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TO: All Medicare Advantage Organizations and Section 1876 Cost Plans

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SUBJECT: Medicare Health Outcomes Survey (HOS) Outcome Measures Moved to Display for 2022 and 2023 Star Ratings

In March 2020, CMS announced via the Interim Final Rule with Comment (CMS-1744-IFC) that the 2020 HOS data collection would be delayed due to survey vendor safety concerns related to the COVID-19 public health emergency (PHE). A subsequent HPMS memo, “2020 Medicare Health Outcomes Survey (HOS) and HOS-Modified (HOS-M),” dated July 20, 2020, announced HOS fielding would commence in mid-August and CMS would continue to monitor the situation to determine if any additional adjustments to the HOS needed to be implemented. While the HOS data collection was completed as scheduled in fall 2020, it has since become apparent that the COVID-19 PHE significantly impacted the validity of the two HOS outcome measures currently used in the Star Ratings.

The two HOS outcome measures, *Improving or Maintaining Physical Health* and *Improving or Maintaining Mental Health*, are unique in that they assess an MA contract’s ability to improve or maintain the physical and mental health of its enrollees over time, based on baseline and follow-up survey data collected at the beginning and end of a two-year period. The statistical models underlying the two measures can validly and accurately measure contract quality only if changes in physical and mental health status and mortality are affected strictly by the quality of care that contracts deliver and by predictors in the models. Specifically, these measures rely on models to predict expected changes in physical and mental health status and mortality from baseline to follow-up, based on relative contract performance. However, data collected for these measures during the COVID-19 PHE also reflect significant and disparate effects of COVID-19 on enrollees’ physical and mental health status and mortality which CMS is unable to accurately isolate or control for within the statistical models underlying these two measures. Thus, the validity of the models is compromised and CMS is unable to accurately measure change in beneficiary health status over time for these two measures. By comparison, the cross-sectional HEDIS measures derived from the HOS¹ will be reported as usual in the 2022 and 2023 Star

¹ The HEDIS measures derived from the HOS include *Monitoring Physical Activity*, *Reducing the Risk of Falling*, and *Improving Bladder Control*.

Ratings because these are process measures, collected at one point in time, and their calculation is not affected by the statistical modeling issue caused by the pandemic.

As specified at 42 CFR § 422.164(b), CMS reviews “the accuracy, reliability, and validity of measures and performance data before making a final determination about inclusion of measures in each year's Star Ratings.” In effect, this regulation authorizes CMS to remove a measure from the Star Ratings if data validity issues are identified. Due to the pervasive way in which COVID-19 has undermined and will continue to undermine the validity of the two HOS outcome measures for the 2020 and 2021 follow-up measurement periods, CMS will calculate the 2022 and 2023 Star Ratings without the use of *Improving or Maintaining Physical Health* and *Improving or Maintaining Mental Health*.

We will move *Improving or Maintaining Physical Health* and *Improving or Maintaining Mental Health* to the display page on CMS.gov with a note that the comparisons are pre- and post-pandemic and that the measures are not being included in the 2022 and 2023 Star Ratings due to validity concerns related to the COVID-19 PHE. Beneficiary-level data will also be provided to contracts for use in quality improvement and to help MA contracts better understand the impact of the pandemic on Medicare beneficiaries’ physical and mental health. Information on how to request contract-specific HOS data is included in the HPMS memo entitled “2021 Medicare Health Outcomes Survey (HOS) HPMS Update and Availability of HOS and HOS-Modified (HOS-M) Reports and Data.”

For questions about the HOS, please contact HOS@cms.hhs.gov. Questions about Star Ratings should be directed to PartCandDStarRatings@cms.hhs.gov.