



# American Association on Health & Disability

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



# LAKESHORE



No Health without Mental Health  
www.nhnh.org • 501(c)(3) organization

July 27, 2021

## **Re: NQF – Addressing Opioid-Related Outcomes Among Individuals with Co-Occurring Behavioral Health Conditions – June 24, 2021 Draft Report - Comments**

Dear National Quality Forum Colleagues:

The American Association on Health and Disability, the Lakeshore Foundation, and No Health without Mental Health appreciate the opportunity to provide comments. We write supporting the page 17 Figure 1 – Measurement Framework To Address Overdose and Mortality Resulting From Polysubstance Use Among Individuals with Co-Occurring Behavioral Health Conditions. Each of the domains and subdomains are important. Our comments are to suggest further explanations, emphases, and expanded elements within the figure.

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.

NHMH - No Health without Mental Health ([www.nhmf.org](http://www.nhmf.org)) is a federally-qualified patient advisory nonprofit with a mission to make effective evidence-based behavioral health services widely available in medical settings. Established in 2007, with offices in San Francisco, CA and Arlington, VA, NHMH engages in health policy advocacy to advance behavioral integration and patient education. NHMH has been a participant in 2 PCORI large pragmatic clinical trials both testing approaches integrating psychiatric treatment for common and complex behavioral conditions in rural primary care settings, through tele-collaborative care and through tele-enhanced referral. NHMH has also been a participant in a New York State DSRIP demonstration project assisting diverse primary care practices in integrating mental health services in their small-to-medium size practices.

### **Comments on the NQF Domains & Subdomains:**

1. Domain of Equitable Access: "Financial Coverage of Services." We suggest two new important elements: (a) health insurance "parity" requirements, application, and implementation, as well as affordable, coverage for health plan enrollees and patients; and (b) adequate payment rates for providers, including behavioral health providers working in general health/medical care settings.
2. Domain of Clinical Interventions: We strongly agree with need for evidence-based care and measurement-based care, both absolute essentials. We suggest two additional possible elements: (a) tracking medical and behavioral health interventions and patient symptom status via electronic medical records (EMRs); and, (b) shared/integrated treatment plans by general health/medical and behavioral health providers.
3. Domain of Integrated/Comprehensive Care: numerous regional and national studies demonstrate the critical function of care/case managers in providing effective integrated medical-behavioral healthcare. We suggest two additional elements: (a) ensuring adequacy of training in integrated care for CMs; and (b) ensuring sufficient time for CMs to perform the tasks of liaising with general health/medical and behavioral health providers.
4. Domain of Vulnerable Populations: an important component is the recognition, measurement, and response to Social Determinants of Health (SDOH) and coordinated/integrated community resources access.
5. Domain of Person-Centered Care: please define and discuss using the NQF July 31, 2021 Person-Centered Planning and Practice final report.

We hope these suggestions are helpful clarifications and expansions to the excellent diagram.

Thank you for the opportunity to comment. If you have any questions please contact Clarke Ross at [clarkeross10@comcast.net](mailto:clarkeross10@comcast.net).

Sincerely,



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**National Quality Forum (NQF)** Member, NQF Measure Applications Partnership (MAP) Coordinating Committee (July 2021-present); NQF Medicare Hospital Star Ratings Technical Expert Panel (June-November 2019 and September-October 2020); workgroup on Medicaid adult measures (appointed 2016 and 2017); Medicaid-CHIP Scorecard Committee (appointed October 2018); and Measure Sets and Measurement Systems TEP (June 2019-August 2020). 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/>). 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. AAHD Representative to the CMS-AHIP-NQF Core Quality Measures Collaborative (CQMC) (2019-present).

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