



## American Association on Health & Disability

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**AAHD** - Dedicated to better health for people with disabilities through health promotion and wellness



# LAKESHORE

August 15, 2017

To: National Quality Forum

Re: **Public Comment – Draft Report on Medicaid Innovation**

The American Association on Health and Disability and the Lakeshore Foundation write with observations on the draft NQF Medicaid innovation report.

The American Association on Health and Disability (AAHD) ([www.aahd.us](http://www.aahd.us)) is a national non-profit organization of public health professionals, both practitioners and academics, with a primary concern for persons with disabilities. The AAHD mission is to advance health promotion and wellness initiatives for persons with disabilities.

The Lakeshore Foundation ([www.lakeshore.org](http://www.lakeshore.org)) mission is to enable people with physical disability and chronic health conditions to lead healthy, active, and independent lifestyles through physical activity, sport, recreation and research. Lakeshore is a U.S. Olympic and Paralympic Training Site; the UAB/Lakeshore Research Collaborative is a world-class research program in physical activity, health promotion and disability linking Lakeshore's programs with the University of Alabama, Birmingham's research expertise.

Specifically

**Where are the beneficiary-participant-consumer-patient engagement measures?**

A frustration with the excellent work of the NQF is the frequent inability to cross-reference other NQF projects. For example, in its March 15, 2017 NQF MAP report to HHS & CMS, 6 “high value measures” are identified and explained. Two of the 6 are patient-reported outcome measures and measures addressing the patient experience. These patient-beneficiary-participant-consumer experience measures are generally missing from the Medicaid innovation report.

The NQF Medicaid innovation report acknowledges the CAHPS HCBS Experience Survey and includes the National Core Indicators (NCI) survey managed by NASUAD. But other CAHPS surveys are largely not discussed. The NCI managed by NASDDDS is not included. Personal Outcomes Measures by CQL is not discussed. The ECHO is not discussed. The Medicaid innovation report needs a much greater cross walk with the NQF MAP recommendations and NQF work on beneficiary-participant-consumer-patient measures, and how they apply to Medicaid and Medicaid innovation.

### **Community Integration Through Community-Based Long Term Services and Supports – pages 23-28**

The Medicaid innovation report identifies and discusses many important topics such as: Population Diversity within the CB-LTSS program – page 24; Measures focused on the medical component, and not on quality of life nor community integration & rebalancing – page 24; CAHPS HCBS Experience Survey – pages 25-27; and National Core Indicators administered by NASUAD – pages 27-28 and 75.

### **Physical and Mental Health Integration – pages 28-38**

The Medicaid innovation report makes helpful observations about barriers – pages 28-29; acknowledges too many process measures and few outcome measures – page 29; and includes (PACT) Programs for Community Assertive Treatment, as a measure concept – page 38.

Thank you for the opportunity to comment. If you have any questions please contact Clarke Ross at [clarkross10@comcast.net](mailto:clarkross10@comcast.net).

Sincerely,



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Member, National Quality Forum (NQF) workgroup on persons dually eligible for Medicare and Medicaid (July 2012-July 2017) and NQF population health task force (2013-2014) (<http://www.qualityforum.org/>) and NQF representative of the Consortium for Citizens with Disabilities (CCD) Task Force on Long Term Services and Supports ( <http://www.c-c-d.org/>). 2017 member, NQF MAP workgroup on Medicaid adult measures. 2016-2017 NQF duals workgroup liaison to the NQF clinician workgroup. 2015-2016 and 2014-2015 NQF duals workgroup liaison to the NQF PAC/LTC workgroup. Member, ONC (Office of the National Coordinator for Health Information Technology) Health IT Policy Committee, Consumer Workgroup, March 2013-November 2015; Consumer Task Force, November 2015-April 2016. (<http://www.healthit.gov/policy-researchers-implementers/federal-advisory-committees-facas/consumer-empowerment-workgroup>). Member, SAMHSA Wellness Campaign National Steering Committee – January 2011-September 2014. (<http://promoteacceptance.samhsa.gov/10by10/>).

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