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December 19, 2012

Marilyn Tavenner, Acting Administrator and Chief Operating Officer
Centers for Medicare & Medicaid Services (CMS)

Department of Health and Human Services

Attention: CMS-9962-NC

Mail Stop C4-26-05

7500 Security Boulevard

Baltimore, MD 21244-1850

Subject: CMS Request for Information Regarding Health Plan Quality in
Insurance Exchanges (CMS-9962-NC)

Dear Acting Administrator Tavenner:

The HIV Medicine Association (HIVMA) is pleased to offer comments on CMS's request for information regarding health plan quality in insurance exchanges (CMS-9962-NC). HIVMA represents nearly 5,000 medical providers and researchers who work on the frontlines of the HIV epidemic across the United States. One of our top priorities is to support expanded access to quality HIV care, including through development of clinical practice guidelines, continuing medical education programs and HIV-related quality measures.

We strongly support full and effective implementation of the health plan quality protection provisions of the Patient Protection and Affordable Care Act (ACA). We encourage CMS to ensure effective clinical quality measurement while minimizing the burden of data collection by aligning measures across programs. Such efforts should aim to facilitate comparability across health care plans, providers, and insurance markets, and promote delivery of high-quality and high-value health care.

We are pleased that HHS's strategy for establishing quality reporting requirements for health plans offered in the exchange marketplace includes the consideration of existing relevant quality measure sets and quality improvement initiatives, as well as characteristics of the population in a given geographic area served by a health insurance market.

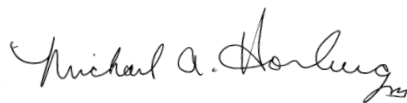
HIV-related quality measures have been approved by the National Quality Forum¹ and included in Medicare's Physician Quality Reporting System and Electronic Health Record Meaningful Use programs as well as the Initial Core Set of Health Quality Measures for Medicaid-Eligible Adults. The attached chart provides a more detailed overview of the current status of HIV/AIDS quality measures in terms of endorsement and inclusion in key quality measures sets.

For individuals living with or at risk of HIV infection, quality metrics for evaluating and monitoring the adequacy of health plan products should be informed by:

- Established clinical practice guidelines such as those maintained by the Department of Health and Human Services (HHS) (at www.aidsinfo.gov) and by medical professional societies (at www.hivma.org);
- HHS efforts to promote alignment of HIV clinical quality data collection across health care platforms and among public and private payers in support of the National HIV/AIDS Strategy¹ and its goals of earlier diagnosis through increased HIV testing, and effective linkage to and retention in care. ²Notably, in June, 2012, HHS identified seven indicator domains central to the HIV treatment continuum, six of which relate to clinical care: HIV testing, late HIV diagnosis, linkage to HIV medical care, retention in HIV medical care, antiretroviral therapy, viral load suppression;³
- The Institute of Medicine's March, 2012 report entitled: "Monitoring HIV Care in the United States: Indicators and Data Systems,"⁴ which identified 14 core HIV indicators, including 9 indicators for clinical HIV care and 5 for mental health, substance use, and supportive services. These measures are recommended for use at the local, state, and federal level, and provide a framework for agencies and clinics to measure the effectiveness of their programs.

Thank you for your consideration of our views, and please consider HIVMA as a resource as CMS moves forward with this important initiative. We look forward to working with you to ensure that the health insurance exchanges support expanded access to high quality, cost-effective, patient-centered HIV care. We can be reached through our Policy Officer, Kimberly Miller (kmiller@hivma.org or 703-740-4957) if we can be of any assistance or provide additional information.

Sincerely,



Michael Horberg, MD, MAS, FIDSA
Chair, HIVMA Board of Directors

¹ See the National Quality Forum's searchable directory at www.qualityforum.org/Measures_List.aspx. Search for "HIV."

Status of Human Immunodeficiency Virus (HIV) and Related Quality Measures

The HIV Medicine Association (HIVMA) and the Ryan White Medical Providers Coalition (RWMPC) support the development of standardized performance measures across health care platforms and payors to improve quality and coordination of HIV care. The chart below describes the current status of various HIV clinical quality measures in terms of endorsements and inclusion in key quality measure sets.

Measure	Recommended National Measure ⁵ (HIVMA/HRSA/NCQA) ⁶	2013 Medicare PQRS Number ⁷	National Quality Forum (NQF) Number ⁸	HHS-Proposed Initial Core Set of Health Quality Measures for Medicaid-Eligible Adults	HRSA/HAB HIV Core Clinical Performance Measures	CMS Final Stage II EHR Meaningful Use Rule ⁹	HHS HIV/AIDS Core Indicators ¹⁰
<i>Tobacco Cessation Counseling</i>	--	226	0028	--	✓	--	--
<i>Retention in care</i>	✓	--	0403, 2079	✓	✓	✓	✓
<i>CD4 cell count</i>	✓	159	0404	--	✓	--	--
<i>PCP prophylaxis</i>	✓	160	0405	--	✓	✓	--
<i>Adolescents/adults prescribed ART</i>	✓	161	0406, 2083	--	✓	--	✓
<i>Achieving maximal viral control (provider level)</i>	✓	162	0407	--	--	✓	--
<i>Tuberculosis screening</i>	✓	--	0408	--	✓	--	--
<i>Gonorrhea/Chlamydia screening</i>	✓	205	0409	--	✓	--	--
<i>Syphilis Screening</i>	✓	208	0410	--	✓	--	--
<i>Hepatitis B screening</i>	✓	--	0411	--	✓	--	--
<i>Hepatitis B vaccination order</i>	✓	--	0412	--	✓	--	--
<i>High-risk sex screening</i>	✓	--	0413	--	HIV Risk Counseling	--	--
<i>Hepatitis C screening</i>	✓	--	0414	--	✓	--	--
<i>Injection drug use screening</i>	✓	--	0415	--	Substance Use Screening	--	--
<i>Influenza immunization</i>	✓	--	0522	--	✓	--	--
<i>Pneumococcal immunization</i>	✓	--	0525	--	✓	--	--
<i>HIV Screening for Patient at Risk of HIV</i>	--	--	0572	--	--	--	--
<i>Cervical Cancer Screening</i>	--	--	0032, 0579	--	✓	--	--
<i>Hepatitis B vaccination completed</i>	✓	--	--	--	--	--	--
<i>Achieving maximal viral control (system level)</i>	✓	--	2082	--	--	--	✓
<i>Lipid Screening</i>	--	--	--	--	✓	--	--
<i>Oral Exam</i>	--	--	--	--	✓	--	--

Measure	Recommended National Measure (HIVMA/HRSA /NCQA)	2011 Medicare PQRS Number	National Quality Forum (NQF) Number	HHS-Proposed Initial Core Set of Health Quality Measures for Medicaid-Eligible Adults	HRSA/HAB HIV Core Clinical Performance Measures	CMS Final Stage II EHR Meaningful Use Rule	HHS HIV/AIDS Core Indicators
Hepatitis/HIV Alcohol Counseling	--	--	--	--	✓	--	--
MAC Prophylaxis	--	--	--	--	✓	--	--
Mental Health Screening	--	--	--	--	✓	--	--
Toxoplasma Screening	--	--	--	--	✓	--	--
HIV Positivity	--	--	--	--	--	--	✓
Late HIV Diagnosis	--	--	1999 ¹¹	--	--	--	✓
Linkage to HIV Medical Care	--	--	2079, 2080	--	--		✓

Prepared by HIVMA and last updated 12/18/2012. For further information, contact: Kim Miller, HIVMA Policy Officer, at kmiller@hivma.org.

¹ “National HIV/AIDS Strategy for the United States,” The White House Office of National AIDS Policy, 2010.

² Gardner, Edward M. et al, “The Spectrum of Engagement in HIV Care and its Relevance to Test-and-Treat Strategies for Prevention of HIV Infection,” Clinical Infectious Diseases Volume 52, Issue 6 Pp. 793-800.

³ A seventh (non-clinical) HHS core indicator for HIV/AIDS relates to housing status. (Source: <http://blog.aids.gov/2012/07/identifying-common-core-indicators-to-monitor-hhs-funded-hiv-aids-prevention-treatment-and-care-services.html>).

⁴ Report accessed online 12/17/12 at: <http://www.iom.edu/Reports/2012/Monitoring-HIV-Care-in-the-United-States.aspx>

⁵ For adults with an HIV diagnosis.

⁶ Horberg et al, “Development of National and Multiagency HIV Care Quality Measures,” CID 2010:51 (15 September).

⁷ Measure included and assigned a number in CMS’ 2013 Physician Quality Reporting System (PQRS) Measures (accessed online 12/18/2012 at <http://www.cms.gov/apps/ama/license.asp?file=/PQRS/downloads/2013-PQRS-MeasuresGroupsSpecs-ReleaseNotes-SupportingDocs-11162012.zip>

⁸ NQF-endorsed standards can be accessed at: http://www.qualityforum.org/Measures_List.aspx

⁹ CMS Final Stage 2 EHR MU Rule released August 23, 2012 (accessed online 8/24/2012 at: <https://www.cms.gov/apps/media/press/release.asp?Counter=4441&intNumPerPage=10&checkDate=&checkKey=&srchType=1&numDays=3500&srchOpt=0&srchData=&keywordType=All&chkNewsType=1%2C+2%2C+3%2C+4%2C+5&intPage=&showAll=&pYear=&year=&desc=&cboOrder=date>)

¹⁰ On July 24, 2012, Secretary Sebelius approved a package of seven common core indicators that were generated following multiple consultations with a group of federal and non-federal stakeholders. Six of the seven measures are tracked here – the seventh, while an important concept to capture elsewhere, relates to housing status and is not a clinical quality measure per se (Source: www.blog.AIDS.gov accessed online 8/24/2012 at: <http://blog.aids.gov/2012/08/secretary-sebelius-approves-indicators-for-monitoring-hhs-funded-hiv-services.html>).

¹¹ Provisionally approved by NQF through its “Population Health Measures Endorsement Maintenance” process.