



Health Policy Commission
Commonwealth of Massachusetts
Two Boylston Street
Boston, MA 02116

April 3, 2014

Massachusetts Health Quality Partners (MHQP) is pleased to provide comments on the proposed standards of certification for Patient-Centered Medical Homes (PCMH) in the Commonwealth.

Founded in 1995, MHQP is a broad-based coalition of physicians, hospitals, health plans, purchasers, patient and public representatives, academics, and government agencies working together to promote improvement in the quality of health care services in Massachusetts. Our mission is to drive measurable improvements in health care quality, patients' experiences of care, and use of resources in Massachusetts through patient and public engagement and broad-based collaboration among health care stakeholders. Massachusetts has been on the forefront in the transformation of our nation's health care system and MHQP is committed to working with HPC to support further advancement of health care in our community.

We applaud this PCMH initiative's alignment with established national and local efforts to implement the patient-centered model of care. MHQP's stakeholders are diverse in their perspectives, but all recognize the inherent value in finding common ground around standards of care, quality measurement and the evaluation of care. A PCMH certification program that is well founded in the substantial work that has been done to develop existing standards will be more easily adopted and implemented and will more rapidly produce the desired systemic change. As the state develops more specific requirements, it will be important that HPC continue to look for opportunities to align efforts and collaborate around care improvement. MHQP stands ready to contribute to this work.

Employing standard quality measurement tools and data collection processes and producing trusted, valid, reliable measurement is essential to efforts to transform and improve care.

MHQP's successful track record of collaborative statewide multi-payer patient experience and clinical quality measurement programs, which have included private and public reporting of results since 2005 and are currently used in health plan and provider incentive programs, represent our ongoing efforts to transform and improve care. MHQP's measurement of patient experience uses the CAHPS PCMH survey tool as its basis and provides a way to evaluate practice performance in key areas of patient-centered care, including care coordination, access to care, communication and integration of behavioral health into the primary care setting. Clinical quality measurement provides complementary information about preventive care and chronic care management based on evidence-based HEDIS measures. Supporting and expanding existing measurement efforts would provide HPC with an efficient and effective way to evaluate performance on standards over time, an important part of implementing pay-for-performance programs and program evaluation.

Making information about health care quality available and understandable to the public is essential to a health care system that is transparent and functional. Looking forward, as our health care system becomes more patient-centered and patients assume a greater role in their care, they and their families must have access to the information they need to make health care choices. MHQP strongly supports standards designed to support patients' involvement in their care. This past year, MHQP has worked with our consumer stakeholders, providers and information designers to develop a new consumer-facing website that will be launched in the spring of 2014 and will report quality measurement results to the public. MHQP encourages HPC to support existing efforts to make information about quality of care widely available to the public and to consider making public reporting of quality results a PCMH certification standard.

MHQP is working in multiple ways to bring constituencies together to support the provision of patient-centered, high quality care in Massachusetts. In addition to those efforts already mentioned, MHQP is engaged in the following programs:

- The Greater Boston chapter of Robert Wood Johnson Foundation signature effort, Aligning Forces for Quality (AF4Q) - MHQP is the convening organization and has been working on a number of initiatives designed to improve care at the community level in the Greater Boston area.

- Practice Pattern Variation Analysis (PPVA) - MHQP is working with member health plans and a broad multi-stakeholder group composed of physician organizations, employers, and consumers to create a statewide Practice Pattern Variation Analysis (PPVA) program. Health plan data from the Massachusetts All Payer Claims Database is being used to determine the health conditions in Massachusetts with the highest costs and greatest variation in practice. Utilization patterns will be detailed and the key drivers of this variation will be determined and unexplained variation will be explored with providers. Stakeholders will discuss programs that can be developed to improve quality while reducing unnecessary and costly variation in the use of services.
- The Massachusetts Child Health Quality Coalition (CHQC) is a broad, multi-stakeholder initiative with initial funding through the five-year CMS CHIPRA Quality Demonstration grant awarded to Massachusetts. Its mission is to champion and advocate for child health quality and measurement, facilitate a shared understanding of pediatric health care quality priorities, create a platform for formulating system-wide goals and objectives, and implement activities to support those goals and objectives.
- Partners in Integrated Care – This program focuses on incorporating evidence-based screening tools and intervention services for depression and unhealthy alcohol and substance use into routine primary care for adults in the primary care office setting. MHQP supports the training of the selected primary care practices in the use of screening tools and interventions that can be implemented within the primary care office.
- Preventive Care Guidelines - MHQP has been producing preventive care guidelines recommendations since 2001. Previously, health plans and other provider organizations each developed and distributed their own preventive care guidelines for clinicians to follow. Our goal in coming together to endorse a single set of guidelines is to support clinicians' efforts to provide high-quality, evidence-based care and eliminate inconsistent guidelines. MHQP works with health care organizations across the state to ensure that these guidelines represent updated standards in quality preventive care.

These efforts and others illustrate MHQP's longstanding commitment to collaboration and innovation to improve care in Massachusetts. In the interest of reducing duplication of effort and improving efficiency, we strongly urge the HPC and the PCMH Certification Program to leverage

MHQP's expertise and experience, as well as that of our collaborators, to support further development of standards.

Thank you for the opportunity to submit comments. We believe there is great potential for diverse constituencies to work together to improve the quality of health care for citizens of Massachusetts. We support the implementation of a Massachusetts PCMH Certification program and offer our help in further developing standards and practices to support it.

Sincerely,

A handwritten signature in black ink that reads "Barbra G. Rabson". The signature is written in a cursive style with a large initial 'B'.

Barbra Rabson, Executive Director
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