



American Association on Health & Disability

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



LAKESHORE

April 12, 2020

**Re: National Quality Forum – Draft Behavioral Health Measures Report –
NQF 3538: EMERGENCY DEPARTMENT USE RATE AS A BEHAVIORAL HEALTH
QUALITY MEASURE FOR MEDICAID PATIENTS WITH SMI AND/OR CO-
OCCURRING MEDICAL-BEHAVIORAL CONDITIONS:**

The American Association on Health and Disability and the Lakeshore Foundation appreciate the opportunity to provide comments. We write to offer general support for the comments submitted by No Health Without Mental Health (NHMH). We admire and appreciate the NHMH efforts at promoting the integration of primary care-general health-behavioral health .

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.

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.

Regarding **NQF 3538: EMERGENCY DEPARTMENT USE RATE AS A BEHAVIORAL HEALTH QUALITY MEASURE FOR MEDICAID PATIENTS WITH SMI AND/OR**

CO-OCCURRING MEDICAL-BEHAVIORAL CONDITIONS: AAHD and the Lakeshore Foundation supports the NHMH submission to the NQF: “As a patient advocacy organization working to advance BHI in primary care, NHMH – No Health without Mental Health - understands it may be difficult to tie reduced ED use by this population directly to their receipt of integrated care. It seems to us that addressing both co-morbidities would naturally lead to less need to visit hospital EDs as it is often untreated BH conditions that cause additional avoidable medical expense. That said, for the present we agree with the NQF report that quality measure 3538 should not currently be endorsed as a BH quality measure.”

We further support the NHMH submitted observation: “The subject of primary care’s role in reducing hospital use is complex and more research is needed. Research does show continuity of care by a primary care provider improves patients health status over time.”

Thank you for the opportunity to comment. If you have any questions please contact Clarke Ross at clarkeross10@comcast.net.

Sincerely,



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Member, National Quality Forum (NQF) workgroup on Medicaid adult measures (December 2017-present), Medicaid-CHIP Scorecard Committee (October 2018-present) and Measure Sets and Measurement Systems TEP (June 2019-present). Member, National Quality Forum (NQF) workgroup on persons dually eligible for Medicare and Medicaid (July 2012-July 2017) and NQF population health task force (2013-2014) <http://www.qualityforum.org/>) and NQF representative of the Consortium for Citizens with Disabilities (CCD) Task Force on Long Term Services and Supports (<http://www.c-c-d.org/>). 2017 member, NQF MAP workgroup on Medicaid adult measures. 2016-2017 NQF duals workgroup liaison to the NQF clinician workgroup. 2015-2016 and 2014-2015 NQF duals workgroup liaison to the NQF PAC/LTC workgroup. Member, NQF Medicare Star Ratings Technical Expert Panel (June-September 2019). Member, ONC (Office of the National Coordinator for Health Information Technology) Health IT Policy Committee, Consumer Workgroup, March 2013-November 2015; Consumer Task Force, November 2015-April 2016. (<http://www.healthit.gov/policy-researchers-implementers/federal-advisory-committees-facas/consumer-empowerment-workgroup>). Member, SAMHSA Wellness Campaign National Steering Committee – January 2011-September 2014. (<http://promoteacceptance.samhsa.gov/10by10/>).

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