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**MEMORANDUM**

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**FROM:** Mathematica Policy Research

**DATE:** 12/28/2018

**SUBJECT:** Quality Measure Development and Maintenance for CMS Programs  
Serving Medicare-Medicaid Enrollees and Medicaid-Only Enrollees:  
**Questions for Public Comment on Measure for new Medicaid long-term services and supports (LTSS) beneficiaries who receive home- and community-based services (HCBS) first**

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**Project Overview**

The Centers for Medicare & Medicaid Services (CMS) has contracted with Mathematica Policy Research and its partners, Brandeis University and the National Committee for Quality Assurance, to develop measures for the following populations of Medicaid beneficiaries:

- People eligible for both Medicare and Medicaid, or “Dual eligible beneficiaries”
- People receiving long-term services and supports (LTSS) through managed care organizations
- People with substance use disorders; beneficiaries with complex care needs and high costs; beneficiaries with physical and mental health needs; or Medicaid beneficiaries who receive LTSS in the community

The contract name is Quality Measure Development and Maintenance for CMS Programs Serving Medicare-Medicaid Enrollees and Medicaid-Only Enrollees. The contract number is HHSM-500-2013-13011I, Task Order #HHSM-500-T0004.

**Documents and Measures for Comment**

As part of its measure development process, CMS requests interested parties to submit comments on the candidate or concept measures that may be suitable for this project.

This call for public comment concerns the measure specifications, and justification, for the following measure:

- HCBS-11 – New Medicaid LTSS Beneficiaries Using HCBS First.

The Measure Information Form (MIF) and Measure Justification Form (MJF) for this measure are available in separate files here: <https://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/MMS/PC-Currently-Accepting-Comments.html>

FROM: Mathematica Policy Research  
DATE: 12/28/2018  
PAGE: 2

The project team seeks public comment on the following questions:

### General Questions

1. Is the candidate measure useful for measuring important domains of quality for the Medicaid LTSS population?
2. Does the measure duplicate comparable measures that have already been validated and widely used, are now under development, or will be submitted for consensus-based entity (NQF) endorsement? Does the measure duplicate information already systematically reported by states (if so, which state)?
3. Are you aware of any new or additional studies that should be included in the MJF that support (or weaken) the justification for developing the measure? If so, please describe the findings and provide a full citation.
4. Are the measure specifications in the MIF clear? For example, are the numerator, denominator, and any potential exclusions and stratifications clearly defined? What should be more clearly defined?

### Measure Specification Questions

1. Is a 12-month measurement period appropriate?
2. The denominator consists of “new LTSS beneficiaries,” defined as those who did not have LTSS use for 1 year (12 months) prior to the first use of LTSS during the measurement period. Is this definition of new LTSS users appropriate? Should the team consider a longer or shorter look-back period?
3. What exclusionary criteria should be considered for the denominator?
4. The purpose of the measure is to capture long-term institutional stays, not short-term post-acute care stays. What is the appropriate length of stay to identify long-term nursing facility stays (i.e., at least 91 days, at least 101 days)?
5. How should dual eligible beneficiaries’ use of skilled nursing facilities (SNFs) (covered by Medicare) be distinguished from their use of long-term nursing facilities (covered by Medicaid)?
6. Should measure performance rates be stratified by age group, dual eligible status, or Medicaid delivery system (fee-for-service claims versus managed care)? Should we consider stratifying the measure by any other factors? Please explain your responses.

### Public Comment Instructions

- If you are providing comments on behalf of an organization, include the organization’s name and contact information.
- If you are commenting as an individual, submit identifying or contact information.
- Please do not include personal health information in your comments.
- Send your comments to [HCBSQualMeasures@mathematica-mpr.com](mailto:HCBSQualMeasures@mathematica-mpr.com). *In the subject of your email or letter, please include the measure name or acronym and indicate whether you “support,” “support with modifications,” or “do not support” the measure.*