



American Association on Health & Disability

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



LAKESHORE

March 12, 2024

The National Committee for Quality Assurance (NCQA)
1100 13th Street, NW, Third Floor
Washington DC 20005
[Public Comments - NCQA](#)

Re: Comment on Proposed Changes to Existing Measures: Follow-Up After Emergency Department Visit for Mental Illness (FUM) and Follow-Up After Hospitalization for Mental Illness (FUH)

Dear NCQA staff and leadership:

The American Association on Health and Disability and the Lakeshore Foundation appreciate the opportunity to provide comments. We write to reinforce comments submitted by organizations of the Mental Health Liaison Group (MHLG), led by Mental Health America (MHA), which we signed.

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.

The MHA-MHLG organizations letter recommended:

1. **Add diagnoses to the denominator to include all relevant ED visits or hospital stays.**
2. **Do not adopt the change to follow-up to hospitalization for mental illness to allow care by any care provider, rather than by a mental health provider only.**

AAHD and Lakeshore would clarify this recommendation: Given the significant shortage of behavioral health providers and the growing behavioral health competence of some non-behavioral health providers (such as primary care practices with inter-disciplinary teams and community health centers), NCQA should consider a few possible alternative expansions. Consistent with the MHLG/MHA recommendation, the measure should only apply to providers with a **documented experience** of serving persons with mental illness and/or substance use, such as advanced primary care practices and FQHCs with documented experience. We realize that documenting experience is an additional workload factor to providers, health plans, and NCQA – but only such documentation will ensure that providers have the experience, competence and skill necessary to make these measures meaningful.

3. **Finalize a proposal to expand follow-up services to include peer support specialists, among other providers.**

The MHLG/MHA letter cites studies that specifically documents that peer support services reduce hospital admissions and readmissions. Peer support services have long been recognized as an evidence-based service. The letter urges NCQA to use a clear definition of peer support and peer support specialists and refers NCQA to: SAMHSA, “National Model Standards for Peer Support Certification,” June 2023.

Thank you for the opportunity to comment. If you have any questions, please contact Clarke Ross at clarkeross10@comcast.net. Member, NCQA Consumer Advisory Council.

Sincerely,



E. Clarke Ross, D.P.A.

American Association on Health and Disability
And
Lakeshore Foundation

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