



June 24, 2024

Pennsylvania Health Insurance Exchange Authority
P.O. Box 536
Harrisburg, PA 17108

Re: Public Comments on Proposed Rulemaking- 54 Pa. B. 2993 Health Equity Accreditation

To Whom It May Concern:

The National Committee for Quality Assurance (NCQA) appreciates the opportunity to provide feedback on the Pennsylvania Health Insurance Exchange Authority's proposed rulemaking. We strongly support the proposal to require Health Equity Accreditation for insurers looking to sell qualified plans through the Exchange Authority. Requiring Health Equity Accreditation will promote the quality of care- regardless of personal characteristics- among those getting covered on the Exchange.

NCQA is encouraged by this proposed rule and the move Pennsylvania continues to make to address disparities in health care. We look forward to supporting Pennsylvania's Qualified Health Plans to achieve this important accreditation.

NCQA supports the addition of Chapter 5001 to the Exchange Authority's regulations.

By including Chapter 5001 to the Exchange Authority's regulations, Pennsylvania joins 15 other states requiring Health Equity Accreditation. These states have all mandated their Medicaid plans and/or Exchange plans to achieve National Committee for Quality Assurance (NCQA) Health Equity Accreditation. In total, 120 Medicaid, 15 Commercial and 38 Exchange plans across the nation have achieved Health Equity Accreditation.

We recommend NCQA be considered a recognized health equity accreditation organization for HEA accreditation as our HEA program meets the application requirements set forth in the rule. Our [standards](#), policies and procedures provide the written plan that organizations are required to follow to achieve accreditation.

Pennsylvania Exchange Authority requests that the plans and/or curriculums of health equity accreditation organizations address the following items that directly align with NCQA Health Equity Accreditation Standards:

- a. Diversity of the workforce of the applicant seeking accreditation. (Addressed in NCQA Standard Category *HE 1: Organizational Readiness: Ensuring that the organization's internal culture supports the health equity work it performs externally, beginning with the training it provides to staff and its practices for recruitment and hiring.*)
- b. Access and availability of language services. (Addressed in NCQA Standard Category *HE 3: Access and Availability of Language Services: Using data collected in HE 2 to inform the written and oral communications made to individuals, ensuring materials and services are provided in a way that individuals can use and understand.*)
- c. Cultural awareness and responsiveness. (Addressed in NCQA Standard Category *HE 1* (see above) and *HE 4: Practitioner Network Cultural Responsiveness: Maintaining a practitioner network that is capable of serving its diverse membership and is responsive to individuals' cultural and linguistic needs.*)
- d. Reduction of healthcare disparities. (Addressed in NCQA Standard Category *HE 6: Reducing Health Care Disparities: Analyzing clinical performance and patient experience measures to identify inequities by race/ethnicity, preferred language, gender identity and sexual orientation, then identifying and acting on opportunities for improvement.*)

In addition, the requirements outlined by the Exchange Authority for the accreditation organizations include having renewal criteria and specific parameters for applicants to meet prior to becoming accredited. These requirements are paramount to constructing an evidence-based, third-party evaluation program. NCQA's Health Equity Accreditation program lays out specific eligibility criteria in the front matter of our standards publications for organizations seeking accreditation. Additionally, NCQA lays out expectations for renewal surveys that organizations are expected to fully implement and can show that they have continuously performed throughout the previous 2 of their 3 years of Accreditation. This ensures that Accredited organizations are continuously working towards the procedures they put in place as part of achieving their NCQA Health Equity Accreditation.

In the proposed rule, the Exchange authority expects the accreditation organization to educate an applicant "about health equity to help the applicant achieve a framework that advances health

equity, expands coverage and improves health outcomes for the applicant's customers regardless of their race, ethnicity, disability, sexual orientation, gender, socioeconomic status, geography or preferred language.” Currently, NCQA is exploring how to use disability within accreditation standards and encourage Pennsylvania’s inclusion of disability as a disparity sensitive characteristic or identity. NCQA recommends “gender identity” in lieu of “gender” to ensure that individuals who identify outside of the administrative, binary categories of male or female are not excluded from intentional efforts to identify and address health inequities.

NCQA educates organizations seeking accreditation in various ways. Our Education Team provides deep dive courses for the standards of each program. Organizations seeking accreditation also have opportunities to attend modular educational courses that will go into more detail about the equity standards, the process of Accreditation and include important resources such as a detailed gap analysis tool geared towards survey preparedness. In part of NCQA’s mission to improve patient care, we are accredited by the Accreditation Council for Continuing Medical Education (ACCME), the Accreditation Council for Pharmacy Education (ACPE), the American Nurses Credentialing Center (ANCC) to provide Interprofessional Continuing Education for the healthcare team that we are educating.

NCQA Footprint in Pennsylvania

Pennsylvania insurance carriers are familiar with NCQA’s Health Equity Accreditation as Pennsylvania Medicaid requires HEA for their MCOs. (See Appendix A for a full list of plans that have achieved NCQA HEA, HEA+ or its predecessor Multicultural Health Care Distinction, which is being sunset).

Two Pennsylvania plans, Geisinger and UPMC For You, participated in NCQA’s pilot of the HEA program as one of the first organizations to be surveyed on the expanded standards, nationwide. These plans worked closely with NCQA to develop and test the requirements for NCQA’s other health equity program, HEA+, which builds on the standards of NCQA’s HEA by incorporating social drivers of health.

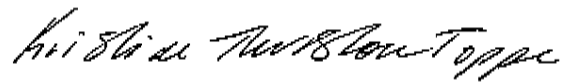
Additionally, Pennsylvania Exchange plans have familiarity with NCQA accreditation processes. All Pennsylvania Exchange plans have selected NCQA Health Plan Accreditation to fulfill the Qualified Health Plan (QHP) Certification Accreditation requirement. (See Appendix B)

NCQA is extremely supportive of Pennsylvania’s continued focus on transforming the state’s delivery system to address disparities throughout the state. Pennsylvania’s plans to drive multi-sector equity changes align with NCQA’s mission.

Thank you for the opportunity to provide feedback. For follow-up questions, please contact Amy Maciejowski at maciejowski@ncqa.org or (202)-735-3688.

We look forward to hearing from you.

Regards,

A handwritten signature in black ink that reads "Kristine Thurston Toppe". The signature is written in a cursive style with a large initial 'K' and 'T'.

Kristine Thurston Toppe
Vice President, State Affairs
National Committee for Quality Assurance

Appendix A. Pennsylvania Health Plans with NCQA Health Equity Accreditation.

NAME	HEALTH PLAN ACCREDITATION STATUS	PLAN TYPE	ADDITIONAL PROGRAMS
Aetna Health Inc, dba Aetna Better Health Kids	Interim	Medicaid HMO	Health Equity Accreditation
Gateway Health Plan, Inc. dba Highmark Wholecare	Accredited - Under Corrective Action	Medicaid HMO	Health Equity Accreditation; Health Equity Accreditation Plus; Electronic Clinical Data
Geisinger Health Plan	Accredited	Medicaid HMO	Health Equity Accreditation; Health Equity Accreditation Plus; Electronic Clinical Data
Health Partners Plans	Accredited	Medicaid HMO	Health Equity Accreditation; Electronic Clinical Data
Independence Hospital Indemnity Plan	Not Accredited	Commercial PPO	Health Equity Accreditation; Electronic Clinical Data
Keystone Health Plan East, Inc.	Accredited	Commercial HMO/POS Combined, Medicare HMO	Health Equity Accreditation; Electronic Clinical Data
Pennsylvania Health & Wellness	Accredited	Medicaid HMO	Health Equity Accreditation: Long Term Services and Supports Distinction
Pennsylvania Health & Wellness	Accredited	Exchange HMO	Health Equity Accreditation
QCC Insurance Company	Accredited	Commercial PPO/EPO Combined	Health Equity Accreditation

QCC Insurance Company	Accredited	Exchange EPO	Health Equity Accreditation
QCC Insurance Company	Accredited	Exchange PPO	Health Equity Accreditation
QCC Insurance Company	Accredited	Medicare PPO	Health Equity Accreditation; Electronic Clinical Data
UnitedHealthcare of Pennsylvania, Inc. (UnitedHealthcare Community Plan (PA))	Accredited	Medicaid HMO	Health Equity Accreditation; Electronic Clinical Data
UPMC For You, Inc.	Accredited	Medicaid HMO	Health Equity Accreditation; Health Equity Accreditation Plus; Long Term Services and Supports Distinction; Electronic Clinical Data
Vista Health Plan DBA AmeriHealth Caritas Pennsylvania	Accredited	Medicaid HMO	Health Equity Accreditation; Electronic Clinical Data
Vista Health Plan DBA Keystone First	Accredited	Medicaid HMO	Health Equity Accreditation; Electronic Clinical Data
Vista Health Plan, Inc. aka AmeriHealth Caritas Health Plan (operating as AmeriHealth Caritas Pennsylvania Community HealthChoices)	Accredited	Medicaid HMO	Multicultural Health Care; Long Term Services and Supports Distinction; Electronic Clinical Data

Vista Heath Plan, Inc., aka Keystone Family Health Plan (operating as Keystone First Community HealthChoices)	Accredited	Medicaid HMO	Multicultural Health Care; Long Term Services and Supports Distinction; Electronic Clinical Data
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Appendix B. Pennsylvania Exchange Plans with NCQA Health Plan Accreditation.

NAME	HEALTH PLAN ACCREDITATION STATUS	PLAN TYPE	ADDITIONAL PROGRAMS
<u>Capital Advantage Assurance Company</u>	Accredited	Exchange PPO	
<u>Cigna Health and Life Insurance Company - Pennsylvania</u>	Accredited	Exchange EPO	
<u>Geisinger Health Plan</u>	Accredited	Exchange HMO/POS Combined	
<u>Geisinger Quality Options</u>	Accredited	Exchange PPO	
<u>Health Partners Plans</u>	Scheduled	Exchange HMO	
<u>Highmark Benefits Group Inc.</u>	Accredited - Under Corrective Action	Exchange PPO	
<u>Highmark Coverage Advantage</u>	Accredited - Under Corrective Action	Exchange EPO	
<u>Highmark Inc.</u>	Accredited - Under Corrective Action	Exchange PPO/EPO Combined	
<u>Highmark Inc.</u>	Accredited	Exchange EPO	
<u>Keystone Health Plan East, Inc.</u>	Accredited	Exchange HMO	
<u>Oscar Health Plan of Pennsylvania, Inc.</u>	Accredited	Exchange HMO	
<u>Pennsylvania Health & Wellness</u>	Accredited	Exchange HMO	Health Equity Accreditation
<u>QCC Insurance Company</u>	Accredited	Exchange EPO	Health Equity Accreditation
<u>QCC Insurance Company</u>	Accredited	Exchange PPO	Health Equity Accreditation

<u>UPMC Health Coverage, Inc.</u>	Accredited	Exchange HMO	
<u>UPMC Health Options, Inc.</u>	Accredited	Exchange EPO	
<u>UPMC Health Options, Inc.</u>	Accredited	Exchange PPO	