



American Society of Addiction Medicine

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TREAT ADDICTION • SAVE LIVES

September 17, 2013

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Rear Admiral Peter Delaney

Director of SAMHSA's Office of Applied Studies

Substance Abuse and Mental Health Services Administration

1 Choke Cherry Rd

Rockville, MD 20857

Dear Rear Admiral Delaney:

The American Society of Addiction Medicine (ASAM) is pleased to have the opportunity to comment on the draft National Behavioral Health Quality Framework (NBHQF). Although there has been one external review of these proposed measures, given the critical importance of these measures in driving the use of evidence based practice and quality improvement, ASAM's physicians respectfully request that there be additional opportunities for comments, consensus building and beta testing of these measures in the field moving forward. ASAM is convening a workgroup to review these measures and will submit additional comments to SAMHSA in early 2014.

Established in 1954, ASAM has nearly 3,000 members and chapters that cover 42 states. Our members specialize in the treatment of addiction and practice in a wide range of primary care and specialty care settings.

ASAM's physician addiction specialists support the use of key addiction and mental health quality measures as one among several tools for achieving the triple aim in health care – better care, healthy people/healthy communities and affordable care.

ASAM members have been involved as advisors in the development of addiction and mental health process and outcomes measures by the National Quality Forum (NQF), National Committee for Quality Assurance (NCQA) and the Washington Circle Group. ASAM members worked from the development to implementation stages in the use of alcohol use screening and brief intervention and referral to treatment and continue to drive its use in emergency room and primary and specialty care settings. We hope that SAMHSA's development of these behavioral quality measures will provide the same level of consensus building and careful review of the evidence as the NQF, NCQA and Washington Circle processes.

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SAMHSA's future targeted measures involving prevention, wellness and recovery are vitally important and deserve significant input and evaluation of the evidence moving forward. ASAM will provide additional comments on these and other proposed measures as well as experience we have in reducing harm caused in the delivery of care. ASAM strongly supports the inclusion of the draft system level measures which include the percentage of adults with substance use disorders receiving medication managements given the low utilization of addiction treatment medications despite the strong evidence base for their use.

Other draft provider/practitioner measures where ASAM members have a unique contribution to make include, but are not limited to:

NBHQF Goal 1A: Promote the most effective prevention, treatment, and recovery practices for behavioral health disorders.

- Patients reporting abstinence after treatment for addiction

NBHQF Goal 3: COORDINATED –Encourage effective coordination within behavioral health care, and between behavioral health care and community-based primary care providers, and other health care, recovery, and social support services.

- NQF #0646 Reconciled Medication List Received by Discharged Patients (Discharges from an Inpatient Facility to Home/Self Care or Any Other Site of Care)

NBHQF Goal 3A COORDINATED Encourage effective coordination within behavioral health care, and between behavioral health care and community-based primary care providers, and other health care, recovery, and social support services.

- Follow-up referral and adequate connection to care after emergency department visit for substance abuse, mental illness, suicide attempt

NBHQF Goal 4A HEALTHY LIVING –Assist communities to utilize best practices to enable healthy living.

- Screening, brief intervention, and referral for treatment for alcohol misuse
- Screening and intervention/treatment for tobacco use

NBHQF Goal 6A: AFFORDABLE/ACCESSIBLE – Foster affordable high-quality behavioral health care for individuals, families, employers, and governments by developing and advancing new and recovery-oriented delivery models.

- Ability to bill equally for equivalent treatment for behavioral health and other health conditions

ASAM members pledge their commitment to working with HHS and SAMHSA on the development and implementation of these process and outcomes measures to help provide all Americans with access to addiction and mental health care that is safe, effective and affordable.

Sincerely,



Stuart Gitlow, MD, MPH, MBA, FAPA
President, American Society of Addiction Medicine