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Marilyn Tavenner  
Administrator  
Centers for Medicare & Medicaid Services  
Department of Health and Human Services  
7500 Security Boulevard  
Baltimore, MD 21244-1850

December 19, 2014

Re: Electronic Clinical Quality Measures for Cognitive Impairment Assessment and Health Care Proxy

Dear Administrator Tavenner,

The Alzheimer's Association appreciates the opportunity to comment on the Centers for Medicare & Medicaid Services' (CMS) proposed development of two electronic health record (EHR) measures: Cognitive Impairment Assessment Among Older At-Risk Adults and Determination of a Health Care Proxy for Patients with Cognitive Impairment.

The Alzheimer's Association is the world's leading voluntary health organization in Alzheimer's care, support, and research. Today, there are more than 5 million Americans living with Alzheimer's disease. Alzheimer's is the sixth leading cause of death in the United States, and the only cause of death among the top 10 without a way to prevent, cure, or even slow its progression.<sup>1</sup> Identifying quality-of-care measures is a priority of the *National Plan to Address Alzheimer's Disease*<sup>2</sup> and various efforts are underway. We support the spirit of the measures proposed by CMS and contractor Mathematica Policy Research, as they are the fundamental first steps to living well with dementia: diagnosis and care planning. The Association's specific comments and suggestions follow.

#### **eMeasure: Cognitive Impairment Assessment Among At-Risk Older Adults**

The Alzheimer's Association applauds CMS's effort to improve rates of assessment and diagnosis among older adults. Prioritizing assessment and diagnosis underscores the major diagnosis gap that currently exists: approximately half of the more than 5 million people with the disease may not know they have it.<sup>3</sup> The Association encourages CMS and Mathematica to consider the following changes in their development of the measure.

#### *Age of Patients Assessed*

The Alzheimer's Association strongly encourages CMS and Mathematica to measure the percentage of patients age 65 and older who have been assessed for cognitive impairment, rather than those age 80 and older. One in nine people age 65 and older has Alzheimer's disease.<sup>4</sup> Detection of cognitive impairment at an earlier stage allows providers to establish the individual's and family's treatment preferences, connect them to community resources, and help them to plan for the future. This type of planning can prevent confusion and stress for the patient and family, and allow for the best possible quality of their lives. The Medicare Annual Wellness Visit (AWV) includes a cognitive assessment element available to

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<sup>1</sup> Alzheimer's Association. (2014). *2014 Alzheimer's Disease Facts and Figures*.

<sup>2</sup> *National Plan to Address Alzheimer's Disease: 2014 Update*, available at <http://aspe.hhs.gov/daltcp/napa/NatlPlan2014.pdf>.

<sup>3</sup> Alzheimer's Association. (2014). *2014 Alzheimer's Disease Facts and Figures*.

<sup>4</sup> Ibid.

all Medicare beneficiaries, the majority of whom are under the age of 80. Furthermore, this request for comments cites the benefits of early diagnosis as the rationale for this measure. We believe this measure should capture the assessment of persons age 65 and older.

#### *Definition of Cognitive Impairment*

CMS and Mathematica use the Centers for Disease Control and Prevention definition of "cognitive impairment." This definition, however, omits the concept of decline over time. A change in cognition--degeneration--is a tragic hallmark of the disease and should be included in the definition CMS and Mathematica use as they continue to develop these and other relevant measures.

#### *Measurement Period*

The Association respectfully suggests a measurement period of one year. This period is consistent with the cognitive assessment within the AWW.

#### *Documentation*

In addition to requiring documentation of the *assessment* in the EHR, the Association strongly encourages CMS and Mathematica to require documentation of a *diagnosis* in the EHR, and that a diagnosis, if applicable, be provided to the patient and his or her proxy. In addition to the benefits to patients and caregivers, this measure would also help to advance the Healthy People 2020 objective<sup>5</sup> of increasing the proportion of persons with diagnosed Alzheimer's disease and other dementias, or their caregiver, who are aware of the diagnosis.

#### **eMeasure: Determination of a Health Care Proxy for Patients with Cognitive Impairment**

Identifying a proxy at the earliest possible opportunity allows a person with dementia to express his or her preferences and plan for the future, easing the stress of future decisionmaking. We also agree with the inclusion of the proxy's contact information in the medical record. The Alzheimer's Association supports this measure with the following recommendations.

#### *Measurement Period*

As in the measure of Cognitive Impairment Assessment Among At-Risk Older Adults, the Association respectfully suggests a measurement period of one year. This period is consistent with the cognitive assessment within the AWW.

#### *Assessment Tools and Scores*

The guidance supporting the proposed measures notes several types of tools which can be used in assessing for cognitive impairment, including the Mini-Mental State Examination (MMSE), the General Practitioner Assessment of Cognition, and the Mental Status Assessment of Older Adults. Both the Alzheimer's Association and the National Institute on Aging have identified brief cognitive assessment tools suitable for use during the AWW,<sup>6</sup> but we note for CMS's and Mathematica's consideration that the MMSE has a significant educational bias and several studies suggest an adjusted cutoff in scores based on patient education levels. Thus, the Association recommends that providers administering the MMSE use their professional judgment and the education levels of their patients to determine their own cutoffs when assessing for cognitive impairment.

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<sup>5</sup> *Healthy People 2020*, available at

<http://www.healthypeople.gov/2020/topicsobjectives2020/overview.aspx?topicid=7>.

<sup>6</sup> Cordell, et. al. (2013). Alzheimer's Association recommendations for operationalizing the detection of cognitive impairment during the Medicare Annual Wellness Visit in a primary care setting. *Alzheimer's & Dementia* 1-10.

Thank you for the opportunity to comment. The Alzheimer's Association would welcome a chance to serve as a resource to CMS and Mathematica as they develop these important measures. Please contact Laura Thornhill, Manager of Regulatory Affairs, at 202-638-7042 or lthornhill@alz.org if you have questions or if we can be of additional assistance.

Sincerely,

A handwritten signature in black ink, appearing to read 'R. Egge', with a long horizontal flourish extending to the right.

Robert Egge  
Chief Public Policy Officer