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The Special Needs Plan Alliance (SNP Alliance) is a national, non-profit thought leadership organization addressing the needs of high-risk and high-cost complex care populations with chronic conditions through specialized managed care. The Alliance is the only organization exclusively representing Medicare Advantage Special Needs Plans – Dual SNPs (D-SNPs), Institutional SNPs (I-SNPs) and Chronic Condition SNPs (C-SNPs).

We provide detailed comments on the Medicare Health Outcomes Survey and proposal to collect information from Medicare beneficiaries with the survey to use in quality measurement and performance evaluation. Please see our attached letter.

In summary, while we appreciate the intent, it is time to re-examine the Health Outcomes Survey. Both the instrument and the methodology need to be revised to support its use by CMS as a source document for measures in the MA Quality measurement system. Unfortunately, proposed changes in this PRA Notice fall short of what is needed in terms of revising the Health Outcomes Survey. Specifically concerns include:

- The small and unrepresentative sample (often less than 2% of the enrollment of the health plan)
- The low response rates to the HOS
- The lack of access to HOS among people who speak a language other than the four languages offered
- The lack of testing in ethnic populations
- The inability to determine source (positive or negative) of self-reported changes in health status
- The lack of attention to/data collection about several key medical and behavioral health conditions (e.g., self-reported neuromuscular diseases such as Parkinson's or ALS, Alzheimer's disease, or other immunological diseases, such as HIV/AIDs, or behavioral health conditions such as Substance Use Disorder)
- The lack of information about contextual issues when a respondent indicates a change in health status

The HOS limitations raise questions about the use of HOS-derived information to generate accurate results and therefore call into question the use of these data to measure performance.

Accurate, targeted measurement is critical to ensuring quality and efficiency of care.
Thank you for the opportunity to comment.