



AMERICAN ACADEMY OF
FAMILY PHYSICIANS
STRONG MEDICINE FOR AMERICA

February 23, 2011

Nancy Wilson, M.D., M.P.H.,
Coordinator of the Advisory Council Subcommittee
Agency for Healthcare Research and Quality
Room 3028
540 Gaither Road Rockville, MD 20850

Dear Dr. Wilson:

On behalf of the American Academy of Family Physicians (AAFP), which represents more than 97,600 family physicians and medical students nationwide, I am writing in response to the *Medicaid Program: Initial Core Set of Health Quality Measures for Medicaid- Eligible Adults* regulation as published in the December 30, 2010 Federal Register.

The AAFP supported passage of the *Affordable Care Act* and was pleased that it included Section 2701, which mandates that the U.S. Department of Health & Human Services identify and publish for public comment a recommended, initial core set of health quality measures for Medicaid eligible adults. The AAFP appreciates the opportunity to comment on this initial set of quality measures both as a longstanding supporter of quality improvement efforts and because over three-quarters of family physicians participate in Medicaid.

The AAFP offers the Agency for Healthcare Research and Quality (AHRQ) the following feedback on specific measures:

- **Measure #2 Adult Weight Screening and Follow up.** Since this measure was developed by the Centers for Medicare & Medicaid Services (CMS), the AAFP urges AHRQ to utilize the newer and more clinically appropriate "Recording Body Mass Index" measure as developed by the National Committee for Quality Assurance. It is AAFP's enduring policy that quality measures developed by provider groups or medical specialty societies should follow the American Medical Association convened Physician Consortium for Performance Improvement® process. In addition, all measures should be eventually endorsed by the National Quality Forum (NQF) using the measure criteria and following the normal consensus development process used by the forum.
- **Measures #8, #38 - #42, #47, #48, #50, and #51.** The AAFP asks AHRQ to explain why measures that are not endorsed by the NQF are included in this initial core set. If the NQF consciously did not endorse these measures, the measures should be removed from this program. If the measures were not yet submitted to the NQF for their endorsement, then this should be clearly noted.
- **Measures #9 - #21.** As noted in the regulation, these measures are associated with the AHRQ's Prevention Quality Indicators program. These measures focus on hospital admissions or inpatient

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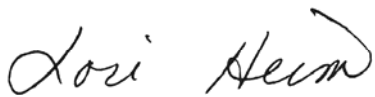
procedures. In essence, these measures rate a community and it is therefore difficult to accurately attribute accountability for any observed improvements or deteriorations. The AAFP believes these measures are more appropriate albeit an imprecise method for evaluating the overall effectiveness, enrollment rates, and access to healthcare for the Medicaid program in a community, but are not appropriate for a quality improvement effort for healthcare providers.

- *Measures #47, #48, #50 and #51.* These measures are more appropriate for Medicaid policies and payments, but are not fully appropriate for a quality improvement effort for healthcare providers.

We recommend you and your staff visit the AAFP's [Suggested Measures for Family Medicine](#) website as you further develop quality measures designed for the Medicaid adult population and other quality improvement programs.

On behalf of the AAFP, I again thank you and the staff at AHRQ for the opportunity to provide these comments for your review and will continue to support the agency's effort improve healthcare quality, reduce costs, advance patient safety, decrease medical errors, and broaden access to essential services. If we may be of further assistance on this, please contact Bruce Bagley, M.D., the medical director for quality improvement. He can be reached at 913-906-6000 ext. 4120 or by email at bbagley@aafp.org.

Sincerely,

A handwritten signature in cursive script that reads "Lori Heim".

Lori J. Heim, MD, FAAFP
Board Chair