

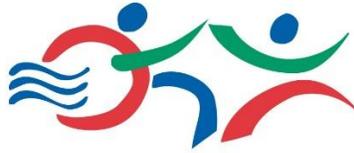


American Association on Health & Disability

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



LAKESHORE

March 4, 2026

Re: NCQA HEDIS Public Comment: Person-Centered Outcome Measures

Submitted through NCQA public comment website:

<https://my.ncqa.org/>

The American Association on Health and Disability and the Lakeshore Foundation appreciate the opportunity to provide comments.

The American Association on Health & Disability (www.aahd.us) is a national cross-disability organization that conducts research, engages the community, and facilitates the development and implementation of programs to advance public health and healthcare policy for the health and wellness of people with disabilities. Through these actions, AAHD is committed to eliminating systemic barriers to healthcare and drive health equity for people across all disabilities, valuing the diverse and intersecting identities within the disability community. AAHD connects people with disabilities, disability advocates, health practitioners, researchers, and policy makers to accessible cross-disability health data and resources—creating a more inclusive society where data-driven healthcare leads to more equitable health outcomes.

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.

NCQA Requested Comment One: Do you support the inclusion of the new PCO measures in HEDIS MY 2027?

YES

Each of the three measures – goal identification; goal follow-up; and goal achievement – should be implemented as soon as possible. They are consistent and reinforcing to measures required by CMS in the Medicaid Home-and-Community-Based Services (HCBS) programs, and in state administered programs serving persons with disabilities and aged persons, as financially supported and promoted by the HHS Administration for Community Living (ACL). They are consistent with goals and expectations promoted for persons with mental illness by HHS SAMHSA (Substance Abuse and Mental Health Services Administration).

The measures should be, and seem to be, generally consistent with:

1. Medicaid HCBS quality measures
2. AHRQ CAHPS HCBS
3. National Core Indicators
4. Personal Outcome Measures
5. American Board of Family Medicine Primary Care Measures – patient-centered measures.

We support the NCQA HEDIS comment page 23 “approach” and pages 23-24 “goal domains.”

We appreciate and value that the NCQA HEDIS PCO has referenced: Centers for Medicare and Medicaid Services (2014). Home and Community-Based Services and 2019 final rule fact sheet. [These have been updated since.]

We appreciate and value that NCQA HEDIS PCO has referenced: National Quality Forum (2020). Person Centered Planning and Practice Final report.

From a consumer/beneficiary/program participant/family perspective, consistency among public programs is an essential objective. We appreciate NCQA PCO measure dissemination to promote consistency, particularly:

1. Presentation-SNP Alliance Fall Forum, October 2025, page 35.
2. Panel Presentation-ADvancing States, August 2025, page 36.
3. Panel Presentation-US Aging, July 2025, page 36.

4. Panel Presentation-Association for Behavioral Health and Wellness, March 2025, page 37.
5. Presentation-Fountain House: Measures That Matter Advisory Committee Meeting, January 2025, page 38.
6. Presentation-AHRQ Person-Centered Planning for Persons with Multiple Chronic Conditions Roundtable Meeting, page 39.

NCQA Requested Comment Two: Should NCQA postpone public reporting of GIA-E until HEDIS MY 2029 to allow for additional time to monitor health plan performance?

NO – no postponement. Person-centered measures are being used in multiple public programs (refer to our answer to requested comment one, above). They should be fully implemented as soon as possible.

NCQA Requested Comment Three: Are there other populations for which the PCO measures would be applicable?

Each of the three measures – goal identification; goal follow-up; and goal achievement - are consistent and reinforcing to measures required by CMS in the Medicaid Home-and-Community-Based Services (HCBS) programs, and in state administered programs serving persons with disabilities and aged persons, as financially supported and promoted by the HHS Administration for Community Living (ACL). They are consistent with goals and expectations promoted for persons with mental illness by HHS SAMHSA (Substance Abuse and Mental Health Services Administration).

[We are not informed about person-centered outcome measures currently used for persons with substance use disorder. We also are not informed about person-centered outcome measures currently used in public programs targeted to appropriately serving persons with co-occurring conditions, such as mental illness-SUD; IDD-mental illness; multiple chronic medical conditions, as examples. We are not substantively informed about person-centered outcome measures in targeted programs serving persons dually eligible for Medicare and Medicaid.] NCQA should explore and inform the measure community and public about use with a variety of populations with substantial service and support needs, including those with complex needs.]

The measures should be, and seem to be, generally consistent with:

1. Medicaid HCBS quality measures
2. AHRQ CAHPS HCBS
3. National Core Indicators
4. Personal Outcome Measures

5. American Board of Family Medicine Primary Care Measures – patient-centered measures.

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.

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And
Lakeshore Foundation

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