



## 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

July 16, 2021

### **Re: NQF - Developing and Testing Risk Adjustment Models for Social and Functional Status Related Risk Within Healthcare Performance Measurement**

Submitted through the NQF report comment portal:

The American Association on Health and Disability and the Lakeshore Foundation appreciate the opportunity to provide comments.

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. AAHD is specifically dedicated to integrating public health and disability into the overall public health agenda.

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.

Our comments reinforce and support three of the draft report observations and recommendations.

1. RE: 9 recommended core principles – pages 7 & 8. We reinforce the over-riding importance of core principle #2 – disparities should be identified and reduced
2. RE: Medicare and Medicaid dual eligibility as an important proxy for the underserved and challenged populations – page 12. As a 2012-2017 member of the NQF workgroup on persons dually eligible for Medicare and Medicaid, there is an abundance of data and information on the burden faced by these persons and the systems and providers that serve them. We reinforce the importance of this recommendation.
3. Recommended Minimum Standard – page 12: “At a minimum, developers should consider age, gender, race/ethnicity, urbanicity/rurality, Medicare and Medicaid dual eligibility, indices of social vulnerability, and markers of functional risk (frailty, ADLs, IADLs).” We reinforce this minimum standard. We also bring to the NQF attention:

2000-2021 recommendations of the Consortium for Citizens with Disabilities (CCD), Disability and Rehabilitation Research Coalition (DRRC); and Trust for America’s Health (TFAH) led public health reporting collaborative: demographic data collection, analysis, and public sharing should “include in every measure by emphasizing the importance of stratification and cross-tabulation of data by race, ethnicity, disability status, age, sex, sexual orientation, gender identity, race, ethnicity, primary language, rural/urban environment, and service setting for all core measures.”

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,



**E. Clarke Ross, D.P.A.**

Public Policy Director

American Association on Health and Disability

[clarkross10@comcast.net](mailto:clarkross10@comcast.net)

Cell: 301-821-5410

National Quality Forum (NQF) Involvement includes: Medicare Hospital Star Ratings Technical Expert Panel (June-November 2019 and September-October 2020); workgroup on Medicaid adult measures (appointed December 2017); Medicaid-CHIP Scorecard Committee (appointed October 2018); Measure Sets and Measurement Systems TEP (June 2019-August 2020); workgroup on persons dually eligible for Medicare and Medicaid (July 2012-July 2017); and NQF population health task force. Clarke was the NQF representative of the Consortium for Citizens with Disabilities (CCD) Task Force on Long Term Services and Supports (2012-2017). Dr. Ross was the 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.

Clarke is the AAHD Representative to the CMS-AHIP-NQF Core Quality Measures Collaborative (2019-present).

**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](mailto:rcarlin@aahd.us)

**Amy Rauworth**

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