

2020 IHA Public Comments and Responses

#	Org Type	Element Name	Support Type	Comment	Response
All Other Comments					
44	PO - Physician Organization	All Other Comments	Support with modifications	For CWP, exclude telemedicine encounters from the denominator. There is no way to do strep testing and to have patients come in separately from the telemedicine visit to get a strep test is wasteful.	Thank you for your comment. It is an AMP program policy to align with measure steward's specifications whenever possible, to further enable alignment with regional and national performance measurement and benchmarking efforts. Your comments were reviewed by the measure steward (NCQA) who provided the following response: The intent of allowing telemedicine in the CWP measure is to ensure telehealth visits, where a physician made a diagnosis of pharyngitis, count towards the measure. The measure allows a 7-day period (3 days before the diagnosis date through 3 days after the diagnosis date) for a member to receive a strep test. For appropriate care, antibiotics medications should not be dispensed prior to the confirmation of bacterial infection. If a member was unable to receive a strep test, and antibiotics medications were not dispensed, the member is not counted for reporting (i.e. the member will not be captured in the measure's denominator or numerator). That said, your comment has been noted and considerations for telehealth inclusion in the CWP measure will be re-evaluated by NCQA's measurement advisory panels, during the next revision to the HEDIS measure. The AMP program will align specifications based on any future revisions.
45	Plan	All Other Comments	Support	<p>We would like to request IHA to align their Commercial HMO measure set with the Quality Rating System (QRS) measures. Based on our reconciliation of both measure sets, the following measures are in both programs: Controlling High Blood Pressure, Proportion of Days Covered by Medications: Renin Angiotensin System Antagonists, Comprehensive Diabetes Care: Eye Exam, Comprehensive Diabetes Care: HbA1c Control < 8.0%, Comprehensive Diabetes Care: Medical Attention for Nephropathy, Breast Cancer Screening, Cervical Cancer Screening, Childhood Immunization Status: Combination 10, Chlamydia Screening in Women, Colorectal Cancer Screening, Immunizations for Adolescents: Combination 2, Appropriate Testing for Pharyngitis, Asthma Medication Ratio and Avoidance of Antibiotic Treatment for Acute Bronchitis/Bronchiolitis.</p> <p>We would also like to request adding in Weight Assessment & Counseling for Nutrition and Physical Activity for Children/Adolescents: BMI Percentile Documentation to the Commercial HMO measure set.</p>	<p>Thank you for your comment. IHA strives to align AMP measure sets with external measure sets that capture the most comparable patient population to each specific AMP program. As such, we prioritize alignment of the AMP Commercial HMO product line with measure sets such as NCQA's Commercial Health Plan Accreditation (HPA) measure set, because of the similarity in patient populations. While we do use the Quality Rating System (QRS) as a reference point for AMP measure sets, it does not capture as comparable of a patient population as other measure sets in the landscape.</p> <p>The Weight Assessment & Counseling for Nutrition and Physical Activity for Children/Adolescents: BMI Percentile Documentation measure was tested for use in the AMP Medi-Cal Managed Care product line in MY 2019 and was subsequently added as a baseline measure in this line for MY 2020 by the TMC at their meeting on October 30th. The TMC may consider inclusion of this measure in the AMP Commercial HMO product line in the future, particularly as it aligns with NCQA's Health Plan Accreditation (HPA) measure set. The TMC has chosen not to add this measure to the Commercial HMO measure set for MY 2020 and MY 2021, following its policy not to recommend to add as few measures as possible in preparation for transition to an updated timeline for AMP measure specification release beginning in 2021.</p>
46	PO - Physician Organization	All Other Comments	Support with modifications	2020/2021 Measure Specifications: Concurrent use of Opiates and Benzodiazepines- please add palliative care to the exclusion criteria. Also, in my opinion, you have set the target too low. Those of us with a low N may have a very difficult time hitting it.	Thank you for your comment. It is an AMP program policy to align with measure steward's specifications whenever possible, to further enable alignment with regional and national performance measurement and benchmarking efforts. Your comments were reviewed by the measure steward (PQA) who provided the following response: PQA is currently evaluating a palliative care exclusion for the Concurrent use of Opiates and Benzodiazepines (COB) measure. If approved through our consensus-based measure update process, this changes would be included in the MY2022 AMP specifications.