



# 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 5, 2025

### **Re: Proposed New HEDIS Measure – Disability Description of Membership**

#### **Proposed New Measures for HEDIS MY 2026**

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](http://www.aahd.us)) is a national non-profit organization founded by 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](http://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.

### **Proposed New HEDIS Measure – Disability Description of Membership**

The American Association on Health and Disability (AAHD) and the Lakeshore Foundation appreciate and support the proposed new HEDIS measure for disability description of membership. We fully agree with NCQA that such a measure will

allow the identification of care disparities, allow for development of appropriate risk adjustments, and allow for the development of targeted quality measures.

At this point in time, given the dynamics and situations, we agree that NCQA should rely on the current American Community Survey (ACS) disability questions. We and NCQA should acknowledge the limitations in the current ACS questions, such as the absence of mental health conditions and communication challenges, and a precise identification of IDD, but given the situation, the current ACS questions are appropriate and consistent with existing federal disability data collection.

We have operational reservations about the age requirement starting at age 15. Public support programs (such as SSI; SSDI; Medicare; Medicaid) typically use age 22-64, under age 22, 65 and over. Consistency with public support programs, particularly given the current situation, is an important factor.

Thank you for the initiative and thank you for your consideration.

American Association on Health and Disability  
And  
Lakeshore Foundation

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