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January 13, 2012

National Quality Forum
601 13th Street NW
Suite 500 North
Washington, D.C. 20005

Re: Draft Multiple Chronic conditions Measurement Framework

Dear Sir or Madam,

Care Continuum Alliance (CCA) is please to provide the following comments on the National Quality Forum's draft *Multiple Chronic Conditions Measurement Framework*.

CCA convenes all stakeholders along the continuum of care to improve the health of populations. Through advocacy, research and education, Care Continuum Alliance advances population health management strategies to improve care quality and health outcomes and to reduce preventable costs for the healthy and those at risk of or managing chronic conditions. Our diverse membership of more than 200 organizations and individuals includes physician groups, nurses, other health care professionals, hospital systems, wellness and prevention providers, population health management organizations, pharmaceutical manufacturers, pharmacies and pharmacy benefit managers, health information technology innovators, employers, researchers and academics.

Care Continuum Alliance (CCA) supports NQF's effort to clarify and streamline quality measures for individuals with multiple chronic conditions. The framework's emphasis on designing cross-cutting measures that assess quality in care transitions for those with multiple chronic conditions closely aligns with CCA's work on care transitions. Our Transitions in Care Workgroup compiled a case studies compendium highlighting lessons and successes in a variety of transitions in care programs. We also share NQF's goal to pair incentives for patients and providers with performance-based payment programs. This reinforces the role of incentives as an important tool within chronic care management programs and more broadly within Population Health Management strategies.

Our members' research has found that actively engaged patients have greater interest in improving self-care management and their health outcomes. This motivation is particularly important for patients with multiple chronic conditions because they generally have increased health care utilization and higher health costs, as dually noted in the NQF framework. CCA has developed Leading Practices in Consumer Engagement that would further inform and enhance this quality measures framework. We also encourage NQF to give additional consideration to the importance of medication adherence in improving health outcomes and reducing costs. Our *Outcomes Guidelines Report Vol. 5* clearly evidences how medication adherence is a critical element of chronic care management programs. CCA has developed a Medication Adherence Best Practices Framework that would complement NQF's work on this Multiple Chronic Conditions Framework.

CCA and our members would be glad to field questions, provide additional information and assist NQF in the future.

Thank you,

A handwritten signature in black ink, appearing to read "Tracey Moorhead". The signature is written in a cursive, flowing style.

Tracey Moorhead
President and CEO

TM/vi