July 5, 2012

Marilyn Tavenner
Acting Administrator
Centers for Medicare and Medicaid Services
Department of Health and Human Services
Centers for Medicare and Medicaid Services
Attention: CMS-0044-P
P.O. Box 8013
Baltimore, MD 21244-8013

Dear Ms. Tavenner,


Filed electronically via www.regulations.gov on July 5th

On behalf of the American Dental Association and its 156,000 members, we appreciate the opportunity to provide comment on the proposed rule, 45 CFR Part 156, published in the Federal Register on June 5. Dentistry is committed to improving the oral health of the American public by providing the highest quality care. To this end, the American Dental Association (ADA), at the request of the Centers for Medicare and Medicaid Services (CMS), has taken the lead role in establishing the Dental Quality Alliance (DQA), a partnership of 29 entities interested in collaboratively advancing performance measurement to improve oral health, patient care and safety.

The DQA is engaged in developing quality and performance measures for Medicaid and Children’s Health Insurance Programs (CHIP). The DQA has identified several performance measures and is now engaged in conducting validity and reliability assessments of these measures. The DQA will develop measure specifications for claims-based data sources as well as for electronic health records.

The ADA offers the following comments regarding 45 CFR Part 156 [CMS–9965–P]: Patient Protection and Affordable Care Act; Data Collection to Support Standards Related to Essential Health Benefits; Recognition of Entities for the Accreditation of Qualified Health Plans. Specifically, the DQA is interested in the sections pertaining to clinical quality measures.

- The ADA applauds the Department of Health and Human Services (HHS) in including quality measures within accreditation standards for health plans.
- The ADA strongly supports that the clinical quality measure set must “Only include measures that are either developed or adopted by a voluntary consensus standards setting body (such as those described in the National Technology and Transfer Advancement of Act of 1995 (NTTAA) and Office of Management and Budget (OMB) Circular A–119 (1998)) or, where appropriate endorsed measures are unavailable, are in common use for health plan quality measurement and meet health plan industry standards”. The ADA further strongly recommends that HHS recognize the DQA as the voluntary consensus standards setting body for quality measures in dentistry.
- The ADA seeks clarification from HHS whether the National Committee for Quality Assurance (NCQA) and the Utilization Review Accreditation Commission (URAC) will be responsible for accrediting dental plans.
• The ADA strongly suggests that any designated accrediting entity should use specific clinical quality measures developed by the DQA, a voluntary consensus organization with broad representation that is engaged in developing quality measures for accrediting dental plans.
• The ADA also suggests that HHS require exchanges to make the clinical quality measure results and adult and child Consumer Assessment of Healthcare Providers and Systems (CAHPS) measure survey results obtained from the Qualified Health Plan (QHP) issuer’s accreditation survey data elements transparent to the public.
• In addition to the criteria specified for clinical quality measures on Page 33137, the ADA suggests that measures should:
  o Span a broad breadth of domains such as outcomes and process apart from access and patient satisfaction
  o Be risk-adjusted where appropriate
  o Be scientifically sound (Valid and Reliable)
  o Be periodically updated for use within the accreditation standards

The ADA appreciates the opportunity to comment on the proposed rule 45 CFR Part 156 [CMS–9965–P]: Patient Protection and Affordable Care Act; Data Collection to Support Standards Related to Essential Health Benefits; Recognition of Entities for the Accreditation of Qualified Health Plans. If there are questions concerning these comments, please contact Dr. Krishna Aravamudhan at 312-440-2772 or e-mail at aravamudhank@ada.org.

Sincerely,

President  Executive Director

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