Review of HHS Report on Improving the Identification of Health Care Disparities in Medicaid and CHIP

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Overview

- Patient Protection and Affordable Care Act (ACA) provisions regarding disparities data
- Specific data elements in the Department of Health and Human Services (HHS) standards
- Summary of HHS Secretary's November 2014 report
- Potential areas for MACPAC comments

ACA Provisions

- Section 4302(a)
 - Develop data collection standards for race, ethnicity, sex, primary language, and disability status (released in October 2011)
- Section 4302(b)
 - Data collection on these five characteristics in Medicaid and CHIP
 - Evaluation of approaches for data collection

Specific Data Elements in HHS Standards

- The HHS standards released in 2011 include specifications to be applied to the following data elements in surveys conducted or sponsored by HHS to the extent practicable:
 - Race
 - Ethnicity
 - Sex
 - Primary language
 - Disability status

Specific Data Elements in HHS Standards – Race and Ethnicity

- Minimum based on 1997 OMB standards:
 - Racial groups: American Indian or Alaska Native, Asian, Black or African American, Native Hawaiian or Other Pacific Islander, and White
 - Ethnic group: Hispanic or Not Hispanic
 - Individuals may select more than one racial group (HHS includes more granular categories than OMB minimum)
- Points of interest for data collection and analysis:
 - Self-reports based on respondent definition of their own race and ethnicity are preferred
 - However, self-reports vary depending on respondent definition of their own race and ethnicity

Specific Data Elements in HHS Standards - Disability Status

- Definition varies depending on context
 - Administrative data often based on programmatic features such as basis of eligibility for Medicaid
 - Survey data often based on questions about functional ability
- Measurement and analysis of disability characteristics has not been consistent among different data sources
- HHS standard for survey data is a six-item set of questions

Summary of 2014 Report -**Implementation**

- Efforts to improve data collection of disparities measures
 - Modernized Medicaid and CHIP data infrastructure, including Transformed Medicaid Statistical Information System (T-MSIS)
 - Incorporation of HHS standards in patient experience surveys and streamlined enrollment application
- Efforts to improve data analysis and reporting of disparities measures
 - Use of core health care quality measures to identify and evaluate health care disparities
 - Promotion of data sharing, collaboration, and analyses between Centers for Medicare & Medicaid Services (CMS) and other HHS offices

Summary of 2014 Report – HHS Recommendations

- Improve the quality of federal health care disparities data, including the accuracy and completeness of data, across delivery systems
- Improve the completeness of health care disparities data collection in managed care

Potential Areas for Comment – Survey Data

- Importance of timely implementation of new data collection standards
- Importance of the five disparities measures mandated by the ACA, as well as additional measures

Potential Areas for Comment – Administrative Data

- Further efforts by CMS to improve completeness and quality of key variables in administrative data, particularly T-MSIS
- More complete and accurate data collection and reporting by the states

Potential Areas for Comment – Quality Measures

- Concern about the voluntary nature of data collection and provision by states to CMS
- Limited number of quality measures examined by demographic categories
 - For example, in the Adult Medicaid Quality Grant Program, 3 out of 4 selected adult quality measures are to be reported by test states for 2 out of 5 demographic categories (race, ethnicity, sex, primary language, disability)