



November 9, 2017

Dr. Kara Odom Walker
Secretary
Delaware Department of Health and Social Service
Division of Medicaid & Medical Assistance
New Castle, DE 19720

Dear Dr. Walker:

The National Committee for Quality Assurance (NCQA) appreciates the opportunity to provide feedback on Delaware's Roadmap to Value. We strongly support the Department of Health and Social Services (DHSS) in its efforts to drive healthcare transformation through an all-payer accountability model and especially pleased the Roadmap includes a strong commitment to quality improvement.

As background, NCQA is a private, 501(c)(3) not-for-profit organization dedicated to improving health care quality. Since its founding in 1990, NCQA has been a central figure in driving improvement throughout the health care system, helping to elevate the issue of health care quality to the top of the national agenda. NCQA develops quality standards and performance measures for a broad range of health care entities, including health plans and provider groups. NCQA is deeply committed to working with public agencies to drive improvement in health care and we hope to be a valued partner to Delaware's Division of Medicaid & Medical Assistance (DMMA).

As the state of Delaware begins to develop a value-based framework and considers critical quality oversight policies and functions, NCQA can offer insight and expertise on the following:

- **Total Cost of Care Measurement:** Accountable Care Organizations and Clinically Integrated Networks.
- **Primary Care Practice Transformation:** NCQA Patient-Centered Medical Home (PCMH) Recognition.
- **Special Populations:** High Need, High Cost; Behavioral Health; Long-Term Services and Supports
- **Customized Solutions:** Performance Measurement Selection and Common Scorecard Development.

Please refer to the following page for a brief description of our work in each of these domains.

We would welcome the opportunity to discuss these ideas in greater depth and explore ways in which we can support the state of Delaware in its efforts to develop an all-pay accountability model. To coordinate, I can be reached at Toppe@ncqa.org or 202-955-1744.

We look forward to hearing from you.

Regards,

Kristine Thurston Toppe
Director, State Affairs
National Committee for Quality Assurance

Total Cost of Care Measurement.

NCQA is initiating a pilot to assess the cost of care for populations attributed to accountable care organizations (ACOs) and clinically integrated networks (CINs) across multiple payers using HealthPartners NQF endorsed Total Cost of Care measure. The measure accounts for complex factors driving spending including negotiated prices, service utilization, market variation and patient case-mix. This pilot is intended to inform development of a standardized approach for large scale implementation across the delivery system, which can be leveraged for Delaware's new accountability model. Further, we believe that an implemented standardized measure of total cost of care for ACO's and CIN's can promote comparison and benchmarking for regional and national levels.

Primary Care Practice Transformation.

We recommend including NCQA Patient-Centered Medical Home (PCMH) Recognition as a criterion for practices to receive value-based payment. NCQA PCMH promotes practice transformation, increases patient-centered care and improves health outcomes. Earlier this year we released NCQA PCMH 2017, our redesigned medical home program, which includes a new platform that promotes increased state flexibility. The redesigned program requires practices to meet core criteria, as well as a certain number of elective criteria. State initiatives may require specific elective criteria to advance state priorities. Additionally, the redesigned program will offer several Distinction options, including Distinction for Behavioral Health, which Delaware can leverage to promote behavioral health integration. Further, the new standards promote measurement and improvement at both the clinician and practice level.

NCQA PCMH Recognition is the most widely-used way to transform primary care practices into medical homes. More than 12,000 practices (60,000+ clinicians) are NCQA PCMH recognized – about 18 percent of all primary care clinicians. In Delaware, 202 clinicians across 77 practice sites are currently NCQA PCMH Recognized.

Special Populations.

NCQA recognizes the unique needs of special populations and continues to develop accountability programs to support quality oversight for high need, high cost populations. We are exploring development of a series of modules to be used in conjunction with any of our core programs to highlight and demonstrate quality for specific high need, high cost populations. Proposed populations to be included in our feasibility study include: Serious Illness; Serious Mental Illness; Substance Use; and Functional Disability/ Long-term Services and Supports.

NCQA maintains a suite of behavioral health and substance use treatment performance measures, which can be leveraged to promote standardized measurement in this space. Most recently, we introduced (in HEDIS 2018) measures addressing alcohol screening and depression screening, as well as a measure to address opioid misuse.

NCQA also launched two new programs to support quality oversight for organizations coordinating long-term services and supports. We are also doing a lot of work on LTSS measurement with the hopes of promoting measure standardization. We would be interested to learn how Delaware is managing this population.

Customized Solutions: Performance Measure Selection and Common Scorecard Development.

NCQA offers unique tailor-made assistance to support public sector and private health care leaders meet multidimensional challenges. NCQA has extensive experience with providing technical expertise in performance measure selection for state initiatives and can offer support as the state defines core and common measures for various patient populations.

Additionally, NCQA can help build accountability through development and maintenance of a common scorecard for quality measures across payers to support transparency and increase engagement. As an example, we work with the New York State Department of Health to produce report cards (consumer guides) on HMO performance. Since 2011, NCQA has also worked with the California Office of the Patient Advocate (OPA) to report cards for both health plans and medical groups.