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Patient Experience and Function Spring 2021 Cycle: Public and Member Comments

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Measure-Specific Comments on Patient Experience and Function Spring 2021 Submissions

NQF #3622 National Core Indicators for Intellectual and Developmental Disabilities (ID/DD) Home- and Community-Based Services (HCBS) Measures, Comment #7750

Standing Committee Recommendation: Measure Recommended for Endorsement

Comment ID#: 7750

Commenter: Submitted by Mary McGurran

Council / Public: Public

Comment Period: Post-Evaluation Public and Member Commenting

Date Comment was Submitted: 9/1/2021

Developer Response Required? Yes

Level of Support: N/A

Theme: Generally supportive with recommendations for improvement

Comment

Health, welfare, safety. In Minnesota reports of suspected vulnerable maltreatment are confidential and reporter identity protected. Reporters are notified on if report was accepted. Reporters not required to notify family. This encourages reporting to discover and respond. Family may be reported by someone outside family. Family notification may not be in the person's interests/wishes. Limited information sharing protects person's privacy. Investigation of licensed providers are public. Suggest: If a report of abuse, neglect or financial exploitation was filed by a family respondent in the past 12 months, the percentage of family respondents who identify they were notified of the outcome of the report in a timely manner. If a report of abuse, neglect or financial exploitation was filed by a family respondent in the past 12 months, the percentage of family respondents who identify services and supports were offered to stop the abuse, neglect or financial exploitation.

Developer Response

Thank you for pointing out the importance of measures about abuse or neglect and of monitoring the timing and quality of responses to reports of maltreatment. Although not as part of #3622, National Core Indicators (NCI) does collect this information through the NCI Family Surveys, administered to family members of Home- and Community-Based Services (HCBS) recipients. For example, in the Adult Family Survey (one of NCI Family Surveys), family respondents are asked the following questions:

“Within the past year, was a report of abuse or neglect filed on behalf of your family member?

If yes, did the appropriate people respond to the report? If someone outside of your family reported abuse or neglect, were you notified of the report in a timely manner?”

The two measures suggested in your comment appeared similar to those Adult Family Survey questions. Here is a recent report featuring results from these Adult Family Survey questions.

Notably, NCI Family Surveys are entirely different in terms of respondent and methodology from the NCI In-Person Survey (IPS), which the 14 measures submitted as part of #3622 were based on. IPS is person-reported, person-centered and focused on key HCBS domains identified by the NQF report entitled

“Quality in Home and Community-Based Services to Support Community Living: Addressing Gaps in Performance Measurement”. We hope this clarification is helpful and would love to continue the conversation with you and answer any additional questions about IPS and Family Surveys. Many thanks for taking the time to comment on #3622.

NQF Response

Thank you for your comment.

NQF Committee Response

N/A

NQF #3622 National Core Indicators for Intellectual and Developmental Disabilities (ID/DD) Home- and Community-Based Services (HCBS) Measures, Comment #7780

Standing Committee Recommendation: Measure Recommended for Endorsement

Comment ID#: 7780

Commenter: Lauren Agoratus, Family Voices NJ; Submitted by Lauren Agoratus

Council / Public: Public

Comment Period: Post-Evaluation Public and Member Commenting

Date Comment was Submitted: 9/16/2021

Developer Response Required? Yes

Level of Support: N/A

Theme: Generally supportive but with specific concerns

Comment

We strongly support the 5 measures on PCP (person-centered planning), particularly community inclusion. We also support the 4 measures on community inclusion specifically. In addition, we support the 4 measures regarding choice and control. #CC-4 needs more details: choice regarding what (e.g. when/what to eat, when to sleep, roommates, etc.) Although we support the domain on human rights, this encompasses so much more than personal space. Self-advocates need to know how to appeal denials of services and programs such as SSI (supplemental security income), how to get insurance, how to appeal denied claims, etc. We would recommend a measure addressing ADLs (activities of daily living). We would also recommend a measure regarding necessary medical supports (including respite for family caregivers), as well as behavioral health, which allows individuals with disabilities to remain in their communities. This could include out-of-state authorizations and direct support during hospitalization.

Further, under adjustment/stratification regarding residential placement, this list is not comprehensive. There is supported housing, supervised apartments, independent living apartments, etc. We note that there were concerns regarding diversity in sample populations. We also note that while reliability/validity testing was done, there were concerns with feasibility. We agree that some CAHPS (consumer assessment of health providers and systems) measures may be considered “competing measures” and will be discussed by the committee in the post-comment call. We specifically note the CAHPS measure regarding physical safety/harm as the issue of restraints and injuries still exists, particularly in congregate setting, and institutional abuse is another reason HCBS is so essential.

Developer Response

Thank you for supporting #3622 and raising these vitally important points.

We agree that Home- and Community-Based Services (HCBS) play a critical role in empowering millions to live meaningful lives in the community of their choice. We also believe it is important to measure the effect HCBS has on critical life outcomes such as choice, rights and respect, health, access to supports and others. By measuring these outcomes, state agencies can understand their performance and how services are affecting people’s lives. With that information, state agencies can determine their priorities for moving forward and supporting people to achieve their goals and live the lives of their choosing. These data are critically important, particularly in light of the COVID-19 pandemic, when services may

have been altered and people's routines were upended. In principle, we align with the 2016 NQF published report entitled "Quality in Home and Community-Based Services to Support Community Living: Addressing Gaps in Performance Measurement", affirming the significance of HCBS quality measures.

Regarding cultural and linguistic competency's importance in addressing health disparities —again, we strongly agree. Not all of our measures directly address health and health disparities, but we recognize the importance of social factors as crucial determinants of health and take them into account whenever relevant and possible. The guiding principle for our submitted measures has been Person-Centered Planning and Practice (PCP). PCP is a facilitated, individual-directed, positive approach to the planning and coordination of a person's services and supports based on individual aspirations, needs, preferences, and values (NQF, 2020, p.7). Cultural humility and competency are key aspects of PCP, which take the whole person and the complexity of their experience and worldview into account. PCP and cultural competency were key factors that were carefully considered in survey question development. In terms of linguistic competency, the In-Person Survey tool is available in English, Spanish, and other languages as needed.

We recognize the importance of addressing state-specific needs. For example, to consider state differences in residence settings, the submitted measures are stratified by 5 residence types:

1. Intermediate Care Facility for Individuals with Intellectual Disabilities (ICF/IID), nursing facility, or other institutional setting
2. Group residential setting (e.g., group home)
3. Own home or apartment
4. Parents' or relatives' home
5. Foster care or host home

This stratification allows states to gather important data about community vs. institutional settings and discover where differences in outcomes are present. With that information, state agencies can work to ensure people are living in the settings that best allow them to live the lives they want. For more details, please refer to the PEF draft report pages 27 and 44. Surveys without these considerations would not be able to stratify results by residence settings.

We share your concerns about the impact of COVID-19 on inequities. Due to the unforeseen nature of COVID-19, none of our 14 measures directly address the pandemic. National Core Indicators (NCI) has since added supplements specific to COVID-19 to collect information about respondents' experiences during the pandemic. The supplements were fielded during the 2020-21 data collection wave. These supplemental data will allow analysis of the impact of the COVID-19 pandemic on the 14 submitted measures.

Your input and support of #3622 are highly appreciated. We hope this response is helpful in addressing your questions, and we welcome any further discussions.

NQF Response

N/A

NQF Committee Response

Thank you for your comment. The Standing Committee will review and discuss this information during the post comment meeting.

NQF #3622 National Core Indicators for Intellectual and Developmental Disabilities (ID/DD) Home- and Community-Based Services (HCBS) Measures, Comment #7797

Standing Committee Recommendation: Measure Recommended for Endorsement

Comment ID#: 7797

Commenter: Submitted by Desiree Kameka

Council / Public: Public

Comment Period: Post-Evaluation Public and Member Commenting

Date Comment was Submitted: 9/21/2021

Developer Response Required? Yes

Level of Support: N/A

Theme: Generally supportive with recommendations for improvement

Comment

In the last decade, research has demonstrated what we knew intrinsically to be true: health starts at home. Furthermore, when individuals, even those with the most complex needs, are supported to make decisions about where and with whom they live, and from whom they receive support, we can improve services, reduce costs, increase efficiency and, most importantly, improve their quality of life. It is why we partnered with Arizona State University's Morrison Institute to develop A Place In The World: Fueling Housing and Community Options For Adults With Autism and Other Neurodiversities (APITW) in order to present a wide spectrum of possibilities for housing and community development to meet the needs of the neurodiverse population. APITW provides the foundational nomenclature for housing and service delivery models with the goal to further define market segments, establishes best practices and guiding principles, and helps drive crucial partnerships that address pressing needs resulting from the current housing crisis. Additionally, APITW includes a Policy Paper, funded by the Daniel Jordan Fiddle Foundation, which reviewed the historical evolution of federal policies that influence housing and long-term services and supports (LTSS) for adults with autism and/or intellectual/developmental disabilities (I/DD). Over the next decade, 707,000 to 1,116,000 teens diagnosed with autism will turn 18. Many of these individuals will age out of school support systems but will be deemed ineligible for HCBS. They will continue to need LTSS in their homes and communities, which will enable them to engage in work activities, lead healthy and self-directed lives. Federal programs are seriously limited in their scope and capacity to provide necessary housing assistance for adults with autism, resulting in a shortage of affordable housing and persistent fears from self-advocates and families about homelessness or displacement. Time is limited for millions of adults with autism and/or I/DD who are living with aging caregivers, as well as the significant increase in those transitioning to adulthood annually. APITW identified the data gaps needed to calculate the total unmet housing need, to expand the definition of accessibility to address the needs of this population and to make this population a public policy priority. We reviewed the NCI-IDD measures and believe the data collected will truly offer a glimpse into the everyday lives of HCBS recipients. In the future, we hope that states can also incorporate segmentation as defined in the APITW nomenclature such as levels of support need, service delivery model used -- whether the person lives in a provider-controlled or consumer-controlled setting. The following indicators should be ranked among the Top 5 for impact on quality of life measurement:

- % of people who do the things they like in their communities as much as they want
- % of people who do things in the community with the people they want

- % of people who feel that they belong to the group, organization or community they take part in: they can be themselves and feel included
- Of those who do not live in the family home, % of people who reported having input in choosing where they live
- % of people who report having input in choosing their daily schedule

We are concerned that the framing of some questions is ableist and may harm those being asked by neurotypical or able-bodied facilitators that underscore the value to an HCBS recipient that their relationships with non-disabled peers is more valuable than those who have a disability, thus they are perceived as not having as much value as their peers without disabilities. This is a direct ableist assumption being asked of the minority without considering how much time they want to spend with people who do not have disabilities. For example, to ask an individual who is African-American how much time they have spent with their caucasian peers would be underscoring the racist assumption that its best to have caucasian friends because they can potentially extend their privileges to you, the minority. Indicators of concern of which we hope the facilitators have been thoroughly trained to thwart ableist bias to prevent harm:

- The percentage of people who report they participated in specific integrated activities in the past month.
- The percentage of people who report that some or all of the groups, organizations, and communities they take part in include people without disabilities. This can be mitigated by first asking if they are able to spend the time they want with friends who are not in HCBS services with them or do not have disabilities. Asking the barriers to access would also be tremendous and underscore that the question is not ableist, but ensuring they are supported to be with people who are not part of the HCBS programming if they desire.

Without a doubt, the majority of the NCI-IDD measures will add invaluable data to assist policymakers and stakeholders to assess the support and services provided to individuals with IDD as well as other HCBS recipients. We are committed to continuing to develop properties and opportunities, and support others as well, to develop initiatives which place a premium on consumer-controlled settings and consumer-directed supports, we wholeheartedly endorse the inclusion of these NCI-IDD data measures in the NQF PEF.

Thank you for your consideration of our comments,

Developer Response

Thank you for the extensive comment—we have reviewed it carefully and appreciate the opportunity to respond. Here are some points of clarification for your consideration.

We agree that the framing of the questions is vitally important, and we take your concern regarding framing very seriously.

The indicators of concern that you quoted were:

- “The percentage of people who report they participated in specific integrated activities in the past month”
- “The percentage of people who report that some or all of the groups, organizations, and communities they take part in include people without disabilities”

We recognize that these are National Core Indicators In-Person Survey (IPS) indicators. The purposes of those indicators are as population-level quality measures. From a population- or systems-level perspective, it is important to understand whether there are state differences or trends on these indicators that suggest limited opportunities for integrated community engagement. To clarify, these

two indicators were not in the 14 measures we submitted for consideration.

These indicators are related to our submitted measure PCP-5, and especially PCP-5.4 (bolded below):

- Question PCP-5.1. Think about how often you went out for entertainment in the past month. Would you like to go out for entertainment more, less, or the same amount as now?
- Question PCP-5.2. Think about how often you went to a restaurant or coffee shop in the past month. Would you like to go out to a restaurant or coffee shop more, less, or the same amount as now?
- Question PCP-5.3. Think about how often you went to a religious service or spiritual practice in the past month. Would you like to go to religious services or spiritual practices more, less, or the same amount as now?
- **Question PCP-5.4. Do you want to be a part of more groups in your community?**

For each of the questions listed above, the framing is Person-Centered Planning and Practice—it matters most what the survey respondent deemed satisfactory or unsatisfactory, important or unimportant. No assumption is placed on any of frequency or preference options for any of the listed activities. Just because these activities are mentioned does not mean they are endorsed. For example, the fact that “coffee shops” were mentioned does not mean the measure endorses coffee shops over other types of establishments. Similarly, in Question PCP-5.4, the mention of “groups in the community”—which may be interpreted to be inclusive (people with and without disabilities) rather than exclusive—does not mean the respondent should favor one way or another. The focus of the question was the respondent’s preference. The question that precedes PCP-5.4 in the survey instrument and describes what would be considered a community group is carefully worded to refrain from implying that any type of group is preferable to any other: “Are you a part of any community groups? (This includes church groups, book clubs, knitting groups or any other formal or informal community group in an inclusive setting.)” It is our survey protocol to present all questions and response options equally without bias or preference. Surveyors are trained to avoid implicit or explicit value judgments in response to participants’ answers. At the beginning of the survey, respondents are reminded that there are no right or wrong answers. For Question PCP-5.4, the same applies. We recognize and respect the full range of opinions regarding these questions.

Thank you for bringing APITW to our attention. We will review the policy paper and look into the nomenclature for levels of support needs and service delivery models.

In summary, we greatly appreciate your input and your support of #3622. Hope this response is helpful in addressing your points of concern. We are always open to opportunities to further improve our measures and your comment is highly valued.

NQF Response

Thank you for your comment.

NQF Committee Response

N/A

NQF #3622 National Core Indicators for Intellectual and Developmental Disabilities (ID/DD) Home- and Community-Based Services (HCBS) Measures, Comment #7748

Standing Committee Recommendation: Measure Recommended for Endorsement

Comment ID#: 7748

Commenter: Submitted by Patricia Sastoque

Council / Public: Public

Comment Period: Post-Evaluation Public and Member Commenting

Date Comment was Submitted: 8/31/2021

Developer Response Required? No

Level of Support: N/A

Theme: Supportive

Comment

I am writing to support the endorsement of the NCI measure by the National Quality Forum. I believe that the endorsement of this NCI measure is essential to ensure sound measurement of a key facet of long term supports and services and will contribute positively to efforts to monitor and improve quality supports for people with intellectual and developmental disability. Endorsement of these measures is an important addition to NQF's limited set of endorsed measures of quality in Home and Community Based Supports.

Thank you for the opportunity to provide comment and support for the endorsement of the NCI measures. Inclusion of these in the NQF measures will begin to address an important gap in measures of community based LTSS and will be essential to ensure that the supports and services provided result in positive outcomes for individuals receiving support.

Developer Response

N/A

NQF Response

Thank you for your comment.

NQF Committee Response

N/A

NQF #3622 National Core Indicators for Intellectual and Developmental Disabilities (ID/DD) Home- and Community-Based Services (HCBS) Measures, Comment #7764

Standing Committee Recommendation: Measure Recommended for Endorsement

Comment ID#: 7764

Commenter: Submitted by Julia Walsh

Council / Public: Public

Comment Period: Post-Evaluation Public and Member Commenting

Date Comment was Submitted: 9/9/2021

Developer Response Required? No

Level of Support: N/A

Theme: Additional considerations, PROM

Comment

I am writing to support the endorsement of the NCI measure by the National Quality Forum.

- Endorsement of these measures is an important addition to NQF's limited set of endorsed measures of quality in Home and Community Based Supports.
- NCI measures are tailored to capture quality information directly from the population with intellectual and developmental disabilities.
- The National Core Indicators measure under consideration by NQF supports a vision of quality, recognizes the essential role that HCBS plays in people's lives, and prioritizes quality monitoring and quality improvement to achieve efficient, effective, equitable supports for people with disabilities.
- The specific domains covered in the NCI measure that is under review: person centered planning, community inclusion, choice and control, and human rights are particularly in need and are indicators of high-quality service outcomes.
- I believe that the endorsement of this NCI measure is essential to ensure sound measurement across the life span for supports and services and will contribute positively to efforts to monitor and improve quality supports for people with intellectual and developmental disability.

Thank you for the opportunity to provide comment and support for the endorsement of the NCI measures. Inclusion of these in the NQF measures will begin to address an important gap in measures of community based LTSS and will be essential to ensure that the supports and services provided result in positive outcomes for individuals receiving support.

Developer Response

N/A

NQF Response

Thank you for your comment.

NQF Committee Response

N/A

NQF #3622 National Core Indicators for Intellectual and Developmental Disabilities (ID/DD) Home- and Community-Based Services (HCBS) Measures, Comment #7776

Standing Committee Recommendation: Measure Recommended for Endorsement

Comment ID#: 7776

Commenter: Tara Giberga, PA Office of Developmental Programs; Submitted by Tara Giberga

Council / Public: Public

Comment Period: Post-Evaluation Public and Member Commenting

Date Comment was Submitted: 9/13/2021

Developer Response Required? No

Level of Support: N/A

Theme: Supportive

Comment

Pennsylvania's Office of Developmental Programs (ODP) is thankful for the opportunity to provide comments in support of endorsing the 14 quality indicators of services and supports for people with intellectual and developmental disabilities (IDD), submitted by NCI for state IDD systems (NCI-IDD), to the National Quality Forum (NQF). ODP currently uses numerous NCI measures to evaluate service system performance.

Domains covered by the NCI indicators under review include person-centered planning, community inclusion, choice and control, and human rights, and represent high priority needs, and therefore indicators of high-quality service outcomes. NCI measures are crafted to capture quality information directly from the IDD population and thus the measures under consideration by NQF support a vision for quality that recognizes the value of inclusion and input from the IDD population and the critical role that HCBS play in lives. Inclusion of the NCI measures in NQF is a great start at addressing critical gaps and this unprecedented opportunity to have meaningful indicators of person-centeredness and service quality for this population of people, by this esteemed body, is very exciting!

Developer Response

N/A

NQF Response

Thank you for your comment.

NQF Committee Response

N/A

NQF #3622 National Core Indicators for Intellectual and Developmental Disabilities (ID/DD) Home- and Community-Based Services (HCBS) Measures, Comment #7777

Standing Committee Recommendation: Measure Recommended for Endorsement

Comment ID#: 7777

Commenter: Cathy Lerza, Kentucky Division of Developmental and Intellectual Disabilities; Submitted by Cathy Lerza

Council / Public: Public

Comment Period: Post-Evaluation Public and Member Commenting

Date Comment was Submitted: 9/15/2021

Developer Response Required? No

Level of Support: N/A

Theme: Supportive

Comment

The Kentucky Division of Developmental and Intellectual Disabilities supports the endorsement of the NCI-ID/DD measures by the National Quality Forum. Kentucky is one of 46 states currently using the measures. While most states use NCI for measuring quality, NQF currently has few endorsed measures of quality in Home and Community Based Supports. These NCI measures are particularly useful to us because they are specifically designed to gather information directly from people with intellectual and developmental disabilities.

Developer Response

N/A

NQF Response

Thank you for your comment.

NQF Committee Response

N/A

NQF #3622 National Core Indicators for Intellectual and Developmental Disabilities (ID/DD) Home- and Community-Based Services (HCBS) Measures, Comment #7778

Standing Committee Recommendation: Measure Recommended for Endorsement

Comment ID#: 7778

Commenter: Kim Opsahl, State of Indiana/FSSA/DDRS; Submitted by Shelly Thomas

Council / Public: Public

Comment Period: Post-Evaluation Public and Member Commenting

Date Comment was Submitted: 9/16/2021

Developer Response Required? No

Level of Support: N/A

Theme: Supportive

Comment

On behalf of the Division of Disability and Rehabilitative Services in the State of Indiana, we are writing to support the endorsement of the NCI measure by the National Quality Forum. Over 30,000 individuals with intellectual and developmental disabilities are currently being supported by a Home and Community Based Services waiver in Indiana. Including their voice is an essential component in assessing long term supports and services. Below are additional areas of importance:

- Endorsement of these measures is an important addition to NQF's limited set of endorsed measures of quality in Home and Community Based Services.
- NCI measures are tailored to capture quality information directly from the population with intellectual and developmental disabilities.
- The National Core Indicators measure under consideration by NQF supports a vision of quality and recognizes the essential role that HCBS plays in people's lives, and prioritizes quality monitoring and quality improvement to achieve efficient, effective, equitable supports for people with disabilities.
- The specific domains covered in the NCI measure that is under review: person centered planning, community inclusion, choice and control, and human rights are particularly in need and are indicators of high quality service outcomes.
- I believe that the endorsement of this NCI measure is essential to ensure sound measurement of a key facet of long term supports and services and will contribute positively to efforts to monitor and improve quality supports for people with intellectual and developmental disability.

Thank you for the opportunity to provide comment and support for the endorsement of the NCI measures. Inclusion of these in the NQF measures will begin to address an important gap in measures of community based LTSS and will be essential to ensure that the supports and services provided result in positive outcomes for individuals receiving support.

Developer Response

N/A

NQF Response

Thank you for your comment.

NQF Committee Response

N/A

NQF #3622 National Core Indicators for Intellectual and Developmental Disabilities (ID/DD) Home- and Community-Based Services (HCBS) Measures, Comment #7782

Standing Committee Recommendation: Measure Recommended for Endorsement

Comment ID#: 7782

Commenter: Christina Wu, National MLTSS Health Plan Association; Submitted by Christina Wu

Council / Public: Public

Comment Period: Post-Evaluation Public and Member Commenting

Date Comment was Submitted: 9/16/2021

Developer Response Required? No

Level of Support: N/A

Theme: Supportive

Comment

The National MLTSS Health Plan Association represents health plans that contract with states to provide long-term services and supports (LTSS) to beneficiaries through the Medicaid program. Our members currently cover the large majority of all enrollees in MLTSS plans and assist states with delivering high-quality LTSS at the same or lower cost as the fee-for-service system with a focus on ensuring beneficiaries' quality of life and ability to live as independently as possible. Member organizations include Aetna Inc., AmeriHealth Caritas, Anthem, Centene Corp., Commonwealth Care Alliance, Inlusa Inc., L.A. Care Health Plan, Lakeland Care, Molina Healthcare, UPMC Health Plan and VNSNY CHOICE.

The National MLTSS Health Plan Association supports the endorsement of the 14 NCI-ID/DD measures by the National Quality Forum. Many of the measures under consideration mirror the NCI-AD (Aging and Disabilities) measures, which the MLTSS Association supports. These measures are crafted to capture information on person-centered outcomes and service quality directly from the population with ID/DD (e.g., the service plan includes things that are important to the member). The specific domains covered in the proposed NCI measure (i.e., person-centered planning and coordination, community inclusion, choice and control, and human and legal rights) are important and appropriate indicators of high-quality outcomes for home and community-based services (HCBS). Given the current dearth in standardized quality measures for HCBS, inclusion of these NCI-ID/DD measures in NQF-endorsed measures will begin to address this critical gap and drive the field towards greater consistency across payers and states, and improve overall consumer choice, quality expectations, and policy advancement.

Developer Response

N/A

NQF Response

Thank you for your comment.

NQF Committee Response

N/A

NQF #3622 National Core Indicators for Intellectual and Developmental Disabilities (ID/DD) Home- and Community-Based Services (HCBS) Measures, Comment #7783

Standing Committee Recommendation: Measure Recommended for Endorsement

Comment ID#: 7783

Commenter: Barbara Palmer, Agency for Persons with Disabilities - Florida; Submitted by Edwin DeBardeleben

Council / Public: Public

Comment Period: Post-Evaluation Public and Member Commenting

Date Comment was Submitted: 9/16/2021

Developer Response Required? No

Level of Support: N/A

Theme: Additional considerations

Comment

To Whom It May Concern:

I am writing to support the addition of the new measures developed by the National Core Indicators' (NCI) to be used by the National Quality Forum (NQF). Endorsement of these measures is an important addition to NQF's limited set of endorsed quality measures of Home and Community Based Services (HCBS). The NCI measures are tailored to capture quality information directly from the population with intellectual and developmental disabilities.

The NCI measures under consideration by NQF supports a vision of quality, recognizes the essential role that HCBS plays in people's lives, and prioritizes quality monitoring and improvement to achieve efficient, effective, equitable supports for people with disabilities. The specific domains covered in the NCI measures that are under review are: person centered planning, community inclusion, choice and control, and human rights.

I believe that the endorsement of NCI measures is essential to ensure sound measurement of a key facet of long-term supports and services and will contribute positively to efforts to monitor and improve quality supports for people with intellectual and developmental disability.

Thank you for the opportunity to provide comment and support for the endorsement of the NCI measures. Inclusion of these in the NQF measures will begin to address an important gap in measures of community-based long-term services and supports and will be essential to ensure that the supports and services provided result in positive outcomes for individuals receiving supports.

Sincerely,

Barbara Palmer

Director

Developer Response

N/A

NQF Response

Thank you for your comment.

NQF Committee Response

N/A

NQF #3622 National Core Indicators for Intellectual and Developmental Disabilities (ID/DD) Home- and Community-Based Services (HCBS) Measures, Comment #7784

Standing Committee Recommendation: Measure Recommended for Endorsement

Comment ID#: 7784

Commenter: Submitted by Leslie Morrison

Council / Public: Public

Comment Period: Post-Evaluation Public and Member Commenting

Date Comment was Submitted: 9/16/2021

Developer Response Required? No

Level of Support: N/A

Theme: Supportive

Comment

The California Department of Developmental Services supports the endorsement of the five National Core Indicator (NCI) measures by the National Quality Forum (NQF). We serve over 355,000 individuals with intellectual and developmental disabilities on a monthly basis. Including their perspective is an essential component of evaluating long term supports and services.

These measures would add critical, focused, consumer-centered measures to the NQF's existing endorsed measures of quality for Home and Community Based Services. These measures would enable consideration of the actual voices of people with intellectual and developmental disabilities regarding their ability to make life choices and achieve community inclusion and participation. This information would complement other available administrative and fiscal information about long-term services and supports. NQF's endorsement would provide an important push forward for efforts to achieve efficient, effective, and equitable supports for people with intellectual and developmental disabilities. Thank you for the opportunity to provide comment and support for the endorsement of these NCI measures.

Developer Response

N/A

NQF Response

Thank you for your comment.

NQF Committee Response

N/A

NQF #3622 National Core Indicators for Intellectual and Developmental Disabilities (ID/DD) Home- and Community-Based Services (HCBS) Measures, Comment #7787

Standing Committee Recommendation: Measure Recommended for Endorsement

Comment ID#: 7787

Commenter: Submitted by Robin Wilmoth

Council / Public: Public

Comment Period: Post-Evaluation Public and Member Commenting

Date Comment was Submitted: 9/17/2021

Developer Response Required? No

Level of Support: N/A

Theme: Supportive

Comment

I am writing from Tennessee to strongly support the endorsement of the NCI measure by the National Quality Forum. I have worked with NCI over the past years and found their work to be of great value. Their work has assisted within our state with the advancement of knowledge of the field of disabilities to a wide variety of stakeholders.

- Endorsement of these measures is an important addition to NQF's limited set of endorsed measures of quality in Home and Community Based Supports.
- NCI measures are tailored to capture quality information directly from the population with intellectual and developmental disabilities
- The National Core Indicators measure under consideration by NQF supports a vision of quality recognizes the essential role that HCBS plays in people's lives, and prioritizes quality monitoring and quality improvement to achieve efficient, effective, equitable supports for people with disabilities.
- The specific domains covered in the NCI measure that is under review: person centered planning, community inclusion, choice and control, and human rights are particularly in need and are indicators of high quality service outcomes.
- I believe that the endorsement of this NCI measure is essential to ensure sound measurement of a key facet of long term supports and services and will contribute positively to efforts to monitor and improve quality supports for people with intellectual and developmental disability.

Thank you for the opportunity to allow me to provide comment and support for the endorsement of the NCI measures. Inclusion of these in the NQF measures will begin to address an important gap in measures of community based LTSS and will be essential to ensure that the supports and services provided result in positive outcomes for individuals receiving support.

Robin Wilmoth

Department of Intellectual and Developmental Disabilities Tennessee

Developer Response

N/A

NQF Response

Thank you for your comment.

NQF Committee Response

N/A

NQF #3622 National Core Indicators for Intellectual and Developmental Disabilities (ID/DD) Home- and Community-Based Services (HCBS) Measures, Comment #7788

Standing Committee Recommendation: Measure Recommended for Endorsement

Comment ID#: 7788

Commenter: Submitted by Carol Batangan-Rivera

Council / Public: Public

Comment Period: Post-Evaluation Public and Member Commenting

Date Comment was Submitted: 9/17/2021

Developer Response Required? No

Level of Support: N/A

Theme: Supportive

Comment

I am writing to support the endorsement of the NCI measure by the National Quality Forum (NQF).

The NCI foundational principle includes that the individual with intellectual and developmental disabilities is the "most important informant regarding the performance of public services and supports." Having NQF consider the NCI measures supports the value that the consumer's input is important towards improving long-term services and support (LTSS).

The endorsement of the specific domains covered in the NCI measure under review: person-centered planning, community inclusion, choice and control, and human rights provide information on the consumer's experience. These measures align with the HCBS quality measure framework that covers the three critical processes and outcomes of a vision of high-quality care in the areas of choice and decision making, community participation, and experience of care.

The addition of NCI measures will improve the monitoring of supports experienced by people with intellectual and developmental disabilities to achieve their person-centered goals and outcomes of living a good life.

Lastly, the NCI survey is updated to remain relevant to the changing initiatives regarding the quality of care, quality of life, and community inclusion. The NCI measures will add and/or complement the NQF/ HCBS quality framework for assessing HCBS services and support and the design of the system to deliver quality services.

Thank you for the opportunity to provide comment and support for the endorsement of the NCI measures.

Developer Response

N/A

NQF Response

Thank you for your comment.

NQF Committee Response

N/A