NAMD Statement on the CMS Scorecard

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Washington, DC - As Medicaid Directors, we are committed to measuring performance in the Medicaid program to support both continuous improvement for the beneficiaries we serve and accountability to taxpayers. We have been involved for many years in diverse efforts to demonstrate Medicaid performance at the state and federal levels, including providing managed care report cards to consumers, using tools like CAHPS to test consumer experience, sharing performance data with state legislatures, and reporting on quality measures to the Centers for Medicare and Medicaid Services (CMS).

The CMS Scorecard released today is a “beta” version intended to advance a longer-term goal to improve understanding of Medicaid performance at a national level. The inclusion of federal performance measures – the first of its kind – is commendable. We appreciate being given the opportunity to provide input to CMS on its Scorecard and believe our engagement reflects CMS’s commitment to client service and partnership with state Medicaid Directors.

However, Directors have concerns about:

- The comparability, accuracy and timeliness of the data that is reported on the Scorecard; and
- Conclusions that may be drawn when making comparisons across states with significantly different structures and care delivery approaches.

To that end, Medicaid Directors are committed to continuing work with CMS to address those concerns, and to refine and improve data reporting ongoing. The following improvements are needed in the Scorecard to produce accurate and meaningful results.

- **Use an accurate and comparable data set.** There are significant methodological issues with the underlying data, including completeness, timeliness, and quality of the data. Examples of this include:
  - The fact that most of the data are sourced to CY2015;
In some cases, data reflect a state’s beneficiaries in fee-for-service or managed care, but not necessarily beneficiaries in both delivery models. This can result in relatively healthy populations being compared to those with disabilities or complex conditions;

Some states reported using an administrative only methodology (claims-based) while others used a hybrid methodology (claims and medical record review); and

Variability in completeness of reporting as Medicaid Adult and Child Core set measures have been voluntary to date.

While the Scorecard has been annotated to reflect some of those constraints, the measures remain problematic.

- **A meaningful context for using the data is needed.** The data used in the CMS Scorecard does not account for programmatic variation in Medicaid. A common axiom is: “You’ve seen one Medicaid program, you’ve seen one Medicaid program.” In other words, differences in eligible patient populations, covered benefits, delivery models, and types of measures used impact availability of data and calculation of results. Until these fundamental variances are addressed in the Scorecard, it will not be possible to make apples-to-apples comparisons between states.

Medicaid Directors are committed to better understanding the relative performance of our individual state Medicaid programs, and also the performance of the program as a whole. We take pride in the value that the Medicaid program delivers to beneficiaries and taxpayers, and we look forward to working with federal partners to refine and improve future iterations of public reporting on the program.

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The National Association of Medicaid Directors (NAMD) is a bipartisan, nonprofit, professional organization representing leaders of state Medicaid agencies across the country. NAMD supports Medicaid Directors in administering the program in cost-effective, efficient and visionary ways that enable the over 70 million Americans served by Medicaid to achieve their best health and to thrive in their communities. NAMD does this by offering programs for Medicaid Directors, elevating the consensus issues of Directors in the federal policy process, and serving as the trusted source for data and information about Directors. Learn more at http://www.medicaiddirectors.org and follow NAMD on Twitter @statemedicaid.