April 21, 2014

Marilyn B. Tavenner
Administrator
Centers for Medicare & Medicaid Services
Department of Health and Human Services
Attention: CMS–9949–P
P.O. Box 8016
Baltimore, MD 21244-8016

Re: Patient Protection and Affordable Care Act; Exchange and Insurance Market Standards for 2015 and Beyond

Dear Ms. Tavenner:

As a nationally recognized accrediting entity and one of three approved accreditors of issuers of Qualified Health Plans (QHPs) participating on Health Insurance Exchanges, the Accreditation Association for Ambulatory Health Care (AAAHC) is pleased to have the opportunity to submit these comments in response to the above mentioned proposed rule. AAAHC firmly supports CMS's goal of aligning QRS measures with accreditation standards.

In the proposed rule, CMS requests comment on how best to align the QRS measures reporting requirements with the accreditation standards for QHP issuers. Throughout its 35-year history, AAAHC has used the accreditation process to demonstrate continuous quality improvement over time. The AAAHC has incorporated clinical quality measures into its accreditation program for QHPs as required by law. However, the AAAHC is acutely aware of the increased administrative burden on QHPs which will be required to report on different measure sets to the accrediting entities and CMS.

With respect to the clinical quality measures, the AAAHC accreditation standards and survey process focus on the quality improvement efforts health plans make to improve performance on clinical quality measures, whether required by a state or federal program, or by AAAHC. To best align the clinical quality measure reporting requirements with accreditation standards, the AAAHC recommends that CMS provide open access to the QRS measures for the three recognized accrediting entities for issuers of QHPs. Each accrediting entity can then align its accreditation standards and survey process to focus on improving QHP performance on a uniform set of measures, ensuring that more resources are devoted to quality improvement rather than squandered on administrative compliance requirements.

AAAHC notes that CMS is considering developing measures for dental plans in the future. AAAHC continues to support the Dental Quality Alliance (DQA) on the extensive work it has done in developing such measures. The AAAHC strongly recommends that CMS consider the DQA measures if such measures are, in fact, implemented for dental plans in the future. Utilizing measures developed by an independent organization such as the DQA ensures that all recognized accrediting entities will have equal and fair access to any measures selected by CMS.
In the proposed rule, CMS proposes to direct a QHP issuer to submit data that has been validated in a form and manner specified by CMS. AAAHC applauds CMS for “considering establishing an application and approval process for independent third party data validators to allow QHP issuers to contract with validators that would be approved and monitored by CMS” and strongly encourages CMS to follow this process in the initial stages of reporting. Allowing a measure steward to determine its own validation process for a particular measure would result in an unnecessary additional administrative burden on the QHPs as multiple measure stewards may create divergent validation processes. Alignment of the validation process should be a CMS priority. Further, because HEDIS measures currently dominates the QRS measure set, the HEDIS measure steward would be unfairly advantaged. AAAHC strongly urges CMS to define the data validation process initially, thus ensuring minimal burden to the QHPs and allowing for accrediting entities to compete fairly.

Thank you for the opportunity to provide input into the proposed rule. We look forward to continuing to assist CMS in its mission to advance health care quality and value. Please do not hesitate to contact me or Carolyn Kurtz, General Counsel & Vice President, Government Affairs (847) 853-6072 or ckurtz@aaahc.org, if we can be of further assistance.

Sincerely,

[Signature]

John E. Burke, PhD
President & CEO, AAAHC