July 15, 2016

National Quality Forum

1030 15th Street NW

Suite 800

Washington DC 20005

*Via electronic submission*

Re: Comments on “Addressing Performance Measure Gaps in Home and Community-Based Services to Support Community Living: Priorities for Measure Development,” Interim Report (June 15, 2016)

Dear National Quality Forum:

The American Network of Community Options and Resources, Inc. (ANCOR) is pleased to comment on the 3rd Interim Report of the National Quality Forum Committee on Home and Community-Based Services (HCBS) Quality. This work is critical for the field as we move forward with the implementation of the HCBS rule.

The framework demonstrates thoughtful consideration of areas (domains) potentially intersecting with a person’s day to day life when supported through HCBS waiver funding. This is a huge undertaking, and one requiring a thoughtful approach.

ANCOR offers the following thoughts on the report:

* We commend the committee for the emphasis placed on each of the domains. They bring clarity and broaden the reader’s understanding of a cross disability universe and potentially streamline the work ahead. Some of the domains identified are not currently universally part of systemic protocols used to assess quality across all HCBS waivers.
* One cannot understate the critical importance of a qualified and adequately compensated workforce. These recommendations should be prioritized for rapid development.
* We agree with the Disability and Aging Collaborative (DAC) recommendation on employment to prioritize that states set benchmarks for competitive employment.
* The discussion related to Equity (page 22) broadly addresses issues concerning the allocation of resources but as stated the intent is unclear. Are the recommendations suggesting we shift resources away from long-standing mature systems in favor of building the capacity of other less robust systems? The discussion of resource distribution cannot be understated. There are insufficient resources for all systems and this must be acknowledged as one of the variables. The report should clarify its intent in this section.
* Holistic Health and Functioning (page 23) should address the benefits of integrating primary and specialty care such as behavioral health and other disciplines.

Prioritizing measurement development will be important work going forward. The system will attain what is measured, so identifying the actual measures to be used is critical. The development of measures takes time and while we agree that investments should be made across all domains, this is very unlikely in the short term. ANCOR agrees with DAC that some additional prioritization is needed to guide CMS on the most important areas for measure development. CMS recently released final regulations on Medicaid Managed Care. Within these regulations CMS required for the first time states to include quality measures on *Rebalancing, Community Integration, and Quality of Life*. The Medicaid managed care rules further required the identification of health disparities based on disability status and publicly available External Quality Review reports. Since these areas are now required of states, we believe there is an urgency to invest in measure development and guidance on a menu of measures that could assist states, health plans, and advocates to implement these requirements. While quality of life is not identified as a specific domain or sub-domain, we believe it crosses several domains and is best assessed via the perspectives and experiences of consumers.

We also agree with DAC that development of quality measures related to implementation of the HCBS Settings Rule should be identified as priority areas for measure development. Development of measures could assist advocates and states currently working on transition plans. These include measures within the domains of Choice and Control and Person-Centered Planning and Coordination.

We agree with DAC that the report relies too much on examples from a few states that were explored in the NQF environmental scan. It does not adequately capture existing measures and measure concepts currently in use in MLTSS programs and duals demonstrations. It also would be helpful to identify individual performance measures by domain and sub-domain that could be derived from consumer surveys that are currently in wide use within states. This is in line with the global recommendation to build on existing quality measurement instruments in use. As the report reinforces, we believe the National Core Indicators, National Core Indicators Aging and Disability, HCBS Experience Survey, Money Follows the Person Survey, and Council on Quality and Leadership (CQL) Personal Outcomes Measures are the most promising surveys. The committee should break these surveys down to identify individual performance measures by domain and sub-domain.

We also agree with DAC that CMS should improve administrative data, and the report contains no specific, actionable recommendations for CMS to undertake. We encourage additional discussion and development of specific recommendations for improvements in administrative data.

DAC also recommends that NQF should prioritize the development of measures regarding social connectedness, relationships, and meaningful activity as defined by the individual rather than specific outcomes or activities. For example, many measures of community inclusion ask about whether the individual engages in shopping or eating in restaurants, without recognizing the individual may not actually enjoy those activities. A measure that asks “are you lonely” is a more effective measure of how that individual feels about his or her access to the community and close personal relationships than one that asks questions about specific activities.

ANCOR appreciates the opportunity to provide input. Thank you for the important work you and the committee are undertaking.

Sincerely,

Esme Grant Grewal, Esq.

Senior Director of Government Relations