



## ***Performance Evaluation/Quality Work*** **2020 “Year in Review” and 2021 Status & Priorities**

Our significant work this year was to respond to the Public Health Emergency due to COVID-19 through analysis and comments to CMS and other agencies to shine a light on the special characteristics of SNP/MMP members and health plans to encourage better regulation, policy, and legislation.

- Analysis and Comments to CMS on Quality Measurement/Stars and SDOH issues - We provided substantial analysis and comment development to respond to advance notices, proposed rules or final rules and interim final rules with comments. We commented on Stars, quality measurement issues, Model of Care, and SDOH related issues in light of the reality of COVID-19 and community disruptions with discussion of disproportionate impact on special needs populations (SNPA website links provided):
  - Advance Notice Part II (due March 6); See: [AN Part 2 March 6, 2020 SNPA Comments - Quality](#)
  - Proposed Rule (due April 6) See: [Proposed Rule due April 6, 2020 SNPA Comments - Model of Care & Quality sections](#)
  - Special “COVID-19” letter April 7, 2020; See: [SNPA COVID-19 Letter with Recommendations on Stars measures, MOC, SDOH](#)
  - Letter to CMS Director of Quality, Dr. Elizabeth Goldstein; April 9, 2020- [Performance Evaluation Latest 2020](#)
  - Interim Final Rule with Comment; (May 21, 2020) See: [SNPA IFC May 21, 2020 Quality-Stars recommendations](#)
  - RFI on HCBS (October 21, 2020) See within: [Performance Evaluation Latest 2020](#)
  - Advance Notice Part 1&2 (November 30, 2020 with Part 2 on Quality/Stars; See: [ANPart1&2 Letter Quality pp17-20](#)

**2021 Status:** *We will continue to bring our key messages around quality measurement and performance evaluation changes needed to recognize special needs populations characteristics— to CMS and other government agencies as well as respond to legislative or policy inquiries.*

- SDOH & ASPE Report Response - We reviewed and commented on the second and final ASPE report on accounting for social determinants of health in quality measurement. The report had some significant limitations and gaps in analysis and recommendations based on our review. We provided comments to ASPE in July. See the report at: [ASPE Social Risk in Medicare 2nd Report March 2020](#) and our comments at: [SNPA Letter to ASPE on 2nd Report - July 2020](#)

**2021 Status:** *We will continue to advocate strongly around recognizing SDOH and care complexity in quality measurement and performance evaluation, for example, through improving the Categorical Adjustment Index.*

- Health Outcomes Survey-We provided continued advocacy around HOS measure issues with CMS via individual communication and in formal comment letters as well as worked one-on-one with members around challenges with their HOS sample and HOS reports.
  - Achievements: Acknowledging issues around case mix and sample size, CMS agreed (changed regulatory language) to increase data capture of variables going into the

case mix adjustment calculation and increase the minimum sample size from 30 to 100. In addition, thus far, we and others have been successful in not having HOS applied to those under 65 with disabilities.

*2021 Status: We will continue to advocate strongly on this issue in 2021.*

- RAND/TEP on Stars/Medicare Quality Measurement - Dr. Deborah Paone is a member of the Technical Expert Panel on Medicare Stars & QA convened by RAND under contract with CMS; review and comment with other panel experts- discuss, units of analysis, cut point issues, CAI, SDOH, etc. Deborah has provided analysis and response to questions posed by RAND during and in-between meetings/calls. Our meetings were in November 2020. (NOTE: Meeting proceedings become public approximately 6 months later.) We shared our Quality Measurement Principles with RAND/CMS: <https://www.snppalliance.org/quality-assessment-and-performance-evaluation/>

*2021 Status: Dr. Paone has been on the TEP since 2018 and will continue to serve in 2021, advocating for attention to SDOH, special needs populations characteristics and measurement and method adjustments to take these characteristics into account.*

- Model of Care - We continued advocacy regarding the reach/scope of CMS response to BBA statutory language changes for C-SNPs around Model of Care requirements. CMS has proposed to apply to all SNP types (new MOC requirements). We have direct communication with CMS key staff, communication with NCQA and formal comment through comment letter vehicles (including IFC, PR). We also commented on the proposed Model of Care Audit Protocols.

*2021 Status: We will continue to advocate and inform around Model of Care in 2021. New MOC Scoring Guidelines are expected to be released soon.*

- FIDE-SNP HEDIS Measure Exclusions -NCQA (measure steward of selected HEDIS measures) did not agree to change their measurement specifications to include equivalent measure exclusions for FIDE-SNPs with members who are NFLOC (exclusions already granted to I-SNPs due to SNP Alliance work in prior years).

*2021 Status: We will continue to educate, inform, and advocate for treating NHLOC members equally when in a fully integrated D-SNP as when in an I-SNP.*

- SNP Alliance Annual Survey - The SNP Alliance Annual Survey of SNPs and MMPs is a substantial effort each year. This is led by Dr. Paone as part of the Performance Evaluation/Quality Leadership Group. Results are presented in the Spring SNPA Meeting and the SNP Alliance uses the information in advocacy, policy, and to educate key stakeholders throughout the year.

*2021 Status: With the 2021 Survey (2020 data) we will be able to compare to past years results (2016,17,18,19) to see what kind of impact COVID-19 may have had. This unique dataset allows us to look at trends and patterns and differences by SNP type - year over year. This helps us better understand and advocate for the unique features of SNPs and MMPs.*

**Thank you!** to all SNP Alliance members  
for your participation throughout the year in the PE/Quality Leadership Calls,  
as it is through your participation that our work is grounded in SNP and MMP issues  
and captures your insights.