



American Association on Health & Disability

110 N. Washington Street Suite 328-J Rockville, MD 20850

T. 301-545-6140 F. 301-545-6144 www.aahd.us

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



LAKESHORE

March 27, 2018

Re: Medicare Special Needs Plans for Persons Dually Eligible for Medicare and Medicaid

RE: CMS MMCO March 13, 2018 Request for Stakeholder Input

RE: Comments on Section 50311

TO: MMCOCapsmodel@cms.hhs.gov

Dear MMCO colleagues:

The American Association on Health and Disability and the Lakeshore Foundation appreciate the opportunity to provide comments on the Special Needs Plans for Persons Dually Eligible for Medicare and Medicaid.

The American Association on Health and Disability (AAHD) (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) 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.

Reference and Context

In July 2012, the Consortium for Citizens with Disabilities (CCD) Task Force on Long-Term Services and Supports (LTSS) identified six gaps in existing quality standards as they directly relate to persons with disabilities and persons dually eligible for Medicare and Medicaid. Two were/are:

1. Consumer Choice and Participant-Directed Services
2. Satisfaction: Individual Experience with Services and Supports

In its July 12, 2013 National Quality Forum (NQF) to CMS Preliminary Findings report on quality measures and persons dually eligible for Medicare and Medicaid, reaffirmed in the February 28, 2014 NQF Interim Report to CMS, and further reaffirmed in 2015 & 2016 NQF reports to CMS on persons dually eligible for Medicare and Medicaid) – 7 High Priority Measure Gaps for Persons Dually Eligible for Medicare and Medicaid were identified, explained, and shared. Three of these were/are:

1. Shared decision-making
2. Beneficiary sense of control/autonomy/self-determination
3. Community integration/inclusion and participation

Proposed D-SNP Idea and Approach

To reduce the need for grievance and appeals and as a possible D-SNP integration standard, each eligible D-SNP shall implement, depending on the demographic population of their beneficiaries, as it relates to persons with disabilities, one of the following:

1. National Quality Forum endorsed, AHRQ trademark, Home and Community-Based Services (HCBS) Experience of Care Survey (part of the CAHPS – Consumer Assessment of Healthcare Providers and Systems – series); or,
2. National Core Indicators; or
3. Personal Outcome Measures; or
4. The Experience of Care and Health Outcomes (ECHO), an AHRQ trademark and part of the CAHPS – Consumer Assessment of Healthcare Providers and Systems – series).

Thank you for the opportunity to comment. Thank you for your consideration. If you have any questions please contact Clarke Ross at clarkerossl0@comcast.net.

Sincerely,

E. Clarke Ross

E. Clarke Ross, D.P.A.

Public Policy Director
American Association on Health and Disability
clarkeross10@comcast.net
Cell: 301-821-5410

Member, National Quality Forum (NQF) workgroup on Medicaid adult measures (December 2017-present). 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/>).

Roberta S. Carlin, MS, JD

Executive Director
American Association on Health and Disability
110 N. Washington Street, Suite 328J
Rockville, MD 20850
301-545-6140 ext. 206
301 545-6144 (fax)
rcarlin@aahd.us

Amy Rauworth

Director of Policy & Public Affairs
Lakeshore Foundation (www.lakeshore.org)
4000 Ridgeway Drive
Birmingham, Alabama 35209
205.313.7487
amyr@lakeshore.org