



American Association on Health & Disability

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



LAKESHORE



SOLUTIONS TO ADVANCE HEALTH

April 22, 2022

**Re: NQF Committee on Primary Care and Chronic Illness:
Measure #3667 – Days at Home for Patients with Complex, Chronic
Conditions**

The American Association on Health and Disability, Altarum, and the Lakeshore Foundation appreciate the opportunity to provide comments. We write to support the measure recommended by the NQF committee.

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

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.

Altarum is a nonprofit health services research organization (www.altarum.org) that helps federal and state health agencies and foundations improve health equity and outcomes through better systems of care, primarily for disenfranchised populations. Altarum strives to produce solutions that go beyond being road maps for improvement; rather they serve to catalyze, accelerate and implement innovations.

Measure #3667: Days at Home for Patients with Complex, Chronic Conditions

A core tenet of the disability rights movement, enshrined in the Americans with Disabilities Act (ADA) and *L.C. v. Olmstead*, is that people with disabilities of all ages have a right to receive services and supports in the most integrated setting, regardless of the source of payment for services or the intensity of their service needs. Most people far prefer to age in their homes, and research has shown that individuals who receive needed services in their communities – including individuals with the most complex intellectual disabilities who require the most substantial supports -- experience improved quality of life.

The Consortium for Citizens with Disabilities (CCD) and the Disability and Aging Collaborative (DAC) address the services and supports that enable older adults and individuals with disabilities of all ages to live in their homes and communities. We are CCD and DAC members, and Altarum is also a DAC member. In particular, these coalitions focus on the Medicaid Home and Community-Based Services (HCBS) program, recognizing that HCBS is the key to community integration, full participation, independent living, and economic self-sufficiency for many people with disabilities and older adults. These critical services make it possible for people with disabilities and older adults to fully exercise their civil and human rights.

NQF Measure #3667 is an innovative provider group-level measure of days at home or in a community setting. It is stewarded by CMS and is a Yale Center for Outcomes Research and Evaluation (CORE) measure. The proposed measure is focused on Medicare fee-for-service (FFS) beneficiaries with complex chronic conditions, and the level of analysis is the Accountable Care Organization.

This measure is coming forward at a key moment, as the U.S. health care system moves further toward provision of multiple services in home and community-based settings (other than for specialty care in hospitals and medical centers). NQF Measure #3667 therefore has outsize public policy significance, given that it is poised to set an important precedent for analyzing provider performance in the context of person-centered care. The disability and aging communities have been promoting HCBS services and programs for decades as desired alternatives to institutional settings and as strategies for “rebalancing” Medicaid and other public program financing away from institutions. To fully realize these approaches requires dissemination and use of a meaningful quality metric that measures how providers fare in

keeping their patients and clients out of medical institutions. Measure #3667 now being considered for use through Medicare and ACOs, is a clear recognition that the larger health care system is moving to meaningfully promote the objectives of home and community living. We therefore urge NQF to approve the measure, and to move work forward that will measure what matters to millions of people who need and want their medical care to help them return home as soon as possible, and to remain there for as long as possible, with appropriate support services if required.

In closing, the disability and aging advocacy and research communities are committed to supporting quality measurement experts whose work aims to expand funding and programming for care in HCBS settings. We are heartened to see Congressional proposals being considered that would further incentivize HCBS services and supports, and we believe that if approved, NQF Measure #3667 would strengthen and reinforce these trends over time.

Thank you for the opportunity to comment. If you have any questions please contact Clarke Ross at 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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