

DEPARTMENT OF HEALTH & HUMAN SERVICES
Centers for Medicare & Medicaid Services
7500 Security Boulevard, Mail Stop S2-01-16
Baltimore, Maryland 21244-1850



State Demonstrations Group

September 8, 2015

Judy Mohr Peterson
Med-QUEST Division Administrator
State of Hawaii, Department of Human Services
601 Kamokila Blvd, Room 518
PO Box 700190
Kapolei, HI 96709-0190

Dear Ms. Mohr Peterson:

The Centers for Medicare & Medicaid Services (CMS) has reviewed Hawaii's proposed evaluation design for the section 1115 demonstration, entitled, "QUEST Integration" (Project Number 11-W-00001/9).

We are attaching to this letter a copy of the draft evaluation design, which includes text edits and comments. Overall, our comments fall into the following categories:

- **General**: The plan should incorporate two new sections that provide additional background on the program. One section should describe the current enrollment and delivery system, including population by eligibility group, description of health plans and their enrollment. The second section should include a summary of the most recent evaluation results and recommendations.
- **Goals and Hypotheses**: The evaluation design should be revised so that the evaluation will focus on the authorities granted in the waiver and expenditure authorities of the Quest Integration demonstration. Each demonstration waiver and authority should have objectives, goals and hypotheses related to them. The hypotheses in the draft plan are general; they should be more specific and measurable.
- **Measures and Analysis**:
 - The plan should include quality of care measures for the provision of capitated long term care services. The current plan only proposes to calculate the percentage of individuals who receive LTSS in HCBS settings. The state should consider more robust measures such as looking at measures related to assessment for risk of fall or incontinence for both the institutionalized and in community population.

- It is not clear why the state proposed the first year of the Quest Integration demonstration as the baseline year, rather than the years prior to the implementation of the Quest Integration.
- In previous evaluations, the state has presented all HEDIS and CAHPS as statewide figures. These measures should also be provided as plan-specific data in order to meet evaluation objectives.
- The state should provide more information on the provider survey and response rates. For example, what information is provided on adequacy of specialists or behavioral health specialists? How reliable is the data if the response rates are less than 50%?
- The state should provide more detail on how encounter data will be used in the evaluation. In addition, the State should discuss analyses that have been conducted to assure the completeness and accuracy of encounter data.
- The state should clarify why it proposes not to continue to assess quality measures included in previous evaluations, such as Cholesterol Management for Patients with Cardiovascular Conditions and Chlamydia Screening in Women. Also, the evaluation design should specify the timeframes and process for how the state plans to modify or periodically update the measures used in the evaluation. For example, CMS updates the Child and Adult Core Set measures annually. It would be helpful to understand how updates such as these will be incorporated.

We have attached a copy of the QUEST Integration draft evaluation plan which includes additional comments and edits within the text of the document. Per the requirements outlined in STC 102, we expect the state to resubmit the evaluation plan to accommodate the changes outlined within this letter and the enclosure within 60 days of the date of this letter.

If you have any questions, please do not hesitate to contact your project officer, Mrs. Heather Ross. Mrs. Ross can be reached at (410) 786-3666, or at heather.ross@cms.hhs.gov. We look forward to continuing to partner with you and your staff on the QUEST Integration demonstration.

Sincerely,

/S/

Angela D. Garner
Director
Division of System Reform Demonstrations

Enclosure

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cc: Gloria Nagle, Associate Regional Administrator,
Region IX, San Francisco Regional Office