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TO: Health Policy Council
FR: Patricia Edraos, Health Resources/Policy Director
RE: Proposed Health Policy Council PCMH Certification Criteria
DT: March 31, 2014

The Massachusetts League of Community Health Centers (the League) is pleased to provide comments on the proposed Patient Centered Medical Home (PCMH) Certification Criteria.

Established in 1972, the Massachusetts League of Community Health Centers ("the League") is a non-profit, statewide association representing and serving the needs of the state's 50 community health centers. The League serves as an information source on community-based health and provides a wide range of technical assistance to its members and communities, including: analysis of state and federal health regulatory and policy issues; training and education for health center staff and board members; promotion and management of clinical quality initiatives across the health center network; workforce development initiatives; information technology development; and support to expand access through work with local health and advocacy organizations seeking to open health centers in their communities.

The League's PCMH activity: With respect to PCMH, during the past three years, the League has provided a learning environment which includes in-person learning sessions, virtual learning via webinars, and team based conference calls with site-based practice coaching through Medical Home Facilitators to support those health centers participating in both a national Safety-Net Medical Home Initiative (SNMHI) and the Massachusetts state-sponsored PCMH Initiative. It is in the process of developing technical assistance for the health centers participating in the Primary Care Payment Reform Initiative. In order to build the League's training and technical assistance capacity in this work, the League has trained its staff in a broad array of quality improvement techniques, participated on national and state workgroups on the emerging model, identified practice facilitators, coaches and medical home facilitators, and collaborated with technical experts in the development of patient registries, EMR reporting functionality, and staff training in the use of data to drive performance.

Community Health Center PCMH activity: Community Health Centers were begun in the late 1960's in order to provide high quality, comprehensive primary care to individuals and families, and to do this without respect to linguistic, cultural, or financial barriers to care. Community health centers have developed their services to meet the needs of their communities, leading them to provide not only the medical services, but also behavioral health, social services, as well as dental, optometry and other needed services. Well before the concept of Patient Centered Medical Home was coined, the health centers strove to be that for their patients, and continue to do so.

All community health centers undergo rigorous on-site accreditation visits, in the case Federally Qualified Health Centers (FQHC) by the Bureau of Primary Health and JCAHO or, in the case of Hospital Licensed Health Centers (HLHC) through the hospitals by which they are licensed. Massachusetts federally-funded health centers consistently top national goals for assisting prenatal patients in their first trimester and in preventing low birth babies among their patient populations. They also surpass federal benchmarks for helping patients quit smoking and manage hypertension. When compared with other states, Massachusetts health centers score above the national average for a range of patient health measures, including colorectal and cervical cancer screening, diabetes and blood pressure control, tobacco use assessment, childhood immunizations and lipid level management.

With respect to PCMH recognition, as of 2012, 26 of the 37 Federally Qualified Health Centers (70%) had achieved PCMH recognition through an accredited organization. We do not currently have information on our 13 Hospital-licensed health center member centers but many are also involved in PCMH and related accreditation efforts through state and hospital initiatives. Additional health centers are in the process of achieving national certification.

Level III NCQA Recognition on 2008 Standards	2 FQHCs (currently reapplying)
Level III NCQA Recognition on 2011 Standards	9 FQHCs
Level II NCQA Recognition	8 FQHCs
Level I NCQA Recognition	4 FQHCs
JCAHO Recognition	3 FQHCs

Our comments: As noted above, community health centers not only support the concept of creating patient centered medical homes for their patients, but are deeply involved in becoming certified as such through NCQA.

Our major comment, and request, is that the state certification requirements be aligned with the federal (NCQA) or (JCAHO) standards and that practices which achieve NCQA or JCAHO certification will be deemed to have met the state standards. A separate, and essentially redundant, process will simply mean adding additional reporting and administrative costs and subtracting from the time that our providers could be spending with their patients. As noted in the Massachusetts Medical Society comments, accepting national certification appears to be consistent with Section 14 (b) of Chapter 224 of the Acts of 2012.

We also request that the NCQA standards be adopted in their entirety. What may be viewed as a small change by regulators or certification agencies often causes significant problems and expense when it must be incorporated into an already complicated electronic medical record.

Finally, we have found that meeting the certification standards for NCQA PCMH is resource-intensive and suggest that the Council consider offering enhanced payments to practices to assist them to make progress toward, and to retain, PMCH certification.

Thank you for your interest. If you have further questions, please contact me at 617-988-2236 or pedraos@massleague.org.