



American Association on Health & Disability

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



LAKESHORE

**February 20 submission for: February 22, 2024 Member Issues of Focus;
NCQA Consumer Advisory Council**

Four AAHD-Lakeshore federal policy issue priorities:

1. Overcoming and Linking Program Silos for Persons with Co-Occurring Chronic Conditions:

Including persons with Co-Occurring Mental Illness and Substance Abuse Disorder; Persons with Co-Occurring Mental Illness and Chronic Medical Conditions; Persons with Co-Occurring Mental Health and Intellectual and Other Developmental Disabilities; Persons with Co-Occurring Behavioral Health Conditions and Disabilities; Persons with Co-Occurring Disabilities and Chronic Health Conditions.

This includes the **effective and meaningful bi-directional integration of behavioral health, general health, and primary care** – a NCQA priority activity.

2. Medicaid Home-and-Community-Based Services (HCBS) – Expanding the statutory authority status (from waiver to state plan benefit), increasing dedicated resources; strengthening work force and family care givers.

In 2019, 7.8 million persons received Medicaid Home-and-Community-Based Services. [Mathematica for CMS. “Medicaid Beneficiaries Who Use Long-Term Services and Supports, 2019.” July 22, 2023]. Of these persons, 1.9 million were served through the Section 1915 © program. [CMS. “Medicaid Section 1915 © Waiver Programs Annual Expenditures and Beneficiaries Report,” June 9, 2023.] Nationally, 3 million people received HCBS services through Medicaid waiver programs. [Kaiser Family Foundation, “Medicaid Home-and-Community-Based Services: People Served and Spending During COVID-19, May 4, 2022.] [The variety of Medicaid HCBS state plan benefits and waiver options offered by states is documented in MACPAC. “Access To Home-and-Community-Based Services,” chapter 4, MACPAC June 2023 meeting book.] Many of these persons are dually eligible for Medicare and Medicaid.

3. Meaningful recognition, documentation, and responsiveness to health-related social needs (social drivers of health; social determinants of health – SDOH) – a NCQA priority activity.

4. Enhancing the Employment Status, Benefits, and Official Recognition of Non-Traditional Workers – Community-Based; Lived Experience Framework - community-based, non-medical credentialed, and a lived-experience framework serving persons with disabilities, aged individuals requiring long-term services and supports (LTSS), persons with mental illness and substance use disorder, persons served in the Medicaid home-and-community-based services (HCBS) programs, and persons with co-occurring conditions including those with chronic health conditions.

Community Workers include: (a) Consortium for Constituents with Disabilities (CCD) advocated DSPs (Direct Support Professionals) and Medicaid HCBS workforce; (b) Disability and Aging Collaborative (DAC) advocated LTSS workforce, including Medicaid HCBS; (c) Mental Health Liaison Group (MHLG) advocated MH/SU peer support workers (peer support specialists); and (d) National Community Health Worker Policy Working Group (convened by NACHW and Partners in Health-US; first meeting was February 15, 2024.)

**Quality Measures That Reinforce the 4 Federal Policy Issues Above:
[Where CMS Quality Measurement Contractors Said No]**

1. Sharing care plans between primary care and HCBS providers.

Attached: Mathematica for CMS (Medicaid and CHIP Core Quality Measures), July 2022.

2. **Engagement in Community-Based Mental Health Care after a Mental Health Hospitalization**
 - a. Attached: Battelle PQM February 2024: rejected the measure developed by the NY OMH from the population health measures portfolio.
 - b. CMQC 2023 considered #3590 – Continuity of Care After Receiving Hospital or Residential SUD treatment
3. **Health-Related Social Needs**

Social Needs Screening and Intervention
Attached: Mathematica for CMS (Medicaid-CHIP Core Quality Measures), February 7, 2024; did not endorse the measure as a core measure. [a NCQA priority activity.]

**Quality Measures That Reinforce the 4 Federal Policy Issues Above:
[Being Considered By/Advocated To AHRQ and CMS and Its QM
Contractors]**

4. **Discharge from Inpatient Setting to Home-Based Settings**
 - c. Attached: Lewin Group May 2023 – pending – not publicly announced.
 - d. [Two Medicaid-CHIP Core 2024 Measures: Follow-up from Hospital Placement (a) one for mental illness; (b) second for SUD; (c and d) one for ages 6-to-17, other for ages 18 and older].
 - e. [Two Medicaid-CHIP Core 2024 Measures: Follow-up from Emergency Department discharge (a) one for mental illness; (b) second for SUD; (c and d) one for ages 6-to-17, other for ages 18 and older.]
 - f. At issue – operational definition of “follow-up.”
5. **Primary Care Continuity of Care Measure; Primary Care Comprehensiveness of Care Measure** – American Board of Family Medicine
[Attached: ABFM primary care measures – continuity of care; and, comprehensiveness of care; February 20, 2024 web posting.]
 - a. The Mathematica for CMS Medicaid core quality measures includes a NCQA measure: LTSS comprehensive plan and annual updates.

- b. NCQA considering and developing - Bi-directional behavioral health integration measures.
6. **Patient-Reported Outcome-Performance Measures (PRO-PM):**
- a. AHRQ CAHPS – Now developing a Mental Health CAHPS, separate surveys for inpatient and community settings.
 - b. AHRQ HCBS CAHPS – now being implemented; NCI and POMs also being implemented now.
 - b. Attached - American Board of Family Medicine primary care - trust in physicians; and, person-centered primary care measures

Attachments:

1. Community-Based Mental Health After Hospitalization – Battelle PQM – February 2024.
2. Discharge From Inpatient To Home-Based Settings – Lewin for CMS - May 2023.
3. Sharing LTSS Plan with Primary Care – Mathematica Core for CMS – April and July 2022.
4. Social Needs Screening and Intervention – Mathematica Core for CMS – February 2024.
5. ABFM Primary Care – Continuity-PROs-Comprehensiveness – February 20 2024 web site posting.

Sincerely,



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And

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