

90.2.1 - Additional Considerations

(Rev. 129; Issued: 08-11-23; Effective: 01-01-24; Implementation: 01-01-24)

¹⁰ VSAC is a repository for clinical coding vocabularies that define clinical concepts to support interoperable health information exchange, and is provided by the National Library of Medicine in collaboration with the Office of the National Coordinator for Health Information Technology and CMS.

Equity & Accessibility

CMS encourages SNPs to consider equity issues in selecting screening instruments and questions, including the questions required by 42 CFR 422.101(f)(1)(i). In particular, SNPs should consider whether the instrument has been validated for racial and ethnic minority populations that the SNP serves and whether the instrument can be translated into languages that are commonly spoken by the SNP's enrollees. In addition, SNPs should consider whether they can provide the questions in accessible formats using auxiliary aids and services as required by section 1557 of the Affordable Care Act and implementing regulations at 45 CFR Part 92. These regulations require plans to provide appropriate auxiliary aids and services, including interpreters and information in alternate formats, to individuals with impaired sensory, manual, or speaking skills where necessary to afford such persons an equal opportunity to benefit from the service.

Questions from Multiple Assessment Instruments

SNPs are not required to adopt any of these screening instruments wholesale. SNPs must adopt one or more questions related to each of the required three domains specified in 42 CFR 422.101(f)(1)(i) in their HRAs. SNPs do not need to select questions on the three required domains from just one assessment instrument. For example, a SNP may choose one question from a particular screening instrument on food security, and a question on housing stability from another screening instrument. This also applies to state-required assessment instruments. For example, if a SNP uses a state-required assessment that includes questions about housing stability and food security, but does not include any questions about access to transportation, the SNP must still include a question on access to transportation in its HRA and therefore must select one or more questions on access to transportation from an assessment instrument specified by CMS in this guidance.

Assessment Instruments with Multiple Questions on the Same Domain

There may be instances where an instrument includes multiple questions in the required domains. For example, an assessment instrument may include a question about housing instability as well as a question about quality of housing—both of which pertain to the required housing stability domain. If an instrument includes more than one question for a domain and a SNP elects to screen for that domain using that instrument, CMS strongly encourages the SNP adopt all of the questions for that domain in their health risk assessment. Validated assessment instruments with multiple questions on the same domain have been validated as a panel of questions and may be less accurate at screening an enrollee for a particular need when only one question from that panel is used. However, a SNP can comply with 42 CFR 422.101(f)(1)(i) even if the plan does not use the full suite of questions on a domain from a particular screening instrument.