

DATE 09/30/24

Adult and Child Core Set Annual Review Workgroup  
c/o Mathematica  
1100 First Street, NE, 12th Floor  
Washington, DC 20002-4221

Dear Workgroup Members:

The American Lung Association appreciates the opportunity to provide comments on the Recommendations for Improving the Core Sets of Health Care Quality Measures for Medicaid and CHIP: Summary of a Workgroup Review of the 2028 Child and Adult Core Sets *Draft Report*.

The American Lung Association is the oldest voluntary public health association in the United States, representing the more than 35 million individuals living with lung disease. The Lung Association is the leading organization working to save lives by improving lung health and preventing lung disease through research, education and advocacy.

The Lung Association is pleased by the Mathematica workgroup's decision to recommend the addition of two new measures: Follow-Up After Acute and Urgent Care Visits for Asthma and Tobacco Use Screening and Cessation Intervention. Quality measures are important for tracking gaps in screening and treatment, evaluating treatment effectiveness and improving health outcomes.

The Lung Association supports the addition of "Follow-Up After Acute Care Visits for Asthma" to the 2028 Child and Adult Core Sets. Asthma affects 27.8 million people in the United States, including 4.8 million children,<sup>1</sup> and poorly managed asthma leads to nearly one and a half million emergency department visits each year.<sup>2</sup> This measure will encourage a stronger role for primary care in asthma management and provide a greater incentive for health plans to ensure that patients are receiving follow-up care from a medical home. The emergence of Single Maintenance and Reliever Therapy (SMART) has posed challenges to calculating the Asthma Medication Ratio (AMR). We are disappointed that the retirement of the AMR in the 2027 Core Set means that there will be a gap in tracking asthma management. Therefore we appreciate that this new measure has been recommended for the 2028 Child and Adult Core Sets.

The Lung Association further supports the addition of "Tobacco Use Screening and Cessation Intervention (TSC-E)" to the 2028 Child and Adult Core Sets. Tobacco use is the leading cause of preventable death and disease in the United States. Data show that most people who smoke want to quit (67.7%), but only a fraction actually quit (8.8%).<sup>3</sup> Including TSC-E in the Core Set will encourage plans and providers to ask about tobacco use and provide cessation treatment to individuals who use tobacco. We are disappointed that the retirement of "Medical Assistance with Smoking and Tobacco Use Cessation" in the 2027

Adult Core Set means that there will not be data on tobacco use and cessation collected from health plans in 2027. We appreciate that this new measure has been recommended for implementation in 2028.

Both of these measures are especially important for Medicaid programs. Asthma rates are consistently higher among those enrolled in Medicaid at 12.4% than those in private insurance, at 7.2%,<sup>4</sup> and 48% of all Medicaid enrollees are children.<sup>5</sup> Medicaid enrollees also smoke at a very high rate – while the overall smoking rate is 11.5%, nationally Medicaid enrollees smoke at rate of 21.5%.<sup>6</sup> Smoking related illness accounts for approximately \$39 billion annually in the Medicaid program.<sup>7</sup> Implementing these measures across Medicaid programs will save lives and money.

Thank you for the opportunity to provide comments.

Sincerely,



Harold Wimmer  
President and CEO

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<sup>1</sup> Centers for Disease Control and Prevention. National Center for Health Statistics. National Interview Survey, 2023. Analysis by the American Lung Association Epidemiology and Statistics Unit using SPSS software.

<sup>2</sup> Centers for Disease Control and Prevention. National Center for Health Statistics. National Hospital Ambulatory Medical Care Survey: 2022 Emergency Department Summary Tables. Available at: [https://www.cdc.gov/nchs/data/nhamcs/web\\_tables/2022-nhamcs-ed-web-tables.pdf](https://www.cdc.gov/nchs/data/nhamcs/web_tables/2022-nhamcs-ed-web-tables.pdf)

<sup>3</sup> VanFrank B, Malarcher A, Cornelius ME, Schechter A, Jamal A, Tynan M. Adult Smoking Cessation — United States, 2022. MMWR Morb Mortal Wkly Rep 2024;73:633–641. DOI: <http://dx.doi.org/10.15585/mmwr.mm7329a1>

<sup>4</sup> American Lung Association. Asthma trends and burden. Accessed May 26, 2023. <https://www.lung.org/research/trends-in-lung-disease/asthma-trends-brief/trends-and-burden>

<sup>5</sup> Medicaid Enrollment and Unwinding Tracker. KFF. April 24, 2026. Available at: <https://www.kff.org/medicaid/medicaid-enrollment-and-unwinding-tracker/>

<sup>6</sup> Cornelius ME, Loretan CG, Jamal A, et al. Tobacco Product Use Among Adults – United States, 2021. MMWR Morb Mortal Wkly Rep 2023;72:475–483. DOI: <http://dx.doi.org/10.15585/mmwr.mm7218a1>

<sup>7</sup> U.S. Department of Health and Human Services. Smoking Cessation. A Report of the Surgeon General. Atlanta, GA: U.S. Department of Health and Human Services, Centers for Disease Control and Prevention, National Center for Chronic Disease Prevention and Health Promotion, Office on Smoking and Health, 2020.