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STATES**



Leadership, innovation, collaboration
for state Aging and Disability agencies

All-State Call: CMS HCBS Quality Measure Set

July 28, 2022

Agenda

HCBS Quality Measure Set

- Background
- SMD Letter 22-003
- Key Takeaways

Group discussion and feedback

HCBS Quality Measure Set

Background

HCBS Quality Measure Set: Background

- **2018:** CMS (DEHPG) shared an HCBS quality strategic plan
 - Part of this work included the formation of the HCBS Quality Workgroup
 - ADvancing States, NASDDDS, and some state members were all part of the group



HCBS Quality Measure Set: Background

June 2019: CMS announced they would be issuing a HCBS recommended measure set in response to state requests for standardized measures

- Intended to be adopted in whole
- Align with NQF domains
- Voluntary

CMS agreed to publish an RFI for formal stakeholder feedback

September 2019:
Associations submitted NCI-IDD and NCI-AD measures for consideration

HCBS Quality Measure Set: Background

September 2020:

CMS released a request for information (RFI) seeking feedback on a draft set of recommended HCBS measures

- ADvancing States and NASDDDS submitted written feedback
- Measures were still described as voluntary and organized by NQF domain



State Medicaid Director Letter 22-003

HCBS Quality Measure Set: SMDL 22-003



July 21, 2022:
SMDL 22-003 was released, detailing first-ever HCBS Quality Measure Set

- 1st of 2 guidance documents from CMS
 - Intended for use in all HCBS programs
 - Intended to apply to both FFS and managed care
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- Organized by 1915(c) assurance/subassurances
 - Primarily rely on person-reported outcome measures pulled from consumer surveys

HCBS Quality Measure Set: SMDL 22-003

Measure Selection Criteria

- Importance to measure and report
- Scientific acceptability of the measure properties
- Feasibility
- Usability and use
- Related and competing measures

Not static

- This set is not fixed. CMS plans to update the measure set to address measure gaps, advance health information exchange, and address newly developed measures

HCBS Quality Measure Set: SMDL 22-003

In addition to addressing 1915(c) waiver assurances, CMS also identified other NEW priority areas:

- Access
- Rebalancing
- Community integration
 - HCBS Settings Requirements



HCBS Quality Measure Set: SMDL 22-003

Measures addressing Service Plan assurances are in blue shading

Measures addressing Health and Welfare assurances are in orange shading

NQF #	Measure Steward	Measure Name	Data Collection Method	Assurance Subassurance	Access	Rebalancing	Community Integration and HCBS Settings Requirements
NA	Advancing States, HSRI	NCI-AD: Percentage of people who are able to see or talk to their friends and family when they want to	Participant Reported Data/Survey				✓
NA	Advancing States, HSRI	NCI-AD: Percentage of people who have transportation when they want to do things outside of their home	Participant Reported Data/Survey		✓		✓
NA	Advancing States, HSRI	NCI-AD: Percentage of people who feel safe around their support staff	Participant Reported Data/Survey	Assurance: Health & Welfare - The State demonstrates it has designed and implemented an effective system for assuring waiver participant health and welfare. Subassurance: 1. The State demonstrates on an ongoing basis that it identifies, addresses and seeks to prevent instances of abuse, neglect, exploitation and unexplained death.			✓
NA	Advancing States, HSRI	NCI-AD: Percentage of people who are ever worried for the security of their personal belongings	Participant Reported Data/Survey	Assurance: Health & Welfare - The State demonstrates it has designed and implemented an effective system for assuring waiver participant health and welfare. Subassurance: 1. The State demonstrates on an ongoing basis that it identifies, addresses and seeks to prevent instances of abuse, neglect, exploitation and unexplained death.			✓
NA	Advancing States, HSRI	NCI-AD: Percentage of people whose money was taken or used without their permission in the last 12 months	Participant Reported Data/Survey	Assurance: Health & Welfare - The State demonstrates it has designed and implemented an effective system for assuring waiver participant health and welfare. Subassurance: 1. The State demonstrates on an ongoing basis that it identifies, addresses and seeks to prevent instances of abuse, neglect, exploitation and unexplained death.			✓
NA	Advancing States, HSRI	NCI-AD: Percentage of people in group settings who have enough privacy where they live	Participant Reported Data/Survey				✓
NA	Advancing States, HSRI	NCI-AD: Percentage of people who can choose or change what kind of services they get	Participant Reported Data/Survey	Assurance: Service Plan - The State demonstrates it has designed and implemented an effective system for reviewing the adequacy of service plans for waiver participants. Subassurance: 1. Service plans address all members' assessed needs (including health and safety risk factors) and personal goals, either by the provision of waiver services or through other means. Subassurance: 4. Participants are afforded choice between/among waiver services and providers.	✓		✓

HCBS Quality Measure Set: SMDL 22-003

CMS recommends that within 2 years of adoption states stratify these measures to address equity issues:

Race and ethnicity	Gender
Language	Age
Rurality	Disability

Key Takeaways

Key Takeaways



CMS plans to use tools at their disposal to make these required:

- Reporting requirements for MFP
- STCs for 1115 demos that include HCBS



The measure set is not required for other HCBS options [1915(c)/(i)/(j)/(k) & 1905(a)], but CMS encourages states to adopt it for those programs as well

Key Takeaways

Source

Vast majority of measures are drawn from consumer surveys

Flexibility

CMS permits states flexibility to determine which survey tool they implement:

NCI[®]-IDD

NCI-AD[™]

HCBS CAHPS[®], and

POM[®]

Key Takeaways



At least a third of all states **do not conduct consumer surveys** for older adults and persons with disabilities



Oversampling – necessary to stratify measures by REL - can be costly and a heavy administrative lift



Concerns around survey fatigue

Key Takeaways

To date, CMS has not been specific about the resources available to implement such significant changes



Discussion



Questions?



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