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June 27, 2016

Submitted electronically via <http://www.regulations.gov>

Andrew M. Slavitt
Acting Administrator
Centers for Medicare and Medicaid Services (CMS)
Department of Health and Human Services
Attention: CMS-5517-P
P.O. Box 8013
Baltimore, MD 21244-8013

RE: CMS 5517-P: Medicare Program; Merit-Based Incentive Payment System (MIPS) and Alternative Payment Model (APM) Incentive under the Physician Fee Schedule, and Criteria for Physician Focused Payment Models

Dear Acting Administrator Slavitt:

The National Association of Community Health Centers (NACHC) appreciates the opportunity to comment on CMS' proposed rule establishing the Merit-Based Incentive Payment System (MIPS) and Alternative Payment Model (APM) Incentives under the Physician Fee Schedule (PFS) (also referred to as the "Proposed Rule").¹ NACHC is the national membership organization for federally qualified health centers (FQHCs or "health centers"). FQHCs serve as the health home for over 24 million medically-underserved people, the majority of whom live below the Federal Poverty Level and face multiple social and environmental factors which impact their need for health care and their ability to access care appropriately. With over 9,300 sites, FQHCs provide affordable, high quality, comprehensive primary care to these individuals, regardless of their insurance status or ability to pay for services. For additional information on FQHCs, please see Attachment A.

Background on Medicare and FQHCs

Nearly two million health center patients are Medicare beneficiaries. Of these, almost half are dually eligible for both Medicare and Medicaid. On average, roughly nine percent of an FQHC's patients have Medicare; for close to one in five FQHCs, this figure is at least 15 percent.

As noted in the preamble, with a few exceptions, FQHC providers are not paid under the PFS. Rather, payment for their services is made directly to the FQHC under a Prospective Payment System (PPS) established by the Affordable Care Act. This PPS provides an all-inclusive, per-encounter rate that health centers receive each time they provide care to a Medicare patient.

¹ 81 Fed. Reg. 28162 (May 9, 2016).

Because of their unique payment structure, FQHCs and their providers are ineligible for many of CMS' quality payment initiatives, including the Physician Quality Reporting System (PQRS) and Value-Based Payment Modifier Program (VBPM). These programs are designed for providers who are paid under the PFS, and rely heavily on data collected directly from PFS claims, making FQHCs ineligible.

Similarly, FQHCs' unique payment system means that many key elements of the Quality Payment Program (QPP) do not apply to them directly. Nonetheless, the Proposed Rule contains a handful of provisions that will impact FQHCs, and our comments focus on these issues. We begin with a summary of our comments below, and then discuss each in detail.

- **NACHC supports CMS' proposal to permit FQHCs to voluntarily report MIPS data, appropriately adjusted for patients' social determinants of health (SDH), as these efforts will make it more feasible to compare quality and value across FQHCs and PFS providers.**
- **NACHC encourages CMS and HRSA to align the quality measurement sections of MIPS and the Uniform Data System (UDS), such that FQHCs will be able to submit one set of quality data one time for both UDS and MIPS purposes.**
- **NACHC supports giving FQHCs who voluntarily submit data under MIPS, appropriately adjusted for patients' SDH, the option to have this data published on Physician Compare.**
- **NACHC supports permitting FQHCs to voluntarily report on MIPS and be listed on Physician Compare so long as the data collected and reported will be adjusted to reflect patients' Social Determinants of Health (SDH).**
- **NACHC requests that CMS ensure that FQHC providers are not subject to MIPS for the limited number of FQHC-related claims that they submit under the PFS.**

Discussion of NACHC Comments

NACHC supports CMS' proposal to permit FQHCs to voluntarily report MIPS data, appropriately adjusted for patients' social determinants of health (SDH), as these efforts will make it more feasible to compare quality and value across FQHCs and PFS providers.

One of the primary goals of the QPP is to transition providers toward enhanced value-based care delivery and enable the quality and value of care to be compared across providers. NACHC strongly supports this goal, and welcomes the opportunity for FQHCs to be included in such comparisons provided that they are based on consistent data and appropriate risk adjustment is conducted.

As previously noted, FQHCs' unique payment system makes them ineligible to participate in CMS' current systems for measuring quality or value (PQRS and VBPM) or in MIPS. Instead, FQHCs report data on quality and value to the Health Resources and Services Administration (HRSA), through the UDS.² Unfortunately, the data submitted by FQHCs to HRSA is not directly comparable to the data submitted by PFS providers to CMS, as there are some significant differences in which measures are collected and how they are calculated. In addition, the data resides

² The UDS, which has been in existence for over two decades, collects detailed information on an extensive range of measures, including but not limited to costs, clinical outcomes, services, visits, and patient mix. UDS data is publicly available at the national, state, and individual health center level at <http://bphc.hrsa.gov/datareporting/>

in separate systems that do not communicate with each other. As a result, it is not currently possible to directly compare FQHCs' and PFS providers' data on quality and value.

NACHC recognizes that it will require significant effort to completely align the data and systems used by FQHCs and PFS providers in a manner that enables fair comparisons about quality and value. We believe permitting FQHCs to voluntarily report under MIPS is a helpful step towards this alignment, as it will enable FQHCs to gain experience using the MIPS measures and systems, and to identify specific areas where support and/or alignment is needed. For these reasons, NACHC supports the proposal to permit FQHCs to voluntarily report under MIPS.

NACHC encourages CMS and HRSA to align the quality measurement sections of MIPS and UDS, such that FQHCs will be able to submit one set of quality data one time for both UDS and MIPS purposes.

As previously stated, NACHC supports efforts to align reporting requirements in a manner that enables fair comparisons about quality and value to be made between FQHCs and PFS providers. We are optimistic that this can be done in a way that meets both CMS' and HRSA's needs, without increasing the reporting burden on FQHCs. Specifically, NACHC encourages CMS and HRSA to develop a system in which:

- The quality measures that FQHCs must report to HRSA meet MIPS requirements;
- FQHCs submit this data to HRSA as part of their UDS submission; and
- HRSA forwards this data to CMS on behalf of all FQHCs, eliminating the need for FQHCs to report the same data to both agencies.
- NACHC recognizes that HRSA staff is already moving to align UDS quality measures with CMS measures, and we appreciate these efforts. We look forward to a future system in which FQHCs can submit one set of quality data one time for both UDS and MIPS purposes.

NACHC supports giving FQHCs who voluntarily submit data under MIPS, appropriately adjusted for patients' SDH, the option to have this data published on Physician Compare.

Similar to our support for permitting FQHCs to voluntarily report MIPS data, NACHC supports permitting FQHCs to have their data shared on Physician Compare. However, as with MIPS reporting, we feel strongly that this should be an option for FQHCs, and that it should be separate from the decision on whether to report under MIPS. We anticipate that in the initial MIPS years, FQHCs will encounter technical and data-related challenges in reporting this data. In addition, as discussed further below, there are concerns as to whether the data will be appropriately adjusted to reflect their patients' SDH.

As a result, FQHCs' MIPS data may be an inaccurate reflection of their performance, and therefore inappropriate for publication. Knowing that any data FQHCs attempted to report on MIPS would automatically be published on Physician Compare would be a significant disincentive for FQHCs to voluntarily report under MIPS. Therefore, NACHC supports giving FQHCs who voluntarily submit data under MIPS the option to have this data published on Physician Compare.

NACHC supports permitting FQHCs to voluntarily report on MIPS and be listed on Physician Compare so long as the data collected and reported will be adjusted to reflect patients' SDH.

As is indicated in the Proposed Rule, Section 2(d) of the IMPACT Act instructed the Secretary to prepare two studies that “examines the effect of individuals’ socioeconomic status on quality measures and resource use and other measures for individuals under the Medicare program”. Congress specifically referenced that the SDH to be examined should include, but not be limited to: race, health literacy, limited English proficiency (LEP), Medicare beneficiary activation, socioeconomic and demographic characteristics, ethnicity, and health status. Congress also stated that one of the studies’ purposes was “to recognize that less healthy individuals may require more intensive interventions.” Congress concluded by stating the reports should recommend how CMS should adjust data and payments to reflect relationships between SDH and measures including (but not limited to) quality and resource use.

NACHC appreciates that in three separate locations in the Proposed Rule, CMS references the first of these studies, which the Assistant Secretary of Planning and Evaluation (ASPE) is expected to issue this fall. We particularly appreciate the repeated assurances that:

“The U.S. Department of Health and Human Services’ (HHS) Office of the Assistant Secretary for Planning and Evaluation (ASPE) is conducting studies and making recommendations on the issue of risk adjustment for socioeconomic status on quality measures and resource use as required by section 2(d) of the Improving Medicare Post-Acute Care Transformation Act of 2014 (the IMPACT Act) and expects to issue a report to Congress by October 2016. We will closely examine the recommendations issued by ASPE and incorporate them, as feasible and appropriate through future rulemaking.”³

NACHC wishes to emphasize the critical importance of appropriate risk adjustment to reflect the SDH affecting providers’ patient populations. As referenced earlier, by both law and mission, FQHCs serve underserved, high-need populations. Almost three-quarters of our patients live below the poverty level. They are also disproportionately affected by social and environmental challenges that make it difficult for them to access and utilize health care appropriately (e.g., limited English proficiency, lack of stable housing, low literacy rates, lack of transportation). As decades of research has proven – and Congress has explicitly recognized -- these patients have greater needs, which can cause providers who care for them to score lower on measures of quality and resource use.

For these reasons, NACHC’s support for FQHCs voluntarily reporting on MIPS and being listed on Physician Compare, as discussed above, is conditioned on the expectation that the data collected will be adjusted to reflect SDH. Without such risk adjustment, it is inevitable that the value and quality of care that FQHCs provide will be understated relative to other providers. If this occurs, the benefits of having a consistent system to measure performance and publicizing this data would be more than outweighed by the fact that the playing field would be uneven for providers, such as FQHCs, who serve the most challenging patients – a clear disadvantage to these providers.

Finally, NACHC would like to offer to be of assistance as ASPE and CMS work to determine how best to adjust measures and payments to reflect SDH. NACHC is currently engaged in an extensive study to create, test, and promote a national standardized patient risk assessment protocol to assess and address patients’ SDH. For more information on this project, called the Protocol for Responding to and Assessing Patient Assets, Risks, and Experiences (PRAPARE), please see Attachment B.

³ *Id.* at 28164.

NACHC requests that CMS ensure that FQHC providers are not subject to MIPS for the small number of FQHC-related claims that they submit under the PFS.

In the Proposed Rule, Section D.1.d of the preamble states the following:

“...if a MIPS eligible clinician furnishes other items and services in an RHC and/or FQHC and bills for those items and services under the PFS, the MIPS adjustment would apply to payments made for items and services. Accordingly, the MIPS eligible clinician would need to meet the applicable MIPS reporting requirements to avoid a downward MIPS adjustment to payments made for items and services billed by the MIPS eligible clinician under the PFS.”⁴

NACHC believes that this statement was meant to address situations in which an FQHC provider bills extensively under the PFS, presumably because he or she also works part-time at a different facility (that bills under the PFS), or because he or she generally provides services that are not covered under the FQHC benefit (such as specialty services). NACHC supports the applicability of MIPS in these situations.

However, we are concerned that FQHC providers who do not meet either of these criteria (i.e., they work exclusively at the FQHC providing primary care services) could be required to participate in MIPS. While the vast majority of covered FQHC services are reimbursed under PPS, there are a few covered services – such as the technical components of certain lab tests and x-rays – that FQHCs are required to bill under the PFS, using the name of the individual provider. Thus, even “typical” FQHC providers – meaning those who work exclusively at FQHCs providing Medicare-covered primary care services to FQHC patients – submit some PFS bills to Medicare.

The preamble states that CMS is considering a low-volume exception to MIPS for providers that bill under the PFS for less than \$10,000 and 100 patients over the course of a year. NACHC supports the establishment of a low-volume threshold, and notes that most “typical” FQHC providers will fall below this 100 patient/ \$10,000 limit. However, some typical FQHCs providers – particularly those working at centers with a high percentage of Medicare patients – are likely to exceed the 100 patient threshold. For example, if a provider ordered certain lab tests on 2 Medicare patients each week, they would generate over 100 claims a year for the technical component of these tests. Since the Proposed Rule requires providers to fall below both the 100 patients and \$10,000 level to meet the low-volume threshold, these providers would be required to participate in MIPS.

To alleviate this concern, NACHC recommends that the threshold be revised to an either/ or standard (i.e., providers are exempted if they have less than 100 patients or less than \$10,000 in fee schedule claims). Alternatively, CMS could state that fee-for-service claims for non-specialty services provided by FQHC providers to FQHC patients are not counted when determining eligibility for the low-volume threshold.

In closing, NACHC appreciates the extensive work that CMS staff have done to draft this proposed rule under a very tight timeframe. We appreciate the opportunity to submit comments, and both our staff and our member health centers would be happy to provide any further information that would be helpful.

⁴ *Id.* at 28176.

Sincerely,

A handwritten signature in cursive script that reads "Colleen P. Meiman". The signature is fluid and includes a long horizontal flourish at the end.

Colleen P. Meiman, MPPA
Director, Regulatory Affairs
National Association of Community Health Centers
202.296.0158
cmeiman@nachc.org

Attachment A:

OVERVIEW OF FEDERALLY QUALIFIED HEALTH CENTERS

For 50 years, Health Centers have provided access to quality and affordable primary and preventive healthcare services to millions of uninsured and medically underserved people nationwide, regardless of their ability to pay. At present there are almost 1,300 health centers with more than 9,300 sites. Together, they serve **over 24 million patients**, including nearly seven million children and more than 1 in 6 Medicaid beneficiaries.

Health centers provide care to all individuals, regardless of their ability to pay. All health centers provide a full range of primary and preventive services, as well as services that enable patients to access health care appropriately (e.g., translation, health education, transportation). A growing number of Health Centers also provide dental, behavioral health, pharmacy, and other important supplemental services.

To be approved by the Federal government as a Health Center, an organization must meet requirements outlined in § 330 of the Public Health Service Act. These requirements include, but are not limited to:

- **Serve a federally-designated medically underserved area or a medically underserved population.** Some Health Centers serve an entire community, while other target specific populations, such as persons experiencing homelessness or migrant farmworkers.
- Offer services to all persons, regardless of the person's ability to pay.
- Charge no more than a nominal fee to patients whose incomes are at or below the Federal Poverty Level (FPL).
- Charge persons whose incomes are between 101% and 200% FPL based on a sliding fee scale.
- Be **governed by a board of directors, of whom a majority of members must be patients of the health center.**

Most §330 Health Centers receive Federal grants from the Bureau of Primary Health Care (BPHC) within HRSA. BPHC's grants are intended to provide funds to assist health centers in covering the otherwise uncompensated costs of providing care to uninsured and underinsured indigent patients, as well as to maintain the health center's infrastructure. Patients who are not indigent or who have insurance, whether public or private, are expected to pay for the services rendered. In 2014, on average, the insurance status of Health Center patients is as follows:

- 47% are Medicaid recipients
- 28% are uninsured
- 16% are privately insured
- 9% are Medicare recipients

No two health centers are identical, but they all share one common purpose: to provide primary health care services that are coordinated, culturally and linguistically competent, and community-directed, to uninsured and medically underserved people.

Appendix B:

**PRAPARE: Protocol for Responding to and Assessing Patient Assets, Risks, and Experiences
Paper Version of PRAPARE for Implementation as of June 13, 2016**

<p>Personal Characteristics</p> <p>1. Are you Hispanic or Latino?</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 25%;"><input type="checkbox"/> Yes</td> <td style="width: 25%;"><input type="checkbox"/> No</td> <td style="width: 50%;"><input type="checkbox"/> I choose not to answer this question</td> </tr> </table> <p>2. Which race(s) are you? Check all that apply.</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%;"><input type="checkbox"/> Asian</td> <td style="width: 50%;"><input type="checkbox"/> Native Hawaiian</td> </tr> <tr> <td><input type="checkbox"/> Pacific Islander</td> <td><input type="checkbox"/> Black/African American</td> </tr> <tr> <td><input type="checkbox"/> White</td> <td><input type="checkbox"/> Other (please write)</td> </tr> <tr> <td colspan="2"><input type="checkbox"/> I choose not to answer this question</td> </tr> </table> <p>3. At any point in the past 2 years, has season or migrant farm work been your or your family's main source of income?</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 25%;"><input type="checkbox"/> Yes</td> <td style="width: 25%;"><input type="checkbox"/> No</td> <td style="width: 50%;"><input type="checkbox"/> I choose not to answer this question</td> </tr> </table> <p>4. Have you been discharged from the armed forces of the United States?</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 25%;"><input type="checkbox"/> Yes</td> <td style="width: 25%;"><input type="checkbox"/> No</td> <td style="width: 50%;"><input type="checkbox"/> I choose not to answer this question</td> </tr> </table> <p>5. What language are you most comfortable speaking?</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 100%;"><input type="checkbox"/> English</td> </tr> <tr> <td><input type="checkbox"/> Language other than English (please write)</td> </tr> <tr> <td><input type="checkbox"/> I choose not to answer this question</td> </tr> </table> <p>Family & Home</p> <p>6. How many family members, including yourself, do you currently live with? _____</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 100%;"><input type="checkbox"/> I choose not to answer this question</td> </tr> </table>	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> I choose not to answer this question	<input type="checkbox"/> Asian	<input type="checkbox"/> Native Hawaiian	<input type="checkbox"/> Pacific Islander	<input type="checkbox"/> Black/African American	<input type="checkbox"/> White	<input type="checkbox"/> Other (please write)	<input type="checkbox"/> I choose not to answer this question		<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> I choose not to answer this question	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> I choose not to answer this question	<input type="checkbox"/> English	<input type="checkbox"/> Language other than English (please write)	<input type="checkbox"/> I choose not to answer this question	<input type="checkbox"/> I choose not to answer this question	<p>7. What is your housing situation today?</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 100%;"><input type="checkbox"/> I have housing</td> </tr> <tr> <td><input type="checkbox"/> I do not have housing (staying with others, in a hotel, in a shelter, living outside on the street, on a beach, in a car, or in a park)</td> </tr> <tr> <td><input type="checkbox"/> I choose not to answer this question</td> </tr> </table> <p>8. Are you worried about losing your housing?</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 25%;"><input type="checkbox"/> Yes</td> <td style="width: 25%;"><input type="checkbox"/> No</td> <td style="width: 50%;"><input type="checkbox"/> I choose not to answer this question</td> </tr> </table> <p>9. What address do you live at?</p> <p>Street: _____</p> <p>City, State, Zipcode: _____</p> <p>Money & Resources</p> <p>10. What is the highest level of school that you have finished?</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%;"><input type="checkbox"/> Less than high school degree</td> <td style="width: 50%;"><input type="checkbox"/> High school diploma or GED</td> </tr> <tr> <td><input type="checkbox"/> More than high school</td> <td><input type="checkbox"/> I choose not to answer this question</td> </tr> </table> <p>11. What is your current work situation?</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 33%;"><input type="checkbox"/> Unemployed</td> <td style="width: 33%;"><input type="checkbox"/> Part-time or temporary work</td> <td style="width: 33%;"><input type="checkbox"/> Full-time work</td> </tr> <tr> <td colspan="3"><input type="checkbox"/> Otherwise unemployed but not seeking work (ex: student, retired, disabled, unpaid primary care giver) Please write:</td> </tr> <tr> <td colspan="3"><input type="checkbox"/> I choose not to answer this question</td> </tr> </table> <p>12. What is your main insurance?</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%;"><input type="checkbox"/> None/uninsured</td> <td style="width: 50%;"><input type="checkbox"/> Medicaid</td> </tr> <tr> <td><input type="checkbox"/> CHIP Medicaid</td> <td><input type="checkbox"/> Medicare</td> </tr> <tr> <td><input type="checkbox"/> Other public insurance (not CHIP)</td> <td><input type="checkbox"/> Other Public Insurance (CHIP)</td> </tr> <tr> <td><input type="checkbox"/> Private Insurance</td> <td></td> </tr> </table>	<input type="checkbox"/> I have housing	<input type="checkbox"/> I do not have housing (staying with others, in a hotel, in a shelter, living outside on the street, on a beach, in a car, or in a park)	<input type="checkbox"/> I choose not to answer this question	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> I choose not to answer this question	<input type="checkbox"/> Less than high school degree	<input type="checkbox"/> High school diploma or GED	<input type="checkbox"/> More than high school	<input type="checkbox"/> I choose not to answer this question	<input type="checkbox"/> Unemployed	<input type="checkbox"/> Part-time or temporary work	<input type="checkbox"/> Full-time work	<input type="checkbox"/> Otherwise unemployed but not seeking work (ex: student, retired, disabled, unpaid primary care giver) Please write:			<input type="checkbox"/> I choose not to answer this question			<input type="checkbox"/> None/uninsured	<input type="checkbox"/> Medicaid	<input type="checkbox"/> CHIP Medicaid	<input type="checkbox"/> Medicare	<input type="checkbox"/> Other public insurance (not CHIP)	<input type="checkbox"/> Other Public Insurance (CHIP)	<input type="checkbox"/> Private Insurance	
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<input type="checkbox"/> Private Insurance																																																	

13. During the past year, what was the total combined income for you and the family members you live with? This information will help us determine if you are eligible for any benefits.

<input type="checkbox"/>	I choose not to answer this question
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14. In the past year, have you or any family members you live with been **unable** to get any of the following when it was **really needed**? Check all that apply.

Yes	No	Food	Yes	No	Clothing
Yes	No	Utilities	Yes	No	Child Care
Yes	No	Medicine or Any Health Care (Medical, Dental, Mental Health, Vision)			
Yes	No	Phone	Yes	No	Other (please write):
<input type="checkbox"/>	I choose not to answer this question				

15. Has lack of transportation kept you from medical appointments, meetings, work, or from getting things needed for daily living? Check all that apply.

<input type="checkbox"/>	Yes, it has kept me from medical appointments or from getting my medications
<input type="checkbox"/>	Yes, it has kept me from non-medical meetings, appointments, work, or from getting things that I need
<input type="checkbox"/>	No
<input type="checkbox"/>	I choose not to answer this question

Social and Emotional Health

16. How often do you see or talk to people that that you care about and feel close to? (For example: talking to friends on the phone, visiting friends or family, going to church or club meetings)

<input type="checkbox"/>	Less than once a week	<input type="checkbox"/>	1 or 2 times a week
<input type="checkbox"/>	3 to 5 times a week	<input type="checkbox"/>	5 or more times a week
<input type="checkbox"/>	I choose not to answer this question		

17. Stress is when someone feels tense, nervous, anxious, or can't sleep at night because their mind is troubled. How stressed are you?

<input type="checkbox"/>	Not at all	<input type="checkbox"/>	A little bit
<input type="checkbox"/>	Somewhat	<input type="checkbox"/>	Quite a bit
<input type="checkbox"/>	Very much	<input type="checkbox"/>	I choose not to answer this question

Optional Additional Questions

18. In the past year, have you spent more than 2 nights in a row in a jail, prison, detention center, or juvenile correctional facility?

<input type="checkbox"/>	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	I choose not to answer this question
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19. Are you a refugee?

<input type="checkbox"/>	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	I choose not to answer this question
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20. What country are you from?

<input type="checkbox"/>	United States	<input type="checkbox"/>	Country other than the United States (please write):
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21. Do you feel physically and emotionally safe where you currently live?

<input type="checkbox"/>	Yes	<input type="checkbox"/>	Unsure
<input type="checkbox"/>	No	<input type="checkbox"/>	I choose not to answer this question

22. In the past year, have you been afraid of your partner or ex-partner?

<input type="checkbox"/>	Yes	<input type="checkbox"/>	Unsure
<input type="checkbox"/>	No	<input type="checkbox"/>	I have not had a partner in the past year
<input type="checkbox"/>	I choose not to answer this question		



For more information about this tool, please contact Michelle Jester at mjester@nachc.org or visit the “Social Determinants of Health Resources” folder at <http://www.healthcarecommunities.org/ResourceCenter.aspx>

	Unemployed	Part-time or temporary work	Full-time work
	Otherwise unemployed but not seeking work (ex: student, retired, disabled, unpaid primary care giver) Please write:		
	I choose not to answer this question		

13. During the past year, what was the total combined income for you and the family members you live with? This information will help us determine if you are eligible for any benefits.

I choose not to answer this question

14. In the past year, have you or any family members you live with been **unable** to get any of the following when it was **really needed**? Check all that apply.

Yes	No	Food	Yes	No	Clothing
Yes	No	Utilities	Yes	No	Child Care
Yes	No	Medicine or Any Health Care (Medical, Dental, Mental Health, Vision)			
Yes	No	Phone	Yes	No	Other (please write):
I choose not to answer this question					

15. Has lack of transportation kept you from medical appointments, meetings, work, or from getting things needed for daily living? Check all that apply.

<input type="checkbox"/>	Yes, it has kept me from medical appointments or from getting my medications
<input type="checkbox"/>	Yes, it has kept me from non-medical meetings, appointments, work, or from getting things that I need
<input type="checkbox"/>	No
<input type="checkbox"/>	I choose not to answer this question

Social and Emotional Health

16. How often do you see or talk to people that that you care about and feel close to? (For example: talking to friends on the phone, visiting friends or family, going to church or club meetings)

<input type="checkbox"/>	Less than once a week	<input type="checkbox"/>	1 or 2 times a week
<input type="checkbox"/>	3 to 5 times a week	<input type="checkbox"/>	5 or more times a week
<input type="checkbox"/>	I choose not to answer this question		

17. Stress is when someone feels tense, nervous, anxious, or can't sleep at night because their mind is troubled. How stressed are you?

<input type="checkbox"/>	Not at all	<input type="checkbox"/>	A little bit
<input type="checkbox"/>	Somewhat	<input type="checkbox"/>	Quite a bit
<input type="checkbox"/>	Very much	<input type="checkbox"/>	I choose not to answer this question

Optional Additional Questions

18. In the past year, have you spent more than 2 nights in a row in a jail, prison, detention center, or juvenile correctional facility?

<input type="checkbox"/>	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	I choose not to answer this question
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19. Are you a refugee?

<input type="checkbox"/>	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	I choose not to answer this question
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20. What country are you from?

<input type="checkbox"/>	United States	<input type="checkbox"/>	Country other than the United States (please write):
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21. Do you feel physically and emotionally safe where you currently live?

<input type="checkbox"/>	Yes	<input type="checkbox"/>	Unsure
<input type="checkbox"/>	No	<input type="checkbox"/>	I choose not to answer this question

22. In the past year, have you been afraid of your partner or ex-partner?

<input type="checkbox"/>	Yes	<input type="checkbox"/>	Unsure
<input type="checkbox"/>	No	<input type="checkbox"/>	I have not had a partner in the past year
<input type="checkbox"/>	I choose not to answer this question		

