March 9, 2015

To: n4a Members

From: Sandy Markwood, CEO

Re: n4a Survey on NCQA-Proposed Case Management Accreditation for Community-Based Organizations

Last month, the National Committee for Quality Assurance (NCQA) issued a notice requesting public comment on their proposed new Case Management (CM) for long-term services and supports (LTSS) accreditation product (referred to as “CM-LTSS”) for AAAs and other community-based organizations (CBOs). This expansion of accreditation into LTSS would be offered to AAAs and ADRCs engaged in case management activities, including any of the following: “assessment, planning, facilitation, care coordination, evaluation and advocacy for options and services to meet the comprehensive medical, behavioral health and psychosocial needs of an individual while promoting quality and cost-effective outcomes.”

NCQA notes that the overall goal of their new accreditation option is to encourage person-centered LTSS case management programs to help individuals remain in their home and community.

n4a applauds efforts to support the work of the Aging Network and initiatives that enhance high-quality, person-centered case management programs, a hallmark of AAA efforts for more than 40 years. However, we do recognize that any accreditation product must be carefully developed to reflect current and future agency resources, existing standards in the field and other factors that may vary from state to state. While accreditation would not immediately be a requirement for any AAA, history suggests that many states and other payers may begin to move toward requiring AAA case management accreditation for certain programs and funding sources should NCQA decide, as expected, to move forward with their plan to offer this accreditation program. For these reasons, n4a is engaged in this conversation and interested in your feedback.
To help us prepare our comments to NCQA we need your feedback before March 16 to understand how the proposed accreditation might impact your organization today and its plans for the future.

In our initial review of the proposed NCQA LTSS accreditation, we recognize that these proposed requirements have the potential to improve the ability of AAAs to contract directly with health payers and demonstrate the value of LTSS. However, we have specific questions and concerns regarding proposed new requirements and costs. Specifically, we are concerned that the requirements may strain AAA budgets by requiring substantial investments in IT infrastructures, enhanced training, expanded staffing, etc., and may place a significant burden on many smaller service providers.

Read the full NCQA proposed CM-LTSS accreditation product.

NCQA’s summary overview of the accreditation products and instructions.

- See pages 10-14 for the CM-LTSS summary and targeted questions;
  and
- See pages 27-28 for instructions on filing comments

To file comments on the proposal, click here (you will need to create a user name and password).

Action Requested:

1) Please take n4a’s short survey by March 16, to let us know how the proposed NCQA accreditation product would affect your agency. n4a will use your feedback to help craft an appropriate response to NCQA by their March 23 deadline.

2) We also encourage your AAA and others (e.g., other CBOs, service providers, etc.) to submit comments directly to NCQA on their public comments page by March 23 (if you do, please share a copy with n4a: pcantrell@n4a.org).

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1 NCQA is a private, non-profit accrediting agency with a 25-plus-year history offering accrediting products for health care management industries.

ii NCQA does not accept mail, email or faxed comment letters. Comments must be entered in NCQA’s web-based comment database and that system requires selection of a product (in this case CM-LTSS), the topic and element, choosing your agency’s level of support for that element, and a comments text box for your rationale.