



American Association on Health & Disability

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



LAKESHORE

May 23, 2024

Re: Discharge from Inpatient Facilities to Home-Based Settings for Medicaid Participants

ScoreCardMeasures@Lewin.Com

Lewin for CMS Public Comment Framing Document

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) 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.

Potential Importance and Usability

Consistent with our membership in the Consortium for Constituents with Disabilities (CCD) and the Disability and Aging Collaborative (DAC) we work together to advocate for Federal public policy that ensures the self-determination, independence, empowerment, integration and inclusion of persons with disabilities in all aspects of society. These coalitions advocate the strongest possible support for person-centered whole-person community-based services and supports. Given other many demands for input, these two coalitions, leaders in Medicaid HCBS issues, are not submitting comments at this time.

AAHD and the Lakeshore Foundation agree with the Lewin premise that the proposed home discharge measure framework is a signal of quality. The measure continues the momentum to break down silo walls between discrete funding sources and discrete service settings, and the siloed public systems that fund and sponsor these activities. We believe that the proposed measure framework will assist in the effective and appropriate implementation of the Medicaid HCBS program.

We particularly are supportive of the application to and inclusion of persons dually eligible for Medicare and Medicaid in the proposed measure framework – an incremental step to better integrating services and supports for this population.

We would like to remind the Lewin team of other related measures that reinforce the intent of this Lewin framing document:

1. Mathematica for CMS – Medicaid and CHIP Core Quality Measures: 2022 meeting: rejected - LTSS (Including HCBS) Care Plan Transmitted to the Patient's Primary Care Practitioner. [And Primary Care Record shared with LTSS/HCBS providers]. This is an effort to promote person-centered whole health integration,
2. Cross-Setting LTSS Discharge [MUC2022-83,85,86,87]; Home Health Discharge to the Community [02943 and 02944]; Functional Assessments and Care Plans in LTSS discharge [05853]. NQF MAP consideration. These are measures directly relevant to the Lewin framing document.

Thank you for the opportunity to comment. If you have any questions please contact Clarke Ross at clarkross10@comcast.net.

Sincerely,



E. Clarke Ross, D.P.A.

American Association on Health and Disability
And
Lakeshore Foundation

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Clarke Ross served on the National Quality Forum (NQF) Measure Applications Partnership (MAP) Coordinating Committee (July 2021-March 2023); NQF TEP on Social and Functional Risk Adjustment Within Quality Measurement (April 2022-December 2022); NQF Medicare Hospital Star Ratings TEP (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). Clarke was a member of the NQF workgroup on persons dually eligible for Medicare and Medicaid (July 2012-July 2017) and NQF population health task and was the NQF representative of the Consortium for Citizens with Disabilities (CCD) Task Force on Long Term Service (2012-2017). Clarke served as 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 serves on the National Committee for Quality Assurance (NCQA) Consumer Advisory Council and serves on two committees of the Core Quality Measure Collaborative (CQMC).

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Effective June 1 – Roberta retires and Karl is the AAHD executive director
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