

November 15, 2022

TO: Marquita Cullom, Associate Director, Agency for Healthcare Research and Quality
FROM: National Alliance to Impact the Social Determinants of Health
RE: Comment on Request for Information on Person-Centered Care Planning for Multiple Chronic Conditions (MCC)

Dear Associate Director Cullom:

On behalf of the National Alliance to Impact Social Determinants of Health (NASDOH), we thank you for the opportunity to provide information on care and prevention of multiple chronic conditions (MCC). NASDOH is a group of stakeholders working to systematically and pragmatically build a common understanding of the importance of addressing social needs as part of an overall approach to health improvement. NASDOH brings together health care, public health and social services expertise, local community experience, community-convening competence, business and financial insight, technology innovation, data and analytics competencies, and policy and advocacy acumen to assess and address current regulatory frameworks, funding environments and opportunities, and practical challenges to implementing and sustaining efforts to address social determinants of health (SDOH).

NASDOH emphasizes three key points:

- **Care planning for individuals with MCC must address key equity issues to better serve individuals at greater risk.** This includes promoting access, comprehensive care planning, continuity of care, and connections between clinical providers and others that can address social needs and determinants. This is particularly important because of a history of inequitable access and treatment and the disproportionate impact of chronic conditions on persons of color (for example, [https://www.amjmed.com/article/S0002-9343\(22\)00330-8/fulltext](https://www.amjmed.com/article/S0002-9343(22)00330-8/fulltext)).
- **Addressing MCC requires attention to social and economic factors that put individuals and communities at risk for chronic conditions and for poor health outcomes.** Many social factors are risk factors for multiple chronic diseases. For example, nutrition security is linked to cardiovascular disease,¹ and poor nutrition is a well established risk factor for obesity, diabetes, cancer, and other conditions.² These underlying risk factors can be addressed by supportive care for individual patient needs but are more fundamentally influenced by conditions in the community.³
- **Healthcare plays critical roles beyond providing clinical care.** Healthcare organizations and institutions can play critical roles as community partners, employer, and advocates for policies that create conditions that prevent chronic disease or halt its progression or impact.

¹ <https://jamanetwork.com/journals/jamacardiology/fullarticle/2796900>

² <https://www.cdc.gov/chronicdisease/resources/publications/factsheets/nutrition.htm>

³ <https://www.cdc.gov/chronicdisease/resources/publications/factsheets/nutrition.htm>



Over the past several years, NASDOH has led an intensive process to crystalize these important roles. Funded by the Robert Wood Johnson Foundation, *Raising the Bar: Healthcare's Transforming Role* is a framework and call to action for the healthcare sector to embrace all the levers, resources, and opportunities available to advance equity and excellence. It includes a set of foundational principles, essential roles for healthcare, and concrete actions for the healthcare sector to pursue the primary goal of improving health and well-being while enabling all people to be treated with dignity and respect. NASDOH and its partners and advisors spent two years gaining input from healthcare providers, payers, patients, and community advocates – with particular attention to those who have lived experience with inequities in healthcare.

Much of the *Raising the Bar* (RtB) framework is directly applicable to the opportunities facing healthcare organizations and institutions in planning for MCC at the patient and community levels. RtB outlines four key roles for healthcare:

- Provide whole person care to achieve health equity, which addresses access and development and execution of co-created plans for integrated care;
- Employ and support a diverse health workforce;
- Engage with individuals and organizations in the community, prioritizing those most affected by inequities; and,
- Advocate for and invest in health equity.

We recommend this broad framework for AHRQ's consideration as a framework that can be adapted for addressing MCC. The full report is available at www.rtbhealthcare.org. The Executive summary is appended to this comment.

In addition to *Raising the Bar*, NASDOH has also devoted more specific focus to the importance of addressing health-related social needs of patients, which is of considerable importance to individuals with MCCs. NASDOH has made specific recommendations for screening for – and addressing – social needs. In recent comments to CMS,⁴ NASDOH recommended development and requirement of a standardized set of common screening elements across all funded programs. NASDOH earlier outlined principles for screening.⁵

NASDOH appreciates the opportunity to provide information on this important topic. For more information on NASDOH and our members, please visit our website at www.nasdoh.org or contact Sara Singleton at Sara.Singleton@leavittpartners.com

Sincerely,

Sara Singleton

Sara Singleton
Principal, Leavitt Partners and Advisor to NASDOH

⁴ https://nasdoh.org/wp-content/uploads/2022/09/CMS-RFI-on-Improving-MA_NASDOH-Comments.pdf

⁵ <https://nasdoh.org/wp-content/uploads/2019/01/NASDOH-Social-Risks-Issue-Brief.pdf>

A Framework for Promoting Equity and Excellence in Healthcare

Supported by the **Robert Wood Johnson Foundation**, *Raising the Bar* provides an actionable framework for the entire healthcare sector to embed equity and excellence throughout its work. In this first part of the project the **National Alliance to impact the Social Determinants of Health** (NASDOH) convened extensive discussions with providers, hospitals, payers, and community leaders to develop foundational principles, essential roles, and concrete actions for the sector to help achieve optimal health for all. A second part, led by the National Partnership for Women & Families, is exploring more detailed guidance for maternal health.

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A Framework for Promoting Equity and Excellence in Healthcare

Raising the Bar: Healthcare's Transforming Role

The United States has many of the assets needed for a healthier nation, including wealth, committed health providers, and technology. The healthcare field includes bright spots where innovative organizations are transforming the payment and delivery of care and strengthening engagement with and service to communities. But broad transformation remains too slow and often focused on narrow fixes to the most visible problems; the healthcare system, as it has evolved, is not delivering on key health goals, frustrates many of its participants, and often fails those most in need. The COVID-19 public health emergency and the national reckoning over equity and racial justice have amplified the importance and opportunity for change and shows the need for a new path for healthcare in recovering from the scope of overwhelming need.

Raising the Bar: Healthcare's Transforming Role is a framework and call to action for the healthcare sector to embrace all the levers, resources, and opportunities available to advance equity and excellence. At the heart of the framework are five foundational principles for a transformed healthcare system. To put these principles into practice, healthcare organizations need to take action across four primary roles, and 14 specific actions are defined. The *Raising the Bar* report highlights organizations already embracing these principles and taking action and incorporates a set of curated resources to support all healthcare stakeholders in pursuing this work.

Five Foundational Principles for Equity and Excellence

The project generated five principles that put the priorities of individuals, families, and communities at the center of healthcare. They were informed by discussion with those who give, get, and pay for care. *Raising the Bar* seeks to accelerate healthcare's efforts to achieve health equity, and to improve the healthcare experience and well-being of individuals, families, and communities.

Raising the Bar: Foundational Principles

The principles are at the heart of *Raising the Bar* and outline commitments for healthcare to comprehensively and holistically raise the bar for equity and excellence. The principles are neither intended to be mutually exclusive nor expressed in any priority order.

- **Mission:** Commit Above All to a Mission of Improving Health and Well-being
- **Equity:** Systematically Pursue Health Equity, Racial Justice, and the Elimination of All Forms of Discrimination
- **Community:** Serve the Community as an Engaged, Responsive, and Proactive Partner
- **Power:** Share and Effectively Use Resources, Influence, and Power
- **Trust:** Earn and Sustain Trusting Relationships

These principles are designed for stakeholders who provide care, including individual clinicians or healthcare professionals, mental and behavioral health providers, provider and physician groups, hospitals, hospital systems, community health centers, integrated systems, those who pay for care—including public and private payers, and those who help facilitate the delivery and payment of physical, mental, behavioral, and social care and services.

Roles and Actions to Put the Principles into Practice

While multiple sectors must work together to address the issues that drive health, *Raising the Bar* focuses on the unique and important roles healthcare possesses across the spectrum: from payment and delivery of care to individuals and their families to promoting the health of employees and communities.

The project defined four essential roles played by healthcare, providing a framework for putting the principles into practice. Within each role, there are concrete actions. In total, there are 14 actions, each with a commitment that healthcare organizations and institutions can make to advance equity and excellence, a statement of the action's importance, and a set of tactical strategies.

PROVIDER ROLE

Provide Whole-Person Care to Achieve Health Equity

Achieving equity and excellence is grounded in the ability of individuals to access and receive the full range of affordable care they need and experience being treated with dignity and respect.

Action 1

Actively promote and facilitate access to care for all in ways that accommodate diverse life circumstances and needs.

Action 2

Establish and sustain a trusting environment where everyone feels they are welcomed and treated with dignity and respect.

Action 3

Provide holistic, effective, high-quality care responsive to plans co-created with individuals, families, and caregivers.

EMPLOYER ROLE

Employ and Support a Diverse Health Workforce

The delivery of care and health outcomes are improved when the workforce and leadership reflect the diversity of the communities served. As employers, healthcare organizations should model practices that allow their workers to thrive.

Action 4

Invest in and grow leaders who advance and embed equity, quality, and value across the organization.

Action 5

Employ and cultivate a representative workforce at all levels.

Action 6

Create and sustain workplaces and jobs where employees can be healthy, thrive, and help guide effective and equitable care while feeling safe.

Action 7

Leverage procurement to ensure the diversity and well-being of contract workers.

PARTNER ROLE

Engage with Individuals and Organizations in the Community, Prioritizing Those Most Affected by Inequities

Communities thrive—and healthcare delivery is more effective—when healthcare meaningfully involves communities; respects and centers their expertise, needs, and priorities in governance and decision-making; and works in partnership with individuals and organizations in the community on activities and initiatives that reflect that engagement.

Action 8

Meaningfully involve individuals from the community in governance and decision-making.

Action 9

Build trusting relationships with individuals and organizations in the community.

Action 10

Respect and build on the expertise and power of individuals and organizations in the community.

ADVOCATE ROLE

Advocate for and Invest in Health Equity

Healthcare's economic resources and influence can be harnessed as positive forces for payment reform, community well-being and resilience, and equity.

Action 11

Actively push for and adopt payment reforms, especially reforms that align investments with the mission of improving health and well-being.

Action 12

Use healthcare's voice to shape public understanding about the importance of health equity and dismantling racism and all forms of discrimination.

Action 13

Use power and influence to advocate for health equity in the development and implementation of public policies.

Action 14

Use investment and procurement power to contribute to the health and resilience of communities.

The Path Forward: What Can You Do to Raise the Bar?

Healthcare can lead the way with a commitment to *Raising the Bar*'s principles, and by taking the concrete actions described in this report.

- **Make a commitment.** We call upon leaders in healthcare—institutions, clinicians, payers—to make a commitment to incorporate the *Raising the Bar* framework in their organizational strategy and practice. For some, this is a starting point in the journey toward the system we need. For the many already seeking or making transformational change, it is an opportunity for further and sustained efforts to raise the bar and accelerate change.
- **Share or adapt our framework for your networks.** We also encourage others to adapt or refine the *Raising the Bar* framework for their own unique circumstances, and to help carry this work forward in their own networks. At rtbhealthcare.org, you can learn more about how many are already responding to this call.
- **Take immediate action while seeking broader changes.** Finally, we emphasize the importance of taking immediate and constructive steps while participating in broader efforts to reform public and private payment systems. Healthcare can both lead the effort to improve the experience of individuals and communities now, while simultaneously advocating for broader systems change that will make this transformation sustainable.
- **[Watch for detailed maternal health guidance.](#)** Part Two of the *Raising the Bar* project focuses on applying the *Raising the Bar* principles and actions to maternal health. This guidance will be available at rtbhealthcare.org in early 2023.



My aspiration for this project is to change healthcare in a fundamental way. I'd like to be able to look back and say we changed the way we think about health—away from a just the process of being cared for to one where in fact, we prevent poor health."

Governor Michael O. Leavitt, *Raising the Bar* Stewardship Council Co-Convener,
Former Governor of Utah and U.S. Secretary of Health and Human Services



**Raising
the Bar**
Healthcare's Transforming Role

2022