

NYSDOH Public Comment Overview

Agency Overview

The New York State Department of Health (NYSDOH) is responsible for evaluating quality and oversees the collection of health care quality performance data. Items available for public comment include proposed new and revised measures.

Measure Development Process

The Department uses a consensus development process that involves a rigorous review of published guidelines, scientific evidence, and feedback from multi-stakeholder advisory panels, including the Office of Quality and Patient Safety, the Office of Health Insurance Programs, the Office of Alcohol and Substance Abuse, and the Office of Mental Health.

Synopsis

The Department seeks feedback on the proposed new measures and changes to existing measures for the 2020 Value-Based Payment (VBP) Quality Measure set and 2020 Quality Assurance Reporting Requirements by **Friday, December 20, 2019**.

Submitting

Please submit all comments using the spreadsheet provided via email to: nysqarr@health.ny.gov by **Friday, December 20, 2019**.

Value Set Directory

Any code tables not attached to the measure specifications are from the HEDIS 2020 Value Set Directory. A **value set** contains the complete set of codes used to identify the service or condition included in the measure.

Items for Public Comment

NYSDOH seeks comments on the following proposed measure for inclusion in the 2020 Value-Based Payment (VBP) HARP Quality Measure Set and the 2020 Quality Assurance Report Requirements for the HARP Product Line:

Proposed New Measure

1. *Completion of Home and Community Based Services Annual Needs Assessment*

NYSDOH also seeks comments on proposed modifications to the following NYS Community Mental Health (CMH) measures which are included in the 2020 Value-Based Payment (VBP) HARP Quality Measure Set and the 2020 Quality Assurance Report Requirements for the HARP Product Line:

Proposed Changes to Existing Measures

1. *Employed, Seeking Employment or Enrolled in a Formal Education Program*
2. *Stable Housing Status*
3. *No Arrests in the Past Year*

Proposed New Measure ***Completion of Home and Community Based Services Annual Needs Assessment***

The Department seeks comments on the proposed measure for inclusion in the 2020 Value-Based Payment (VBP) HARP Quality Measure Set and the 2020 Quality Assurance Report Requirements for the HARP Product Line:

1. *Completion of Home and Community Based Services Annual Needs Assessment*. The percentage of members enrolled in a HARP with a completed HCBS annual needs assessment.

A Health and Recovery Plan (HARP) is a managed care product that manages physical health, mental health, and substance use services in an integrated way for adults with significant behavioral health needs (mental health or substance use). Care management is an important part of being in a HARP. Individuals identified as HARP eligible must be offered care management through State-designated Health Homes (HH). HARP enrollment of eligible individuals began in New York City in October 2015, and the rest of NYS began in July 2016. HARP eligible members are identified by the State on an ongoing basis and shared with the HARP plans, which will make assignments to Health Homes.

SUMMARY OF CHANGES for 2020

- First-year measure.

Description

The percentage of members enrolled in a HARP with a complete HCBS annual needs assessment during the measurement year.

Definitions

HCBS Annual Needs Assessment	The annual needs assessment will be conducted using the Community Mental Health Behavioral Health HCBS Eligibility screen.
Valid Screen	The screen is complete (neither signed date nor completed assessment date are missing) and not a test record.

Eligible Population

Product Lines	HARP
Ages	21 – 64 years old at the time of screening. Age is calculated as of December 31 of the measurement year.
Continuous Enrollment Health Plan	Enrolled in the same HARP plan for the last 6 months of the measurement year.
Allowable Gap	No more than one gap in enrollment of up to 30 days during the continuous 6-month continuous enrollment period.
Benefits	Medical, Mental Health, and Chemical Dependency
Anchor date	December 31 of the measurement year.

Administrative Specification

Denominator The eligible population

Numerator Criteria for inclusion in the numerator, at screen:

Screen Assessment Date: Between January 1 to December 31 of the measurement year.

AND

The date the assessment was signed is not missing.

NYSDOH seeks feedback on these measures, the technical specifications, and responses to the following questions:

1. What actions can NYS take to increase the screening rate?

Proposed Changes to Existing Measures for NYS 2020: Community Mental Health (CMH) Measures

The Department seeks comments on the proposed measures for inclusion in the 2020 Value-Based Payment (VBP) Quality Measure Set and the 2020 Quality Assurance Report Requirements (QARR) for the HARP Product Line.

These measures describe individuals' status for three measures of functioning used in mental health and substance use treatment. A recovery model of care emphasizes and supports a person's potential for recovery by optimizing quality of life and reducing symptoms of mental illness and substance use disorders through empowerment, choice, treatment, educational, employment, housing, and health and well-being goals. The specific outcomes used in these measures include employment and educational status, housing, and criminal justice activity.

Health plans will not be responsible for the calculation of these measures. These measures will be calculated and reported by New York State using the NYS Community Mental Health Eligibility Assessment. HARP members are required to be assessed for Behavioral Health Home and Community Based Services (BH HCBS) eligibility using the NYS Community Mental Health Eligibility Assessment at the time of enrollment and at least annually thereafter.

The measures were field-tested with 2018 Community Mental Health (CMH) assessed members enrolled in a HARP health plan. If an individual had more than one assessment during the measurement year, the most recent assessment was used to calculate the measures.

- *Employed, Seeking Employment or Enrolled in a Formal Education Program* - Average performance was 29% percent with variation across Community Mental Health (CMH) assessed members.
- *Stable Housing Status* - Average performance was 90% percent with variation across Community Mental Health (CMH) assessed members. There was a 16 percent gap in performance which indicates an opportunity for improvement.
- *No Arrests in the Past Year* - Average performance was 95% percent with variation across Community Mental Health (CMH) assessed members.

Low rates of assessment among HARP members is an issue with implementation of these three measures. Just over 30,000 of the approximately 137,000 HARP members have ever been assessed. In 2017, 39% of HARP members were enrolled in a Health Home and 10% were assessed.

NYSDOH seeks feedback on these measures, the technical specifications, and responses to the following questions:

1. Considering the low rates of assessment, is implementation of these three measures feasible?
2. Is measure data usable?
3. What actions can NYS take to increase the screening rate?
4. What alternatives exist for collecting information related to employment, housing, and criminal justice for the HARP population?

Proposed Changes to:

Employed, Seeking Employment, or Enrolled in a Formal Education Program

SUMMARY OF CHANGES for 2020

- Name Change: from *Maintaining/Improving Employment or Higher Education Status* to *Employed, Seeking Employment or Enrolled in a Formal Education Program*
- Change description to: The percentage of Community Mental Health (CMH) assessed members who were employed, seeking employment, or enrolled in formal education at the second
- Intake Period: Change to current measurement year.
- Reduce number of required screens from two to one.
- Eligible Populations proposed changes:
 - 21 to 64 years old at **time** of screening.
 - Enrollment: At least 6 months in the same HARP prior to screen.
 - Allowable Gap: No more than gap in enrollment of up to 30 days 6 months prior to latest screen.
 - Anchor Date: Change to latest screen in measurement year.
 - Event/Diagnosis: Change to screen during the measurement year.
- Expand numerator compliance to include: *Unemployed, Seeking Employment*.

Description

The percentage of Community Mental Health (CMH) assessed members who were employed, **seeking employment**, or enrolled in a formal education program.

Definitions

Intake Period	January 1 through December 31 of the year prior to the current measurement year.
Screen	The last valid Community Mental Health Behavioral Health Home and Community Based Services (CMH BH HCBS) Eligibility Screen in the intake period.
Valid Screen	The screen is complete (neither signed date nor completed assessment date are missing), not a test record, and not a duplicate screen.

CMH BH HCBS Eligibility Screen items used in measure:

Employment Status:

1. Employed
2. Unemployed, seeking employment
3. Unemployed, not seeking employment

Enrolled in Formal Education Program

1. No
2. Part-time
3. Full-time

Eligible Population

Product Lines	HARP
Ages	21 – 64 years old as of January 1 of the measurement year at the time of screening.

Continuous Enrollment	Enrolled on the date of Screen One through the date of Screen Two in the same HARP for at least 6 months prior to the latest screen date in the measurement year.
Allowable Gap	No more than one gap in enrollment of up to 30 days between Screen One and Screen Two in the 6 months prior to the latest screen date in the measurement year.
Anchor Date	The date of Screen Two latest screen date of the measurement year.
Benefits	Medical, Mental Health, and Chemical Dependency
Event/Diagnosis	Follow the steps below to identify the eligible population.
Step 1	<ul style="list-style-type: none">Identify members with at least one valid Community Mental Health BH HCBS Eligibility Screen during the measurement year and at least one valid Community Mental Health BH HCBS Eligibility Screen in the year prior to the measurement year. The screens must be 335-456 days apart select the screen with the latest assessment date. A valid Community Mental Health BH HCBS Eligibility Screen must meet the following criteria:<ul style="list-style-type: none">Signed date is not missing ANDCompleted assessment date is not missing ANDThe screen is not a duplicate screen. Duplicate screens occur within 30 days of one another, have the same assessment reason, and are done by the same health home. When duplicate screens are found, the screen that has the more recent completed assessment date or signed date, and/or is more complete, and/or has few demographic item errors should be kept.
Step 2 - Exclusions	<ul style="list-style-type: none">Exclude members where employment status <u>and</u> enrolled in formal education program are missing on Screen Two.

Administration Specification

Denominator	The eligible population
Numerator	Criteria for inclusion in the numerator is shown below: <ul style="list-style-type: none">Employment status:<ul style="list-style-type: none">EmployedORUnemployed, seeking employmentEnrolled in formal education program:<ul style="list-style-type: none">Part-timeORFull-time

Proposed Changes to: *Stable Housing Status*

SUMMARY OF CHANGES for 2020

- Change Measure Name: Maintenance of Stable or Improved Housing Status to Stable Housing Status
- Remove Maintenance of and or Improved Housing from description.
- Intake Period: Change to current measurement year.
- Reduce number of required screens from two to one.
- Screen Validity: Add Other, SUD Residential Program, and SUD Permanent Supportive Housing.
- Eligible Populations changes:
 - 21 to 64 years old at time of screening.
 - Enrollment: At least 6 months in the same HARP prior to screen.
 - Allowable Gap: No more than gap in enrollment of up to 30 days 6 months prior to latest screen.
 - Anchor Date: Change to latest screen in measurement year.
 - Event/Diagnosis: Change to screen within measurement year.
 - Exclusions: Add exclusion of members with the following Residential/Living Status at the time of screening:
 - DOH adult home
 - Long-term care facility (nursing home)
 - Rehabilitation hospital/unit
 - Hospice facility/palliative care unit
 - Acute care hospital
 - Correctional facility
- Expanded numerator compliance to change the following stable housing statuses at the time of assessment:
 - SUD residential program (add)
 - SUD permanent supportive housing (add)
 - DOH Adult Home (remove)

Description

The percentage of Community Mental Health (CMH) assessed members with stable housing status (private home, supportive housing, or community residence program) ~~maintenance of stable or improved housing status~~.

Definitions

Intake Period	January 1 through December 31 of the year prior to the current measurement year.
Screen	The last valid Community Mental Health Behavioral Health Home and Community Based Services (BH HCBS) Eligibility Screen in the intake period.
Valid Screen	The screen is complete (neither signed date nor completed assessment date are missing), not a test record, and not a duplicate screen.
	CMH BH HCBS Eligibility Screen Items used in measure:
	Residential/Living status at the time of assessment
	1. Private home / apartment / rented room
	2. DOH adult home
	3. Homeless - shelter

4. Homeless - street
5. Mental Health supported/supportive housing (all types)
6. OASAS/SUD community residence
7. OCFS/ACS/DSS Community Residential Program (Family Foster Care Group Home, Therapeutic Foster Care)
8. OPWDD community residence
9. Long-term care facility (nursing home)
10. Rehabilitation hospital/unit
11. Hospice facility/palliative care unit
12. Acute care hospital
13. Correctional facility
14. Other
15. SUD residential program
16. SUD permanent supportive housing

Eligible Population

Product Lines	HARP
Ages	21 – 64 years old as of January 1 of the year prior to the measurement year at the time of screening.
Continuous Enrollment	Enrolled in the same HARP for at least 6 months prior to the latest screen date in the measurement year. Enrolled on the date of Screen One through the date of Screen Two.
Allowable Gap	No more than one gap in enrollment of up to 30 days in the 6 months prior to the latest screen date in the measurement year. between Screen One and Screen Two
Anchor Date	The date of Screen Two last screen date of the measurement year.
Benefits	Medical, Mental Health, and Chemical Dependency
Event/Diagnosis	Follow the steps below to identify the eligible population.
Step 1	<ul style="list-style-type: none">• Identify members with at least one valid Community Mental Health BH HCBS Eligibility Screen during the measurement year and at least one valid Community Mental Health BH HCBS Eligibility Screen in the year prior to the measurement year. The screens must be 335-456 days apart select the screen with the latest assessment date. A valid Community Mental Health BH HCBS Eligibility Screen must meet the following criteria:<ul style="list-style-type: none">– Signed date is not missing AND– Completed assessment date is not missing AND– The screen is not a duplicate screen. Duplicate screens occur within 30 days of one another, have the same assessment reason, and are done by the same health home. When duplicate screens are found, the screen that has the more recent completed assessment date or signed date, and/or is more complete, and/or has few demographic item errors should be kept.

**Step 2 -
Exclusions**

- Exclude members ~~where Residential/Living status at time of assessment is Missing or Other on Screen Two~~ with the following values for RESIDENTIAL/LIVING STATUS AT TIME OF ASSESSMENT:
 - DOH adult home
 - Long-term care facility (nursing home)
 - Rehabilitation hospital/unit
 - Hospice facility/palliative care unit
 - Acute care hospital
 - Correctional facility
 - Other
 - Missing

Administrative Specifications

Denominator The eligible population

Numerator The number of Community Mental Health (CMH) assessed members with stable housing status. Criteria for inclusion in the numerator is shown below:

Residential/Living status at time of assessment:

- Private home / apartment / rented room
- ~~DOH Adult Home~~
- Mental Health supported/supportive housing (all types)
- OASAS/SUD community residence
- OCFS/ACS/DSS Community Residential Program (Family Foster Care Group Home, Therapeutic Foster Care)
- OPWDD community residence
- SUD residential program
- SUD permanent supportive housing

Proposed Changes to: ***No Arrests in the Past Year***

SUMMARY OF CHANGES for 2020

- Current Measure Name: No or Reduced Criminal Justice Involvement.
- Change description to *No Arrests in the Past Year*.
- Intake Period: Change to current measurement year.
- Reduce number of required screens from two to one.
- Eligible Populations changes:
 - 21 to 64 years old at **time** of screening.
 - Enrollment: At least 6 months in the same HARP prior to screen.
 - Allowable Gap: No more than gap in enrollment of up to 30 days 6 months prior to latest screen.
 - Anchor Date: Change to latest screen in measurement year.
 - Event/Diagnosis: Change to screen within measurement year with latest assessment date.
- Change numerator compliance from screen two to at the time of assessment.

Description

The percentage of Community Mental Health (CMH) assessed members with no ~~or Reduced Criminal Justice Involvement~~ arrests in the past year.

Definitions

Intake Period	The 12-month window starting on January 1 of the year prior to the measurement year and ending on December 31 of the year prior to January 1 through December 31 of the measurement year.
Screen	The first last valid Community Mental Health Behavioral Health Home and Community Based Services (BH HCBS) Eligibility Screen in the intake period.
Screen Two	The most recent valid Community Mental Health BH HCBS Eligibility Screen in the measurement year.
Valid Screen	The screen is complete (neither signed date nor completed assessment date are missing), not a test record, and not a duplicate screen. CMH BH HCBS Eligibility Screen Items used in measure: Police Intervention – Arrested with charges <ol style="list-style-type: none">1. Never2. More than 1 year ago3. 31 days - 1 year ago4. 8 - 30 days ago5. 4 - 7 days ago6. In last 3 days

Eligible Population

Product Lines	HARP
Ages	21 – 64 years old as of January 1 of the year prior to the measurement year at the time of screening.
Continuous Enrollment	Enrolled on the date of Screen One through the date of Screen Two in the same HARP for at least 6 months prior to the latest screen date in the measurement year.

Allowable Gap	No more than one gap in enrollment of up to 30 days between Screen One and Screen Two in the 6 months prior to the latest screen date in the measurement year.
Anchor Date	The date of Screen Two latest screen date of the measurement year.
Benefits	Medical, Mental Health, and Chemical Dependency
Event/Diagnosis	Follow the steps below to identify the eligible population.
Step 1	<ul style="list-style-type: none">Identify members with at least one valid Community Mental Health BH HCBS Eligibility Screen during the measurement year and at least one valid Community Mental Health BH HCBS Eligibility Screen in the year prior to the measurement year. The screens must be 335-456 days apart select the screen with the latest assessment date. A valid Community Mental Health BH HCBS Eligibility Screen must meet the following criteria:<ul style="list-style-type: none">Signed date is not missing ANDCompleted assessment date is not missing ANDThe screen is not a duplicate screen. Duplicate screens occur within 30 days of one another, have the same assessment reason, and are done by the same health home. When duplicate screens are found, the screen that has the more recent completed assessment date or signed date, and/or is more complete, and/or has few demographic item errors should be kept.
Step 2 Exclusions	<ul style="list-style-type: none">Exclude members where Police Intervention – Arrested with charges is missing on Screen Two.

Administrative Specification

Denominator	The eligible population.
Numerator	The number of Community Mental Health (CMH) assessed members who were never arrested with charges or were arrested with charges more than 1 year ago on Screen Two at time of assessment. Members with any of the following answers to the Police Intervention – Arrested with charges question on Screen Two Criteria for inclusion in the numerator is shown below: <ul style="list-style-type: none">Arrested with charges:<ul style="list-style-type: none">NeverMore than 1 year ago