



**CONSORTIUM FOR CITIZENS
WITH DISABILITIES**

Aug. 17, 2015

National Quality Forum
1030 15th Street NW
Suite 800
Washington DC 20005

The Consortium for Citizens with Disabilities (CCD) Rights Task Force submits this comment in response to NQF's solicitation of feedback on its interim report concerning the need for a framework to measure the gaps in home and community-based services to enhance the quality of community living. CCD is a coalition of national disability organizations working to promote national public policy that ensures the self-determination, independence, empowerment, integration and inclusion of children and adults with disabilities in all aspects of society.

We support NQF's interim report on home and community-based services (HCBS) and believe it captures the important concepts for a measurement framework for these services that is consistent with the Americans with Disabilities Act integration mandate and the *Olmstead* decision. We support, in particular, the report's statements about the importance of ensuring that safety concerns do not deprive people with disabilities of the opportunities to take risks and to make and learn from mistakes just as people without disabilities do, and avoiding an overly medicalized approach to HCBS.

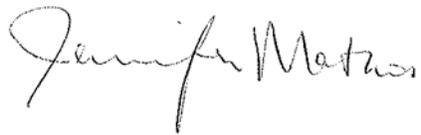
We suggest the following additions to the list of measurement subdomains that the report indicates will be refined over time:

- (1) Under the Domain of "Workforce/Providers," add "goals" to the subdomain of "respect for boundaries, privacy, consumer preferences, and values" (i.e. ". . . consumer preferences, goals, and values").
- (2) Under the Domain of "Human and Legal Rights," add the following to the subdomain of "optimizing the preservation of legal and human rights": "including the right to live, work and receive services in the most integrated setting appropriate."
- (3) Under the Domain of "Effectiveness/Quality of Services" add "individual" in front of the subdomain of "goals and needs realized," to clarify that the referenced goals are the

individual's personal goals rather than the general goals of the service.

Thank you for the opportunity to provide feedback and for your consideration of these comments.

Sincerely,



Jennifer Mathis
Bazelon Center for Mental Health Law



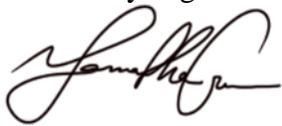
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