



# American Association on Health & Disability

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



# LAKESHORE

**November 7, 2024 Member Focus: Health Care Quality and Measurement;  
NCQA Consumer Advisory Council**

## **Organizational Health Care Quality and Measurement Priorities:**

### **1. Medicaid Home-and-Community-Based Services (HCBS)**

Medicaid HCBS annually serves between 4 million (Kaiser Family Foundation, August 14, 2023) to 7.5 million (Mathematica, July 22, 2022) persons. Annual Medicaid HCBS expenditures were \$88 billion in Fee-For-Service HCBS in 2021 and \$30.9 billion in Managed LTSS in 2019 (MACPAC, June 15, 2023).

May 2024: CMS published Ensuring Access To Medicaid Services final rule which required all states to start reporting on HCBS core quality measures in 2028 (building on prior July 2022 and April 2024 CMS announcements). States must use one or more of four experience of care surveys: CAHPS HCBS; NCI-IDD; NCI-AD; POM. States are required to establish performance targets, strategies, and the actual QMs used.

All parties, particularly beneficiaries, their families, and advocates, would like to see (and have the opportunity to provide public comments) state

works-in-progress on initial and draft targets, strategies, and actual quality measures used.

Additionally, in the name of inclusion, integration, and continuity of care, the Medicaid HCBS QM set should consider the June 19, 2024 publicly announced and October 17 webinar delivered AHRQ announced CAHPS Outpatient Mental Health Survey.

## **2. Continuity of Services/Supports/Care, Including Integrated Individualized Supports (including the umbrella of Patient-Reported Outcomes, PROs)**

Challenge: Overcoming and Linking Program Silos for 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.

Building Patient-Centered Primary Care, Including Bi-Directional Behavioral Health Integration. The CMS CMMI Advanced Primary Care initiative focuses on six areas of quality measures including chronic conditions, wellness and prevention, person-centered care, behavioral health, and equity. A QM priority should be more meaningful integration measures.

The American Board of Family Medicine (ABFM) has developed four quality measures “that matter to primary care.” Three of these are: continuous patient-physician relationships; person-centered primary care (a PRO measure); and comprehensiveness of care (extent to which primary care practitioners offer a broad range of primary care services). These measures should be more widely and effectively implemented.

Sharing the individual’s long-term services and supports (LTSS) plan of services and supports with the individual’s primary care provider (this is a NCQA HEDIS measure) and sharing the individual’s primary care plan with the LTSS provider. This measure was discussed in April 2022 and rejected in July 2022 as a Medicaid Core Quality Measure (by the Mathematica for CMS Medicaid and CHIP Core Quality Measures advisory committee).

Additionally, in the name of inclusion, integration, and continuity of care, the Medicaid HCBS QM set should consider the June 19, 2024 publicly announced and October 17 webinar delivered AHRQ announced CAHPS Outpatient Mental Health Survey.

NCQA project work will be very helpful with this challenge.

**Overarching Dynamics - All These Efforts Require Robust and Inter-Active Data Systems Using Consistent Operational Definitions of Disability (and including Mental Illness)**

In late 2023 controversy arose over U.S. Census Bureau proposed changes, without consulting the disability field, in asking disability questions. Following the September 30, 2024 U.S. Census Bureau day-long disability stakeholders summit, on October 28 the Census Bureau Director announced that the American Community Survey (ACS) will continue to use the currently inadequate existing disability questions and measures in 2025 and 2026, rather than even more inadequate proposed alternatives (such as the Washington Group Short Set). The entire disability field, federal statistical communities, and federal agencies administering services and supports to persons with disabilities continue to consider and debate census and related disability questions. NCQA project work will be very helpful with this challenge.

Sincerely,



**E. Clarke Ross, D.P.A.**

American Association on Health and Disability  
And  
Lakeshore Foundation

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