number of completes and response rate. Another important report is the *Survey* *Vendor* *Authorization Report*, which allows the survey vendor to view all PCF practice sites that have authorized the survey vendor to collect and submit data on their behalf.

### Reports for PCF Practice Sites

The *Data Submission History Report* provides a means by which a practice sites can monitor its vendor’s data submission activities.

## Resubmitting Files

There is no limit to the number of times survey vendors can resubmit an interim data file for a practice site. The web portal will accept interim submissions from shortly before the interim deadline and remain open to vendors until the interim submission deadline. We recommend survey vendors submit after each practice site passes the initial validation and all checks in the Schema Validation tool.

Once the final submission option opens, survey vendors may submit a final file as many times as they would like, prior to the data submission deadline.

However, survey vendors must keep in mind that each time a data file (interim or final) for a practice site is submitted, it overwrites any data for that same practice site that were previously submitted for that performance year. **When the submission deadline for interim or final submission arrives, the last successful submission is the one which CMS accepts.**

CMS will not accept final data files that are submitted after the data submission deadline; therefore, we strongly encourage survey vendors to submit their data files well in advance of the data submission deadline.

## Assistance with Data Files and Data Submissions

Survey vendors that need assistance with the XML file should contact RTI’s PCF PECS Team for technical assistance at the number **1-833-997-2715** or by sending an email to [pcfpecs@rti.org](mailto:pcfpecs@rti.org).

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# Data Analysis and Reporting

## Overview

This section briefly explains CMS’ scoring of the PCF PECS data, and explains the data analyses that survey vendors may conduct for the PCF practice site clients.

## CMS Analysis of the PCF PECS Data Set

CMS’ responsibilities (described briefly in ***Section 3.2.5, Review, Score, and Report Personalized Data to Practice Sites)*** include scoring the PCF PEC Survey data and providing practice sites a report with their official survey results. Should a practice site have any questions about the scoring, domains, or Quality Gateway beyond the basics covered in this ***Quality Assurance Guide***, they should contact [PCF Support](mailto:PCF@telligen.com) or consult the [*PCF Payment and Attribution Methodologies Paper*](https://innovation.cms.gov/media/document/payment-and-attribution-methodologies-py20). CMS transforms each scored survey question into numeric values assigned to responses for one of the five domains (described in ***Section 2.1, About the Primary Care First Model Option***). The 5 domain-specific measures are calculated from the contributing survey questions, and the PECS Summary Score is calculated as the average of the 5 PECS domain-specific measures. The PECS Summary Score is then case-mix adjusted. The practices are then ranked based on their PECS Summary Score on a continuous 0–100 scale to establish their percentile ranking.

## CMS’ Reports and Training Given to PCF Practice Sites

CMS prepares and disseminates to each practice site a personalized score report showing their results on all domains and all questions, compared to results at the region level and overall PCF level. This report will reflect all completed and partially completed cases. It will show the five domains averaged into the PECS Summary Score. Figures will include raw data as well as risk-adjusted, final performance scores, in a user-friendly format. CMS will disseminate these reports to the practices in late Spring.

Vendors should also be aware that CMS trains practice sites on understanding their PEC Survey scores and other quality measure scores throughout PCF to facilitate quality improvement. Services which many vendors provide in the quality improvement realm may be unnecessary for PCF PECS practice sites, as they will receive pertinent and specific training at no cost from CMS.

## Survey Vendor Analysis and Reporting of PCF PECS Data

A survey vendor may analyze the survey data in order to provide their client practices with earlier or additional reports on their survey results. This section will present guidelines vendors must follow should they elect to provide reports.

1. CMS-calculated results for PCF PECS and the practice-level report CMS disseminates in the Spring (***Section 8.3, CMS’ Reports and Training Given to PCF Practice Sites***) are the official survey results. Survey vendors will not have sufficient information to replicate CMS scoring. **All reports provided to PCF PECS practice sites must include a statement that vendor results are not official CMS results and are for Practice’s internal quality improvement purposes only. The statement must be printed in a minimum 14-point font size**.
2. Survey vendors may provide PCF practice sites with survey data or information from their practice as long as the survey vendor suppresses any report or display of data that includes cell sizes with fewer than 11 observations.
3. No information based on fewer than 11 respondents can be released, meaning no cell sizes under 11 can be displayed in any cross tabulations, frequency distributions, tables, Excel files, or other reporting mechanisms.
4. No number smaller than 11 should appear in any material provided to client practice sites.
5. When suppressing the number of observations in cells because they have fewer than 11 observations, the survey vendor must not report row and column totals as this would allow the cell value to be derived.
6. Survey vendors must have CMS approval to append data from the sample file to the survey data. For example, if survey vendor wants to report on survey responses, or survey response rate by the variables on or derived from the sample file (e.g., region, age), the vendor must submit to CMS (via their contractor RTI) a specific list of the items to be merged as well as an analytic plan that explains how the data will be used. The survey vendor may not append data until written approval from CMS is received. CMS will not approve requests if the appending allows identification of the sample member or patient.
7. Survey vendors are not permitted to provide practices with patient identifying information, as this would violate the guarantee of confidentiality that CMS provides all survey respondents.
8. Survey respondents cannot give permission for their name to be shared with the practice, even if they wish to do so.
9. Added practice-specific questions may collect open ended comments or service information that could identify the patient. When reporting on the results of these practice specific questions, survey vendors must do so in a way that the patient cannot be identified. See ***Section 5.5.6, Instructions About Adding Practice-Specific Questions*** for more details.
10. Survey vendors should contact the PCF PECS Team for additional guidance if they are not clear as to whether certain types of survey response data can be shared with a PCF practice site. The PCF PECS Team can be reached at [pcfpecs@rti.org](mailto:pcfpecs@rti.org) or by calling 833-997-2715.

# Data Confidentiality and Data Security

## Overview

This section describes vendor requirements for ensuring data confidentiality and security of sample patient information. Any requirements for vendors are also incumbent upon subcontractors who receive PII. The section begins with instruction on assuring sample patients about confidentiality. Procedures for handling and storing confidential data in physical and electronic formats, as well as when electronic data is in transit, are then explained. This section also delineates the confidentiality agreements, which were mentioned in earlier sections, that are required on PCF PECS.

## Assuring Sample Patients of Confidentiality

Some patients might not be willing to participate in the survey, or share honest and potentially negative feedback on their practice, if they believe the practice can attribute their survey responses to them personally. Giving patients the information to feel confident that their identity is confidential is critically important. This is accomplished through the following:

* The letters sent to sampled patients state that their answers are confidential and will not be shared with their provider and will not affect health care benefits.
* The introductory statements in the telephone interview state this as well, adding that their information is protected by the Privacy Act.
* Help Desk and Telephone Interviewing staff should give the following information, as needed, to sample patients concerned about confidentiality:
  + The information they provide is protected by the Federal Privacy Act of 1974 (if the vendor so chooses, it may exclude the word “Federal” or the phrase “of 1974”).
  + Project staff have signed affidavits of confidentiality and are prohibited by law from using survey information for anything other than this research study.
  + If a patient questions why HIPAA allowed the release of their information to a survey organization: HIPAA allows the release of patient contact information for the purpose of public health research, such as this survey.
  + Their survey responses will never be reported with their name or other identifying information.
  + All respondents’ survey responses will be reported in the aggregate; no practice will see individual answers.
  + They can skip or refuse to answer any question they do not feel comfortable with.
  + Their participation in the study will not affect their care or Medicare benefits they currently receive or expect to receive in the future.

## Safeguarding Patient Data

All survey vendors, including their subcontractors, if any, approved to implement the PCF PEC Survey must adhere to HIPAA requirements. Any identifying information associated with a patient should be considered private and must be protected in accordance with HIPAA. When the sample is received from the PCF PECS Team, it will contain PII, such as the name and address or telephone number of the patient. From the moment the survey vendor downloads the sample, the data must be handled in a way to ensure that the patient information is kept confidential and that only authorized personnel have access to it.

Survey vendors are not permitted to share any patient identifying information with any individual or organization, including their practice clients. Practices must never know which of their patients were included in the survey and whether their patients completed the survey. It is advised that vendors review ***Section 8.4, Survey Vendor Analysis and Reporting of PCF PECS Data*** rules #3–7, where the allowable information sharing with practices is defined.

Survey vendors must adhere to the following requirements when conducting the PCF PEC Survey.

### Limit Access to Confidential Data to Authorized Staff

Survey vendors should consider carefully which of their staff (and subcontractor staff if appropriate) need access to confidential patient data, and then ensure that only those staff members have access to the portions of the data required for their activities.

### Physical Security of Patient Data

* Paper copies of questionnaires or sample files must be stored in a secure location, such as a locked file cabinet or within a locked room.
* At no time should paper copies be removed from the survey vendor’s premises, even temporarily.
* Paper copies of questionnaires must be stored in a secure location at the survey vendor’s facility, such as a locked room or file cabinet, for 3 years. Paper copies of questionnaires do not need to be kept if electronic images of the questionnaires are being kept instead.
* The above requirements apply to vendors and their subcontractors who have access to PII.

### Electronic Security of Patient Data

* Electronic data must be protected from confidentiality breaches. Electronic security measures may include firewalls, restricted-access levels, or password-protected access. Vendors are strongly urged to implement a password policy that requires their employees to create and use strong passwords that must be changed on a regular and frequent basis. Data stored electronically must be backed up nightly or more frequently to minimize data loss.
* If it is necessary to transmit data between or within organization, vendors may not use email. They must use network share drives, secure ftp sites, or access-limited web portals where data may be placed for transfer. Files shall be transmitted in encrypted format and password protected. Any files transmitted between organizations using a web portal or ftp site must be downloaded promptly by the receiving organization and removed by the originating organization immediately thereafter. (Note: the transmission of the sample files from RTI to survey vendors is accomplished through RTI’s secure web portal, where it is protected by Secure Socket Layer (SSL) certificate.)
* All files submitted to the PCF PECS web portal must contain de-identified data only. Only the unique Sample ID number originally assigned to each sample patient should be included on the file for each data record.
* Electronic images of paper questionnaires or keyed data, including CATI data, must be retained for 3 years, also in a secure location at the survey vendor’s facility.
* Vendors must have a disaster recovery plan for the PCF PEC Survey data. The PCF PECS Team cannot provide specific guidelines on the contents of this plan. However, survey vendors are encouraged to consult with their organization’s Data Security team/division for guidance, if they have questions.
* These above requirements apply to both vendors and their subcontractors who have access to PII.

## Develop Procedures for Identifying and Handling Breaches of Confidential Data

Survey vendors and subcontractors as appropriate are required to develop protocols for identifying when there has been a breach of security with PCF PEC Survey data, including when an unauthorized individual has gained access to confidential information and when an authorized individual has distributed confidential data in an unauthorized manner. The survey vendor’s plans must include a system to notify the PCF PECS Team at RTI within 3 business days of learning of a security breach. The survey vendor’s plans must also include providing within 2 weeks of breach identification: a means to detect the level of risk represented by the breach in security, a means to take corrective action against the individual who created the breach, and a means of notifying any persons affected by the breach, including sample patients, if necessary.

## Required Confidentiality Agreements

### Business Associate Agreement with Practice

All approved PCF PECS survey vendors must become Business Associates of their client practices (see ***Section 3.3.5, Sign Business Associate Agreement and Adhere to Data Security Protocols***). They must follow all applicable HIPAA guidelines regarding privacy and security of practice-generated PII.

### Vendor and Subcontractor Staff Confidentiality Agreement

Any vendor and subcontractor staff must receive HIPAA-appropriate training on confidentiality and data security before receiving access to patient information on PCF PECS. Staff in need of training include telephone interviewers, supervisors, Help Desk staff, coders, and fulfillment staff, programmers and other staff. Staff must sign affidavits attesting to their training and their agreement to uphold patient confidentiality. Vendors must retain electronic or hard copies of the affidavits and submit them to RTI if requested.

Note that some survey organizations have a general Confidentiality Agreement that applies to all surveys that they conduct; survey vendors may use a general Confidentiality Agreement that applies to all surveys on which their employees work.

# Oversight

## Overview

CMS, through its contractor RTI, conducts oversight of PCF PEC Survey vendors to ensure compliance with PCF PEC Survey protocols. This section lists the oversight activities for the PCF PEC Survey and summarizes vendors’ requirements for participating in this oversight. In addition, vendors should be aware that any and all materials relevant to survey administration are subject to CMS’ review.

## Oversight Activities and Timeline

***Exhibit 10-1*** presents the dates of oversight activities for Performance Year 1.

Exhibit 10-1  
PCF PECS Oversight Timeline

| Oversight Task | Performance Year 1 (January 1– December 31, 2021) Timing |
| --- | --- |
| Conditionally-approved vendors submit Quality Assurance Plans (QAP) to PCF PECs Team | No later than April 16, 2021 |
| PCF PECS Team reviews QAPs and provides feedback to vendors | No later than April 30, 2021 |
| PCF PECS conditionally-approved vendors resubmit QAPs where required | No later than May 14, 2021 |
| PCF PECS fully approved vendors resubmit approved QAP with completed templates of all mail and telephone survey materials | No later than August 13, 2021 |
| PCF PECS fully approved vendors submit mail interim data file to web portal | October 26, 2021 (3 weeks after 1st survey mailing) |
| PCF PECS fully approved vendors submit mail/CATI interim data file to web portal | December 8, 2021 (containing data for first 3 days of CATI) |
| PCF PECS fully approved vendors supply telephone interviewer recordings | December 8, 2021 (containing first recordings for 3 days of CATI) |
| PCF PECS fully-approved vendors supply documentation of interviewer training, including HIPAA training | December 8, 2021 (1 calendar week after CATI start) |
| PCF PECS fully-approved vendors submit final data files | No later than January 18, 2022 |
| Site visits | Starting October 5, 2021 |

Figure 10-1  
Quality Assurance Plans Timing

## Quality Assurance Plans (QAPs)

The QAP is a comprehensive working document that is developed, and periodically revised, by survey vendors for documenting their administration procedures for the PCF PEC Survey. Vendors should use the QAP as a training tool for project staff and subcontractors. The submission and approval of a QAP is a component in the process through which vendors attain the status of Fully Approved. Only Fully Approved vendors are named on list of PCF PECS vendors that is disseminated to PCF Practices, and only Fully Approved vendors may conduct the PCF PECS. Several months after attaining Full Approval, survey vendors are required to submit an updated QAP containing all mail and telephone survey materials (see ***Figure 10-1***).

### Submission by Vendors

A model QAP outline is included in ***Appendix O*** to assist vendors in the development of their own QAP. It is divided into the following sections:

* Organization Background and Staff Experience
* Work Plan
* Survey Implementation Plan
* Data Security, Confidentiality, and Privacy Plan
* Questionnaire and Materials Attachments (section not required in the original QAP submission)

Survey vendors should organize the information in their QAPs to conform to the sections included in the model QAP’s outline. Survey vendors should answer the outline’s questions in sufficient detail to demonstrate their understanding, implementation ability, and soundness of quality assurance plans for these aspects of PCF PECS.

Vendors shall submit their QAPs to the PCF PECS web portal no later than 7:59 PM ET of the deadline.

### Review by CMS and Resubmission of QAPs When Needed

CMS evaluates the QAPs to determine if they demonstrate vendor compliance with all protocols for implementation and quality control/assurance. If a QAP lacks sufficient detail to confirm this, CMS will explain the deficiency to the vendor and give the vendor a date by which a revised QAP must be submitted. The vendor will be required to correct the identified issue and resubmit. Delays in QAP submission or resubmission may result in vendors not appearing on the list of Fully Approved Vendors when that list is first disseminated.

### Mail Templates and Telephone Survey Materials

Vendors will be required to submit templates of all mail materials and screenshots from their CATI system in a revised version of their QAP. Vendors may submit the revised QAP containing these materials section at any point until 7:59 PM ET of the deadline noted in ***Exhibit 10-1***.

#### Mail Materials

One dummy patient in 1 practice should appear on all mail templates. Templates for the following materials must be supplied:

* Teaser postcard
* Questionnaire Mailout #1 including letter, English mail questionnaire, outgoing envelope, outgoing envelope for residential care patients, and return mail envelope
* Reminder postcard
* Questionnaire Mailout #2 including letter, English mail questionnaire, outgoing envelope, outgoing envelope for residential care patients, and return mail envelope
* Spanish mail questionnaire

The RTI team evaluates the templates for accuracy and visual clarity. RTI will review will approve templates within 2 weeks. All templates must receive RTI approval before they can be used. Only approved templates may be used for PCF PECS.

#### Screenshots:

Screenshots of the entire questionnaire from their CATI interview (both English and Spanish) must be submitted. The full question wording and answer categories must be visible.

## Data Review

The PCF PECS Team will review XML data files submitted by each vendor. Both interim and final files are reviewed immediately upon submission for proper formatting, completeness, accuracy of record count, and out-of-range and missing values. XML files which fail this immediate review are not captured by the PCF PEC System. As stated in ***Section 7.4, XML File Quality Control Procedures***, vendors are required to download and use the Schema Validation tool on every XML file prior to its submission. This tool will help vendors pinpoint errors and correct them prior to submission.

Once the data files are captured by the system, the PCF PECS Team will run a series of edits on submitted data to check for such issues as outliers, patterns, or unusual data elements. The PCF PECS Team will attempt to assist any vendors experiencing trouble with their submissions and resolve any data issues detected. Conference calls or email exchanges with the survey vendor will be used for this effort.

* With the interim file deliveries, emphasis will be placed on uncovering and explaining problems, and vendors’ revisions to ensure future data aligns with protocols.
* With the final file deliveries, emphasis will be placed on repair of identified problems and prompt resubmission of the files.

If at any point the PCF PECS Team believes there are any significant issues with a survey vendor’s data, or if repeated discussions and contact with a survey vendor fail to result in cleaner data, a more thorough review of the survey vendor’s data processing and survey implementation activities may be initiated. At that time, RTI may request copies of documentation associated with whatever the data issue is—for example, if out-of-range values are found repeatedly, RTI may request copies of documents showing the training program used to train Data Entry/optical scanning staff, training records, and documentation showing that recommended quality assurance practices associated with data entry/scanning were followed. Survey vendors are expected to comply with all such requests for documentation.

RTI will observe vendor and practice response rates and levels of missing data to detect possible trends or quality problems on the part of any particular vendor.

## Telephone Interviewer Recordings

Vendors must submit recorded time from each interviewer who worked during the first 3 production days of the telephone follow-up effort. Recordings shall consist of:

* For interviewers who have spent time conducting interview:
  + 5 minutes of recorded time contacting sample members AND
  + Minimum of 5 minutes of recorded time during the interview. *Notes: (1) Do not include interviews where the respondent stated they did not want their interview recorded. (2) Interviews conducted in a state where two party consent is required are exempt from this requirement to submit recorded time during the interview.*
* For interviewers who have not spent time conducting interviews:
  + 5 minutes of recorded time contacting sample members.

Recordings shall be submitted to the PCF PECS web portal no later than 7:59 PM ET on the date on which recordings are due. Interviewers should be numerically labeled to allow for identification in the event it is necessary to follow-up on a particular recording, or interviewer.

The PCF PECS Team will evaluate interviewers on politeness to the respondent, voice clarity, proper use of FAQs to answer questions, and (on the interview) accuracy in reading questions, appropriate speed, and proper interviewing procedures. RTI will raise any issues of unsatisfactory interviewer performance with the vendor. Depending on the severity of the issue, coaching, additional training, increased monitoring and re-recording may be advised. If necessary, a Corrective Action Plan (see ***Section 10.7, Corrective Action Plans***) will be put in place. Further details about interviewer recordings will be provided in upcoming PCF PECS announcements.

## Remote Site Visits

Remote site visits for PCF PECS will be conducted to ensure compliance with the PCF PECS requirements. CMS, through its contractor RTI, may also identify vendors for site visits based on any of the following:

* Concerns surfacing during the vendor application process
* Quality issues surfacing during the oversight process (i.e., QAP, mail materials, CATI screenshots, interim data files, telephone interviewer recordings)
* Major or numerous quality issues arising during survey implementation
* As a follow-up after a prior site visit, issue, or Corrective Action Plan

**Notification:** RTI will notify vendors by email, followed by a telephone call if a remote site visit is required for their organization. RTI will convey information about the proposed date, any area(s) of concern, and specific vendor personnel who should be in attendance. RTI and the vendor will schedule the site visit at a mutually agreeable time.

**Remote site visit team:** Generally, the remote site visit team will consist of two to four individuals. The visit will be conducted through multiple video conference calls each of length 3–4 hours. The number of members of the site visit team, and number of conference calls, depends on several factors including the number of PCF PECS practice sites that authorized the survey vendors, the types and severity of issues identified, and whether a subcontractor is used. If a subcontractor is used in a substantial role, the remote site visit can be expected to include at least one video conference call with the subcontractor. Site visits may be conducted after data collection and data submission are complete for the Performance Year.

**Agenda and materials:** Five or more business days prior to the remote site visit, the remote site visit team will send a Site Visit Agenda to the vendor. The agenda will devote most attention to the areas of concern. The agenda will specify the document or other resource the vendor is expected to present during the video conference call(s). Examples of such documents/resources may include but are not limited to:

* a video “walk through” of the physical area used for interviewing, mailing, or data processing
* a document “step through” of the systems and processes used from the point of receiving the sample patient file to preparation of a final data file
* software/programs in downloading and storing the sample patient file
* silent audio (and keystroke if possible) monitoring of interviews and contacting work
* telephone interviewing monitoring logs
* walkthrough of methods used for tracking contacts made and status codes
* documentation and observation related to SPAM flagging
* a review of documentation of the above steps
* interviews with the survey vendor’s key PCF PECS project staff, including the project manager and data manager

**Non-Disclosure Agreement:** All discussions, observations, and materials reviewed during the site visit will remain confidential. RTI acknowledges that certain systems or processes may be proprietary to a survey vendor, full cooperation with the site visit team is expected so that the team may adequately assess survey vendor compliance with all PCF PEC Survey protocols and guidelines. It is for this reason that the RTI Contracts Office requires both the site visit team from RTI and the designated survey vendor staff sign a Non-Disclosure Agreement (NDA). The NDA states that RTI project staff must maintain in confidence or restrict the disclosure of all proprietary information received or observed during the site visit.

**Post-site visit:** After each site visit, RTI will prepare and submit to CMS a *Site Visit Report*, which will summarize the findings from each site visit, including deficiencies and problems observed and remaining (if any). The *Site Visit Report* will also describe corrective actions that the survey vendor will be required to take to correct any deficiencies or problems noted. The PCF PECS Team will provide the survey vendor with the *Site Visit Report* after it has been reviewed with CMS project staff.

## Corrective Action Plans

If a survey vendor, or its subcontractor, fails to demonstrate adherence to the PCF PEC Survey protocols and guidelines, as evidenced by ongoing problems with its submitted data or oversight deliverables, or as observed in an implementation process during a site visit, CMS, through its contractor RTI, may

* notify the vendor that they are being placed on a Corrective Action Plan, or
* notify the vendor that a) their data submissions and oversight deliverables will be given heightened scrutiny and b) they will be given the opportunity to supply additional quality-related documentation. If their performance on PCF PECS is found to be unsatisfactory after these opportunities they will be placed on a Corrective Action Plan.

If the survey vendor is put on a corrective action plan, RTI will determine a schedule by which the survey vendor must comply with the tasks set forth in the corrective action plan. This schedule will include interim monitoring dates, when RTI and the survey vendor will meet via teleconference to discuss the status of the plan and what changes the survey vendor has made or is in the process of making. The nature of the requested changes that the survey vendor is asked to implement will dictate the kind of “deliverables” the survey vendor will be expected to provide and the dates by which the deliverable must be provided. Vendors who have a corrective action plan in place will have the following notation added to PCF’s List of Approved Survey Vendors: (CMS is reviewing [vendor’s name]’s vendor approval status).

Survey vendors that fail to comply with the corrective action plan may be subject to having their “approved” status rescinded. The affected PCF practice site(s) will be notified of their survey vendor’s loss of approval due to their failure to comply with oversight activities or unsatisfactory implementation.

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Appendix A: Minimum Business Requirements

Appendix B: Vendor Application

Appendix C: Teaser Postcard

Appendix D: Mailout #1

Appendix E: Reminder Postcard

Appendix F: Mailout #2

Appendix G: CATI Script English

Appendix H: CATI Script Spanish

Appendix I: Frequently Asked Questions from Sample Members for Use by Telephone Interviewing/Inbound Help Desk

Appendix J: General Guidelines for Telephone Interviewers

Appendix K: Exceptions Request Form

Appendix L: Discrepancy Notification Form

Appendix M: Poster

Appendix N: Waiting Room FAQs

Appendix O: Model Quality Assurance Plan Outline

1. The AAPOR website at <https://www.aapor.org/Standards-Ethics/Institutional-Review-Boards/Additional-IRB-Resources.aspx> Exit icon, February 2015. [↑](#footnote-ref-2)
2. The following states currently require two-party or all-party consent when telephone calls are monitored or audiotaped: California, Connecticut, Florida, Illinois, Maryland, Massachusetts, Montana, New Hampshire, Pennsylvania, and Washington. [↑](#footnote-ref-3)