



Performance Evaluation/Quality Leadership Group Work – 2022 Year-in-Review

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The primary content focus areas for the Performance Evaluation/Quality Leadership group are:

- Quality Measurement (measures, methods, adjustments, instruments, testing)
- Models of Care (4 domains required for SNP submission of MOC to NCQA and subject to CMS audits)
- SDOH/Social Risk Factors (identification, outreach, service response, follow-up)
- Health Equity (performance, stratification, disparities, effective practices, and collaborations)
- Research/Evaluation related to these subject matters (e.g., special projects)
- SNP Alliance Annual Survey

Summary: In 2022 we continued ongoing work describing SNP and MMP populations and advocating for modifications in measures, methods, and approach in evaluating performance of these plans and in developing and testing new measures as well as interpreting data in MA Stars Ratings. We worked with policymakers (Hill visits), regulators (CMS), researchers (RAND, independent researchers), and other key organizations such as the National Quality Forum and the National Committee for Quality Assurance.

We obtained SNPA member plan input on current practices as well as challenges and created comments and recommendations on rules pertaining to: MA Stars, Model of Care, social risk screening/HRA, Health Equity measurement, the Health Outcomes Survey. We provided subject matter expertise representing SNPs and MMPs through serving on three Technical Expert Panels (1) MA Stars, (2) Health Equity, (3) Person-Reported Outcome Measures. We worked with ATI Advisory on a HOS brief, and with independent experts to frame exploratory work on a “Beneficiary Complexity Index.” We analyzed results from the 2021 Annual Survey, presented results and refined the questions on the 2022 Annual SNPA Survey and distributed to members.

Detail:

- Quality Measurement/MA Stars & Research
 - Substantial comments to CMS; interpreted effects on SNPs/MMPs; provided analysis, advocacy.
 - Summarized the Quality/Stars section of *CY 2023 MA Part C & D Proposed and Final Rules and Advance Notice of Methodological Changes for CY 2023* for SNP Alliance members with analysis and commentary indicating areas of particular importance to SNPs and MMPs.
 - *CMS/RAND TEP on MA Stars* - virtual meeting February 2022.
 - Beneficiary Complexity Index – framed a BCI index and secured expert consultant for 2023

2023 Status: *This is core work for the SNP Alliance; we will continue in 2023 responding to all rules, notices and memos in these subject areas. Dr. Paone has served on the CMS/RAND TEP since 2018 and will continue if asked. We will launch the BCI workgroup in 2023.*

- Model of Care – This was an active year around MOC. Two key items: (1) Final Rule and (2) 2023 MOC guidelines.
 - Initiated information gathering and advocacy, particularly around clarification in federal vs. state MOC requirements and how to respond within a single MOC.
 - Conducted a brief survey with member plans, held calls, communicated with CMS questions and concerns, presented results, produced materials, and collaborated with CMS and NCQA.
 - Provided ad hoc support one-on-one to plans as needed regarding these new requirements.
 - Conducted a MOC 101 webinar for all members with materials.

2023 Status: *We continue to press for clarification, especially concerning state-mandates, off-cycle submission policies and processes, and attention to how MOC requirements align/integrate with relevant quality measurement and performance expectations. This is a growing area of work, given the transition of MMPs to D-SNPs.*

- SDOH/Social Risk Screening/Health Risk Assessment – This was also an active area of work in 2022. CMS issued several notices, rules, memos outlining the new requirement for SNPs on health risk assessment social risk -screening around insecurity on food, housing, and transportation. NCQA continued their work on SRS and follow-up measure. Responding to a direct request by CMS to the SNP Alliance asking for information on SNP practices around SRS screening and their HRAs, we:
 - Conducted a survey of member plans; analyzed and presented results and recommendations.
 - Held two member calls and one CMS call and then held a meeting with CMS and plan SMEs prior to CMS development of sub-regulatory guidance on the new requirements.
 - Collaborated with NCQA staff to provide information and discuss options for addressing challenges to SNPs and measure specification anomalies that would impede the objectives set for this measure.
 - Crafted education/discussion sessions at the Fall SNPA meeting related to this topic.

2023 Status: *Continue work with NCQA around SRS/Follow-up measure and with to MMCO/CMS around HRA/SRS; advocate for alignment between these two efforts/organizations; explore/respond to new state HRA/SRS mandates impacting SNPs (when possible) to illuminate challenges --working with integration, care management, quality SMEs.*

- Health Equity – This was also a busy area. CMS signaled the development of a *Health Equity Index* (HEI) and issued plans the *Health Equity Summary Score* (HESS) dashboard with plan-specific measurement data, requesting response by end of 2022.
 - We have strongly supported evaluating performance around dual eligible, disability, low -income status, race, ethnicity, language, and other important characteristics, including stratifying measure results, AND we request additional information around the HEI and HESS to better analyze and interpret how/if the composite measures and reporting provide an accurate picture for benchmarking and improvement for SNPs/MMPs.
 - Commented on the HEI and will do so on HESS
 - Serve as a member of the Health Equity TEP (National Quality Forum - Core Quality Measures)
 - Featured Health Equity sessions for SNPs at both the Spring and Fall SNPA meetings

2023 Status: *We will continue to offer insights into SNP and MMP populations and measure development and testing and request transparency so that we can analyze reported results/findings.*

- Health Outcomes Survey – We responded to comments on the PFADL measure (to CMS), responded to a PRA on HOS, and worked with ATI Advisory to frame an issue brief on HOS.

2023 Status: *We will publish the SNPA-ATI issue brief and work with legislators/policymakers and other stakeholders to bring attention to the HOS and seek improvement in person-reported surveys, methods, measures, and scoring.*

- NCQA – We provided comments on HEDIS measures, testing, development and, work staff to staff all year
- NQF – PROM-PM TEP work – been on the TEP for 2 years, also work staff to staff on PROMs and “person-centered planning” measure

2023 Status: *We will be working staff-to-staff with NCQA and NQF on targeted issues*

- SNP Alliance Annual Survey – Analyzed survey results, presented aggregate information, and used the information in advocacy and representation to describe SNP and MMP characteristics, unique service/care models, and focus to legislators, gov’t agencies, and other stakeholders. We modified the survey for 2023.

2023 Status: *Will analyze in 1st quarter and present results in April 2023 at the SNPA Member Meeting (DC).*