

DATE: 3/18/24

TO: All Programs of All-Inclusive Care for the Elderly (PACE) Organizations

SUBJECT: Information for PACE Organizations Regarding Staff Involvement in HOS-M Survey Administration

The Medicare Health Outcomes Survey-Modified (HOS-M) annually assesses the frailty of the population in PACE organizations in order to adjust plan payment rates. Eligibility for payment purposes is based on community-residing participants who do not have end-stage renal disease (ESRD) and are 55 or over. All PACE organizations with Medicare contracts in effect on or before January 1st of the previous year and minimum enrollment of 30 members by February 1 of the current year are required to report the HOS-M survey and data are used to calculate annual frailty adjustment factors. Ahead of the 2024 HOS-M survey administration, the HOS-M Project Team would like to remind PACE organizations about permissible and non-permissible PACE organization staff involvement in the administration of the HOS-M survey.

Permissible PACE Organization Involvement in the HOS-M Survey

PACE organizations are encouraged to publicize the survey to their members and staff and may remind members to return completed surveys to their survey vendors. PACE organizations may also answer questions from participants, families, or caregivers regarding the survey's legitimacy and purpose. Staff may serve as proxies or assist a member in completing the HOS-M survey at the request of a member or their family or caregiver.

Limitations to PACE Organization Involvement in the HOS-M Survey

PACE organization staff may **not** engage in activities that interfere with survey operations or in any way jeopardize the anonymity or voluntary nature of the HOS-M survey. Such prohibited activities include, but are not limited to:

- Tracking which PACE organization members received or completed the HOS-M survey.
- Providing survey vendors with lists of PACE members that did not receive the HOS-M survey.
- Contacting survey vendors or RTI, CMS's HOS-M Contractor, to ascertain which PACE organization members are in the HOS-M survey sample.
- Contacting survey vendors or RTI to confirm if a member received or returned a HOS-M survey to the survey vendor.
- Requesting to complete the HOS-M on behalf of a member or calling survey vendors to arrange telephone interviews for a member.
 - **Note:** PACE staff may assist a member in completing the survey by mail or phone **only** if a member or a family member requests assistance to do so.
- Requiring PACE members to complete the HOS-M survey or offering incentives for completion.
- Copying another member's blank survey and distributing it to a member who misplaced their survey.
 - **Note:** Members that misplace their survey can contact the survey vendor to receive a replacement survey. PACE staff may assist the member in requesting a new survey if the member or family member specifically requests assistance.

Additional information on PACE organization roles and responsibilities as well as on the HOS-M survey administration were provided during the PACE Organization Webinar hosted by RTI in March 2024.