



CHP+

Child Health Plan *Plus*

Colorado Children's Health Insurance Program

Fiscal Year 2024–2025 PIP Validation Report *for* Rocky Mountain Health Plan

April 2025

*This report was produced by Health Services Advisory Group, Inc. for the
Colorado Department of Health Care Policy & Financing.*



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1. Executive Summary

Pursuant to 42 CFR §457.1250, which requires states’ Children’s Health Insurance Program (CHIP) managed care programs to participate in external quality review (EQR), the State of Colorado, Department of Health Care Policy and Financing (the Department) required its Child Health Plan *Plus* (CHP+) managed care organizations (MCOs) to conduct and submit performance improvement projects (PIPs) annually for validation by the State’s external quality review organization (EQRO). Rocky Mountain Health Plan, an MCO referred to in this report as RMHP, holds a contract with the Department for provision of medical and behavioral health (BH) services for the Department’s CHP+ managed care program.

The purpose of a PIP is to achieve, through ongoing measurements and interventions, significant improvement sustained over time in performance indicator outcomes that focus on clinical or nonclinical areas. For this year’s 2024–2025 validation, RMHP submitted two PIPs: *Well-Child Visit [WCV] Rates for RMHP CHP+ Members* and *Improving the Rate of SDOH [Social Determinants of Health] Screening for CHP+ Members*. These topics addressed Centers for Medicare & Medicaid Services’ (CMS’) requirements related to quality outcomes—specifically, the quality, timeliness, and accessibility of care and services.

The clinical *WCV Rates for RMHP CHP+ Members* PIP addresses quality, timeliness, and accessibility of healthcare and services for child and adolescent members. The topic, selected by RMHP and approved by the Department, was supported by historical data. The targeted population includes RMHP CHP+ members ages 3 to 21 years. The PIP Aim statement is as follows: “Does leveraging member rewards programs and primary care provider value-based contract requirements increase well-child visit rates for the RMHP CHP population?”

The nonclinical *Improving the Rate of SDOH Screening for CHP+ Members* PIP addresses quality and accessibility of healthcare and services for RMHP CHP+ members by increasing awareness of social factors that may impact member access to needed care and services. The nonclinical topic was mandated by the Department. The PIP Aim statement is as follows: “Does opening access to utilization of different SDOH tools and data feeds, and implementing intervention activities with multiple tools in a variety of clinical settings, improve overall SDOH screening rates?”

Table 1-1 outlines the performance indicators for each PIP.

Table 1-1—Performance Indicators

PIP Title	Performance Indicator
<i>WCV Rates for RMHP CHP+ Members</i>	The percentage of eligible CHP+ members ages 3 to 21 years who completed one or more well-care visits during the measurement year.
<i>Improving the Rate of SDOH Screening for CHP+ Members</i>	The percentage of eligible CHP+ members who had at least one billed encounter in the measurement year and who completed an SDOH screening.

2. Background



Rationale

The Code of Federal Regulations at 42 CFR Part 438—managed care regulations for the Medicaid program and CHIP, with revisions released May 6, 2016, effective July 1, 2017, and further revised on November 13, 2020, with an effective date of December 14, 2020—require states that contract with managed care health plans (health plans) to conduct an EQR of each contracting health plan. Health plans include MCOs. The regulations at 42 CFR §438.358 require that the EQR include analysis and evaluation by an EQRO of aggregated information related to healthcare quality, timeliness, and access. Health Services Advisory Group, Inc. (HSAG), serves as the EQRO for the Department—the agency responsible for the overall administration and monitoring of Colorado’s Medicaid managed care program and CHP+, Colorado’s program to implement CHIP managed care. The Department contracts with four CHP+ MCOs across the State.

In its PIP evaluation and validation, HSAG used the Department of Health and Human Services, CMS publication, *Protocol 1. Validation of Performance Improvement Projects: A Mandatory EQR-Related Activity*, February 2023 (CMS EQR Protocol 1).¹ HSAG’s evaluation of the PIP includes two key components of the quality improvement (QI) process:

1. HSAG evaluates the technical structure of the PIP to ensure that RMHP designs, conducts, and reports the PIP in a methodologically sound manner, meeting all State and federal requirements. HSAG’s review determines whether the PIP design (e.g., PIP Aim statement, population, sampling methods, performance indicator, and data collection methodology) is based on sound methodological principles and could reliably measure outcomes. Successful execution of this component ensures that reported PIP results are accurate and capable of measuring sustained improvement.
2. HSAG evaluates the implementation of the PIP. Once designed, an MCO’s effectiveness in improving outcomes depends on the systematic data collection process, analysis of data, and the identification of barriers and subsequent development of relevant interventions. Through this component, HSAG evaluates how well RMHP improves its rates through implementation of effective processes (i.e., barrier analyses, interventions, and evaluation of results).

The goal of HSAG’s PIP validation is to ensure that the Department and key stakeholders can have confidence that the MCO executed a methodologically sound improvement project, and any reported improvement is related to, and can be reasonably linked to, the QI strategies and activities conducted by the MCO during the PIP.

¹ Department of Health and Human Services, Centers for Medicare & Medicaid Services. *Protocol 1. Validation of Performance Improvement Projects: A Mandatory EQR-Related Activity*, February 2023. Available at: <https://www.medicaid.gov/medicaid/quality-of-care/downloads/2023-eqr-protocols.pdf>. Accessed on: Mar 27, 2025.



Validation Overview

For FY 2024–2025, the Department required health plans to conduct PIPs in accordance with 42 CFR §438.330(b)(1). In accordance with §438.330 (d), MCO entities are required to have a quality program that (1) includes ongoing PIPs designed to have a favorable effect on health outcomes and beneficiary satisfaction and (2) focuses on clinical and/or nonclinical areas that involve the following:



Measuring performance using objective quality indicators



Implementing system interventions to achieve improvement in quality



Evaluating effectiveness of the interventions



Planning and initiating of activities for increasing or sustaining improvement

To monitor, assess, and validate PIPs, HSAG uses a standardized scoring methodology to rate a PIP’s compliance with each of the nine steps listed in CMS EQR Protocol 1. With the Department’s input and approval, HSAG developed a PIP Validation Tool to ensure uniform assessment of PIPs. This tool is used to evaluate each of the PIPs for the following nine CMS EQR Protocol 1 steps:

Table 2-1—CMS EQR Protocol 1 Steps

Protocol Steps	
Step Number	Description
1	Review the Selected PIP Topic
2	Review the PIP Aim Statement
3	Review the Identified PIP Population
4	Review the Sampling Method
5	Review the Selected Performance Indicator(s)
6	Review the Data Collection Procedures
7	Review the Data Analysis and Interpretation of PIP Results
8	Assess the Improvement Strategies
9	Assess the Likelihood that Significant and Sustained Improvement Occurred

HSAG obtains the data needed to conduct the PIP validation from RMHP's PIP Submission Form. This form provides detailed information about RMHP's PIP related to the steps completed and evaluated for the 2024–2025 validation cycle.

Each required step is evaluated on one or more elements that form a valid PIP. The HSAG PIP Review Team scores each evaluation element within a given step as *Met*, *Partially Met*, *Not Met*, *Not Applicable*, or *Not Assessed*. HSAG designates evaluation elements pivotal to the PIP process as critical elements. For a PIP to produce valid and reliable results, all critical elements must be *Met*.

In alignment with CMS EQR Protocol 1, HSAG assigns two PIP validation ratings, summarizing overall PIP performance. One validation rating reflects HSAG's confidence that the MCO adhered to acceptable methodology for all phases of design and data collection and conducted accurate data analysis and interpretation of PIP results. This validation rating is based on the scores for applicable evaluation elements in steps 1 through 8 of the PIP Validation Tool. The second validation rating is only assigned for PIPs that have progressed to the Outcomes stage (Step 9) and reflects HSAG's confidence that the PIP's performance indicator results demonstrated evidence of significant improvement. The second validation rating is based on scores from Step 9 in the PIP Validation Tool. For each applicable validation rating, HSAG reports the percentage of applicable evaluation elements that received a *Met* score and the corresponding confidence level: *High Confidence*, *Moderate Confidence*, *Low Confidence*, or *No Confidence*. The confidence level definitions for each validation rating are as follows:

1. Overall Confidence of Adherence to Acceptable Methodology for All Phases of the PIP (Steps 1 Through 8)

- *High Confidence*: High confidence in reported PIP results. All critical evaluation elements were *Met*, and 90 percent to 100 percent of all evaluation elements were *Met* across all steps.
- *Moderate Confidence*: Moderate confidence in reported PIP results. All critical evaluation elements were *Met*, and 80 percent to 89 percent of all evaluation elements were *Met* across all steps.
- *Low Confidence*: Low confidence in reported PIP results. Across all steps, 65 percent to 79 percent of all evaluation elements were *Met*; or one or more critical evaluation elements were *Partially Met*.
- *No Confidence*: No confidence in reported PIP results. Across all steps, less than 65 percent of all evaluation elements were *Met*; or one or more critical evaluation elements were *Not Met*.

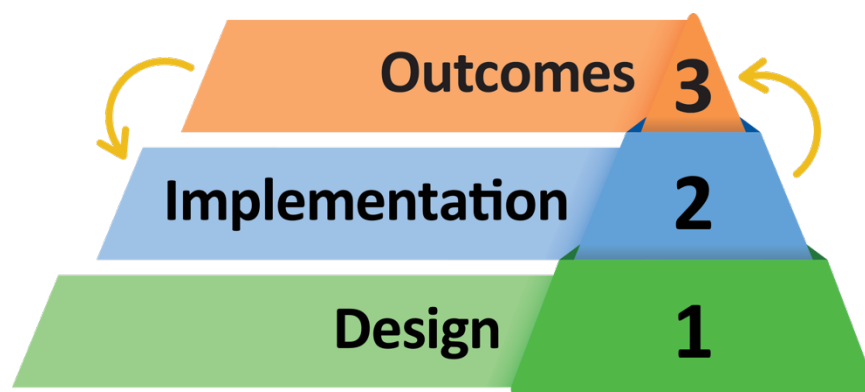
2. Overall Confidence That the PIP Achieved Significant Improvement (Step 9)

- *High Confidence*: All performance indicators demonstrated *statistically significant* improvement over the baseline.
- *Moderate Confidence*: One of the three scenarios below occurred:
 - All performance indicators demonstrated improvement over the baseline, **and** some but not all performance indicators demonstrated *statistically significant* improvement over the baseline.
 - All performance indicators demonstrated improvement over the baseline, **and** none of the performance indicators demonstrated *statistically significant* improvement over the baseline.

- Some but not all performance indicators demonstrated improvement over baseline, **and** some but not all performance indicators demonstrated *statistically significant* improvement over baseline.
- *Low Confidence*: The remeasurement methodology was not the same as the baseline methodology for at least one performance indicator **or** some but not all performance indicators demonstrated improvement over the baseline and none of the performance indicators demonstrated *statistically significant* improvement over the baseline.
- *No Confidence*: The remeasurement methodology was not the same as the baseline methodology for all performance indicators **or** none of the performance indicators demonstrated improvement over the baseline.

Figure 2-1 illustrates the three stages of the PIP process—Design, Implementation, and Outcomes. Each sequential stage provides the foundation for the next stage. The Design stage establishes the methodological framework for the PIP. The activities in this section include development of the PIP topic, Aim statement, population, sampling techniques, performance indicator(s), and data collection processes. To implement successful improvement strategies, a strong methodologically sound design is necessary.

Figure 2-1—Stages of the PIP Process



Once RMHP establishes its PIP design, the PIP progresses into the Implementation stage (Steps 7–8). During this stage, RMHP evaluates and analyzes its data, identifies barriers to performance, and develops interventions targeted to improve outcomes. The implementation of effective improvement strategies is necessary to improve outcomes. The Outcomes stage (Step 9) is the final stage, which involves the evaluation of statistically significant improvement, and sustained improvement based on reported results and statistical testing. Sustained improvement is achieved when performance indicators demonstrate statistically significant improvement over baseline performance through repeated measurements over comparable time periods. This stage is the culmination of the previous two stages. If the outcomes do not improve, RMHP should revise its causal/barrier analysis processes and adapt QI strategies and interventions accordingly.

3. Findings



Validation Findings

HSAG’s validation evaluates the technical methods of the PIP (i.e., the design, data analysis, implementation, and outcomes). Based on its review, HSAG determined the overall methodological validity of the PIP. Table 3-1 summarizes the health plan’s PIPs validated during the review period with an overall confidence level of *High Confidence*, *Moderate Confidence*, *Low Confidence* or *No Confidence* for the two required confidence levels identified below. In addition, Table 3-1 displays the percentage score of evaluation elements that received a *Met* score, as well as the percentage score of critical elements that received a *Met* score. Critical elements are those within the PIP Validation Tool that HSAG has identified as essential for producing a valid and reliable PIP.

Table 3-1 illustrates the initial submission and resubmission validation scores for each PIP.

Table 3-1—2024–2025 PIP Overall Confidence Levels for RMHP

PIP Title	Type of Review ¹	Validation Rating 1			Validation Rating 2		
		Overall Confidence of Adherence to Acceptable Methodology for All Phases of the PIP			Overall Confidence That the PIP Achieved Significant Improvement		
		Percentage Score of Evaluation Elements <i>Met</i> ²	Percentage Score of Critical Elements <i>Met</i> ³	Confidence Level ⁴	Percentage Score of Evaluation Elements <i>Met</i> ²	Percentage Score of Critical Elements <i>Met</i> ³	Confidence Level ⁴
<i>WCV Rates for RMHP CHP+ Members</i>	Initial Submission	93%	89%	<i>Low Confidence</i>	100%	100%	<i>High Confidence</i>
	Resubmission	93%	89%	<i>Low Confidence</i>	100%	100%	<i>High Confidence</i>
<i>Improving the Rate of SDOH Screening for CHP+ Members</i>	Initial Submission	81%	78%	<i>Low Confidence</i>	67%	100%	<i>Moderate Confidence</i>
	Resubmission	88%	89%	<i>Low Confidence</i>	67%	100%	<i>Moderate Confidence</i>

¹ **Type of Review**—Designates the PIP review as an initial submission, or resubmission. A resubmission means the MCO resubmitted the PIP with updated documentation to address HSAG’s initial validation feedback.

² **Percentage Score of Evaluation Elements *Met***—The percentage score is calculated by dividing the total elements *Met* (critical and non-critical) by the sum of the total elements of all categories (*Met*, *Partially Met*, and *Not Met*).

³ **Percentage Score of Critical Elements *Met***—The percentage score of critical elements *Met* is calculated by dividing the total critical elements *Met* by the sum of the critical elements *Met*, *Partially Met*, and *Not Met*.

⁴ **Confidence Level**—Based on the scores assigned for individual evaluation elements and the confidence level definitions provided in the PIP Validation Tool.

The *WCV Rates for RMHP CHP+ Members* PIP was validated through all nine steps of the PIP Validation Tool. For Validation Rating 1, HSAG assigned a *Low Confidence* level for adhering to acceptable PIP methodology. RMHP received *Met* scores for 100 percent of applicable evaluation elements in the Design (Steps 1–6) stage and 88 percent of applicable evaluation elements in the Implementation (Steps 7–8) stage of the PIP. In Step 7, one evaluation element was scored *Partially Met* due to errors in conducting statistical testing. For Validation Rating 2, HSAG assigned a *High Confidence* level that the PIP achieved significant improvement. HSAG assigned a *High Confidence* level for Validation Rating 2 because the performance indicator results demonstrated a statistically significant improvement over baseline performance at the first remeasurement.

The *Improving the Rate of SDOH Screening for CHP+ Members* PIP was also validated through all nine steps in the PIP Validation Tool. For Validation Rating 1, HSAG assigned a *Low Confidence* level for adhering to acceptable PIP methodology. RMHP received *Met* scores for 100 percent of applicable evaluation elements in the Design (Steps 1–6) stage and 75 percent of applicable evaluation elements in the Implementation (Steps 7–8) stage of the PIP. In Step 7, two evaluation elements were scored *Partially Met* due to errors in conducting and reporting statistical testing. For Validation Rating 2, HSAG assigned a *High Confidence* level that the PIP achieved significant improvement. HSAG assigned a *High Confidence* level for Validation Rating 2 because the performance indicator results demonstrated a statistically significant improvement over baseline performance at the first remeasurement.

Scores and feedback for individual evaluation elements and steps are provided for each PIP in Appendix B. Final PIP Validation Tools.



Analysis of Results

Table 3-2 displays data for RMHP's *WCV Rates for RMHP CHP+ Members* PIP.

Table 3-2—Performance Indicator Results for the *WCV Rates for RMHP CHP+ Members* PIP

Performance Indicator	Baseline (7/1/2022 to 6/30/2023)		Remeasurement 1 (7/1/2023 to 6/30/2024)		Remeasurement 2 (7/1/2024 to 6/30/2025)		Sustained Improvement
The percentage of eligible CHP+ members ages 3 to 21 years who completed one or more well-care visits during the measurement year.	N: 2,513	47.9%	N: 5,356	51.4%			
	D: 5,251		D: 10,431				

N—Numerator D—Denominator

HSAG rounded percentages to the first decimal place.

For the baseline measurement period, RMHP reported that 47.9 percent of eligible CHP+ members ages 3 to 21 years who completed one or more well-care visits during the measurement year.

For the first remeasurement period, RMHP reported that 51.4 percent of eligible CHP+ members ages 3 to 21 years completed one or more well-care visits during the measurement year. Compared to baseline results, the Remeasurement 1 results demonstrated a statistically significant increase of 3.5 percentage points in the percentage of eligible members who completed a well-care visit.

Table 3-3 displays data for RMHP's *Improving the Rate of SDOH Screening for CHP+ Members* PIP.

Table 3-3—Performance Indicator Results for the *Improving the Rate of SDOH Screening for CHP+ Members* PIP

Performance Indicator	Baseline (7/1/2022 to 6/30/2023)		Remeasurement 1 (7/1/2023 to 6/30/2024)		Remeasurement 2 (7/1/2024 to 6/30/2025)		Sustained Improvement
The percentage of eligible CHP+ members who had at least one billed encounter in the measurement year and who completed an SDOH screening.	N: 98	1.6%	N: 204	1.8%			
	D: 6,160		D: 11,551				

N—Numerator D—Denominator

HSAG rounded percentages to the first decimal place.

For the baseline measurement period, RMHP reported that 1.6 percent of eligible CHP+ members who had at least one billed encounter were screened for SDOH during the measurement year.

For the first remeasurement period, RMHP reported that 1.8 percent of eligible CHP+ members who had at least one billed encounter were screened for SDOH during the measurement year. Compared to Baseline results, the Remeasurement 1 results demonstrated an increase in the percentage of eligible members who completed an SDOH screening of 0.2 percentage point, which was not statistically significant.



Barriers/Interventions

The identification of barriers through barrier analysis and the subsequent selection of appropriate interventions to address these barriers are necessary steps to improve outcomes. RMHP's choice of interventions, combination of intervention types, and sequence of implementing the interventions are essential to the overall success in improving PIP rates.

Table 3-4 displays the barriers and interventions documented by RMHP for the *WCV Rates for RMHP CHP+ Members* PIP.

Table 3-4—Barriers and Interventions for the WCV Rates for RMHP CHP+ Members PIP

Barriers	Interventions
<ul style="list-style-type: none"> Lack of member understanding of the importance of a well-child visit. Lack of member motivation and activation to receive a well-child visit and establish care with a primary care provider. 	WCV Member Rewards Program to incentivize member/caregivers for completing a well-child visit.
Difficulty accessing care, which includes establishing and scheduling WCVs with a primary care provider.	Live member outreach calls to assist with scheduling the well-child visit.

Table 3-5 displays the barriers and interventions documented by RMHP for the *Improving the Rate of SDOH Screening for CHP+ Members PIP*.

Table 3-5—Barriers and Interventions for the Improving the Rate of SDOH Screening for CHP+ Members PIP

Barriers	Interventions
<ul style="list-style-type: none"> Less engagement from providers when work is not reimbursed. No code specifically set to reimburse screening for SDOH. 	Provider payment for SDOH screening of members.
<ul style="list-style-type: none"> High rates of staff turnover require periodic re-training. SDOH screening and intervening appropriately can lead to cumbersome workflows. Need for meaningful storage of SDOH data and communication of information across care teams. 	Provider coaching on effective and efficient SDOH screening practices.

4. Conclusions and Recommendations



Conclusions

For this year's validation cycle, RMHP submitted the clinical *WCV Rates for RMHP CHP+ Members* PIP and the nonclinical *Improving the Rate of SDOH Screening for CHP+ Members* PIP. RMHP reported Remeasurement 1 performance indicator results for both PIPs, and both PIPs were validated through Step 9 (Outcomes stage). Both PIPs received a *Low Confidence* level for adherence to acceptable PIP methodology in the Design and Implementation stages. In the Outcomes stage, the *WCV Rates for RMHP CHP+ Members* PIP received a *High Confidence* level that the PIP achieved significant improvement and the *Improving the Rate of SDOH Screening for CHP+ Members* PIP received a *Moderate Confidence* level that the PIP achieved significant improvement.

HSAG's PIP validation findings suggest a thorough application of the PIP Design stage (Steps 1 through 6) for both PIPs. A methodologically sound design created the foundation for RMHP to progress to subsequent PIP stages—collecting data and carrying out interventions to positively impact performance indicator results and outcomes for the project. In the Implementation stage (Steps 7 and 8), RMHP accurately reported performance indicator data and initiated methodologically sound improvement strategies for both PIPs; however, the health plan received *Partially Met* scores in Step 7 for both PIPs due to errors in statistical testing. In the Outcomes stage (Step 9), Remeasurement 1 results for the *WCV Rates for RMHP CHP+ Members* PIP demonstrated statistically significant improvement over baseline results. Remeasurement 1 results for the *Improving the Rate of SDOH Screening for CHP+ Members* PIP demonstrated a slight improvement compared to baseline; however, the increase in SDOH screening was not statistically significant. RMHP will progress to reporting Remeasurement 2 indicator results for both PIPs, and one PIP, *WCV Rates for RMHP CHP+ Members*, will progress to being evaluated for achieving sustained improvement for next year's validation.



Recommendations

Based on the validation of each PIP, HSAG has the following recommendations:

- Review statistical testing procedures and ensure that statistical test results comparing performance indicator results for each remeasurement period to baseline results are accurately reported throughout the submission form for each PIP.
- Revisit causal/barrier analyses at least annually to ensure timely and accurate identification and prioritization of barriers and opportunities for improvement.
- Use QI tools such as a key driver diagram, process mapping, and/or failure modes and effects analyses to determine and prioritize barriers and process gaps or weaknesses, as part of the causal/barrier analyses.

- Use Plan-Do-Study-Act (PDSA) cycles to meaningfully evaluate the effectiveness of each intervention. The MCO should select intervention effectiveness measures that directly monitor intervention impact and evaluate measure results frequently throughout each measurement period. The intervention evaluation results should drive next steps for interventions and determine whether they should be continued, expanded, revised, or replaced.

Appendix A. Final PIP Submission Forms

Appendix A contains the final PIP Submission Forms that RMHP submitted to HSAG for validation. HSAG made only minor grammatical corrections to these forms; the content/meaning was not altered. This appendix does not include any attachments provided with the PIP submission.



Appendix A: State of Colorado 2024-25 PIP Submission Form
Well-Child Visit (WCV) Rates for RMHP CHP+ Members
for Rocky Mountain Health Plan - CHP+



Demographic Information	
Managed Care Organization (MCO) Name: <u>Rocky Mountain Health Plan – CHP+</u>	
Project Leader Name: <u>Kim Herek</u>	Title: <u>Quality Improvement Director</u>
Telephone Number: <u>402-917-1833</u>	Email Address: <u>Kimberly.herek@uhc.com</u>
PIP Title: <u>Well-Child Visit (WCV) Rates for RMHP CHP+ Members</u>	
Submission Date: <u>10/31/2024</u>	
Resubmission Date (if applicable): <u>1/22/2025</u>	



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for Rocky Mountain Health Plan – CHP+



Step 1: Select the PIP Topic. The topic should be selected based on data that identify an opportunity for improvement. The goal of the project should be to improve member health, functional status, and/or satisfaction. The topic may also be required by the State.

PIP Topic:

Well child visit rates (WCV) for the RMHP CHP Members.

Provide plan-specific data:

For 7/1/2022-6/30/2023, the WCV rate for RMHP CHP Members was 47.86%. The most recent 90th HEDIS national benchmark available (MY2021) was 62.70%, and RMHP has consistently performed at the 50th percentile benchmark for calendar years 2021 and 2022. Due to performing below benchmark, this provides opportunity to improve this measure.

Describe how the PIP topic has the potential to improve member health, functional status, and/or satisfaction:

By increasing well child visit rates, it supports improving member health and satisfaction in the following ways:

- Fostering a relationship between Member/Member guardian(s) and primary care providers with their care teams. This improves member satisfaction and patient activation.
- Creates continuity of care addressing developmental needs throughout childhood and adolescence to support overall member health
- Increase rates of childhood and adolescent immunizations to support overall member health
- Where applicable, behavioral health and/or dental health may be integrated into well visit to support whole person health care



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Step 2: Define the PIP Aim Statement(s). Defining the Aim statement(s) helps maintain the focus of the PIP and sets the framework for data collection, analysis, and interpretation.

The statement(s) should:

- ◆ Be structured in the recommended X/Y format: “Does doing X result in Y?”
- ◆ The statement(s) must be documented in clear, concise, and measurable terms.
- ◆ Be answerable based on the data collection methodology and indicator(s) of performance.

Statement(s):

- Does leveraging member rewards programs and primary care provider value-based contract requirements increase well-child visit rates for the RMHP CHP population?



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Well-Child Visit (WCV) Rates for RMHP CHP+ Members
for Rocky Mountain Health Plan – CHP+



Step 3: Define the PIP Population. The PIP population must be clearly defined to represent the population to which the PIP Aim statement(s) and indicator(s) apply.

The population definition must:

- ◆ Include the requirements for the length of enrollment, continuous enrollment, new enrollment, and allowable gap criteria.
- ◆ Include the age range and the anchor dates used to identify age criteria, if applicable.
- ◆ Include all inclusion, exclusion, and diagnosis criteria used to identify the eligible population.
- ◆ Include a list of diagnosis/procedure/pharmacy/billing codes used to identify the eligible population, if applicable. Codes identifying numerator compliance should not be provided in Step 3.
- ◆ Capture all members to whom the statement(s) applies.
- ◆ Include how race and ethnicity will be identified, if applicable.
- ◆ If members with special healthcare needs were excluded, provide the rationale for the exclusion.

Population definition:

CHP Members ages 3 to 21 as of December 31 of the measurement year

Enrollment requirements (if applicable):

No more than one gap in enrollment of up to 45 days during the continuous enrollment period. To determine continuous enrollment for beneficiary for whom enrollment is verified monthly, the beneficiary may not have more than a 1-month gap in coverage (e.g., a beneficiary whose coverage lapses for 2 months [60 days] is not considered continuously enrolled)

Member age criteria (if applicable):

Ages 3 to 21 as of December 31 of the measurement year. Anchor date: December 31 of the measurement year.

Inclusion, exclusion, and diagnosis criteria:

Beneficiaries in hospice or using hospice services anytime during the measurement year.

Diagnosis/procedure/pharmacy/billing codes used to identify the eligible population (if applicable):

N/A

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Well-Child Visit (WCV) Rates for RMHP CHP+ Members
for Rocky Mountain Health Plan – CHP+

Step 4: Use Sound Sampling Methods. If sampling is used to select members of the population (denominator), proper sampling methods are necessary to ensure valid and reliable results. Sampling methods must be in accordance with generally accepted principles of research design and statistical analysis. If sampling was not used, please leave table blank and document that sampling was not used in the space provided below the table.

The description of the sampling methods must:

- ◆ Include components identified in the table below.
- ◆ Be updated annually for each measurement period and for each indicator.
- ◆ Include a detailed narrative description of the methods used to select the sample and ensure sampling methods support generalizable results.

Measurement Period	Performance Indicator Title	Sampling Frame Size	Sample Size	Margin of Error and Confidence Level
MM/DD/YYYY– MM/DD/YYYY				

Describe in detail the methods used to select the sample:

Sampling methods were not used.

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Step 5: Select the Performance Indicator(s). A performance indicator is a quantitative or qualitative characteristic or variable that reflects a discrete event or a status that is to be measured. The selected indicator(s) must track performance or improvement over time. The indicator(s) must be objective, clearly, and unambiguously defined, and based on current clinical knowledge or health services research.

The description of the Indicator(s) must:

- ◆ Include the complete title of each indicator.
- ◆ Include the rationale for selecting the indicator(s).
- ◆ Include a narrative description of each numerator and denominator.
- ◆ If indicator(s) are based on nationally recognized measures (e.g., HEDIS, CMS Core Set), include the year of the technical specifications used for the applicable measurement year and update the year annually.
- ◆ Include complete dates for all measurement periods (with the month, day, and year).
- ◆ Include the mandated goal or target, if applicable. If no mandated goal or target enter “Not Applicable.”

Indicator 1	CMS Core Measure – WCV-CH
	The CMS Core Measure – WCV-CH was selected because it is a nationally developed and recognized measure. CMS states that the Child Core Set includes children’s quality measures to measure the overall national quality of care for beneficiaries, monitor performance, and improve the quality of health care. By selecting this nationally recognized measure, it improves RMHP’s ability to benchmark, conduct analysis, implement interventions, and monitor performance over time.
Numerator Description:	CHP Members with one or more well-care visits during the measurement year. The well care visit must occur with a PCP or an OB/GYN, but the practitioner does not have to be the practitioner assigned to the child.
Denominator Description:	CHP Members ages 3 to 21 as of December 31 of the measurement year
Baseline Measurement Period	07/1/2022 to 06/30/2023 using 2023 CMS Core Measure Technical Specifications
Remeasurement 1 Period	07/1/2023 to 06/30/2024 using 2024 CMS Core Measure Technical Specifications
Remeasurement 2 Period	07/1/2024 to 06/30/2025 using 2025 CMS Core Measure Technical Specifications
Mandated Goal/Target, if applicable	N/A



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for Rocky Mountain Health Plan – CHP+



Step 6: Valid and Reliable Data Collection. The data collection process must ensure that data collected for each indicator are valid and reliable.

The data collection methodology must include the following:

- ◆ Identification of data elements and data sources.
- ◆ When and how data are collected.
- ◆ How data are used to calculate the indicator percentage.
- ◆ A copy of the manual data collection tool, if applicable.
- ◆ An estimate of the reported administrative data completeness percentage and the process used to determine this percentage.

Data Sources (Select all that apply)

<p><input type="checkbox"/> Manual Data</p> <p>Data Source</p> <p><input type="checkbox"/> Paper medical record abstraction</p> <p><input type="checkbox"/> Electronic health record abstraction</p> <p>Record Type</p> <p><input type="checkbox"/> Outpatient</p> <p><input type="checkbox"/> Inpatient</p> <p><input type="checkbox"/> Other, please explain in narrative section.</p> <p><input type="checkbox"/> Data collection tool attached (required for manual record review)</p>	<p><input checked="" type="checkbox"/> Administrative Data</p> <p>Data Source</p> <p><input checked="" type="checkbox"/> Programmed pull from claims/encounters</p> <p><input type="checkbox"/> Supplemental data</p> <p><input type="checkbox"/> Electronic health record query</p> <p><input type="checkbox"/> Complaint/appeal</p> <p><input type="checkbox"/> Pharmacy data</p> <p><input type="checkbox"/> Telephone service data/call center data</p> <p><input type="checkbox"/> Appointment/access data</p> <p><input type="checkbox"/> Delegated entity/vendor data _____</p> <p><input type="checkbox"/> Other _____</p> <p>Other Requirements</p> <p><input type="checkbox"/> Codes used to identify data elements (e.g., ICD-10, CPT codes)- <u>please attach separately</u></p> <p><input type="checkbox"/> Data completeness assessment attached</p> <p><input type="checkbox"/> Coding verification process attached</p> <p>Estimated percentage of reported administrative data completeness at the time the data are generated: 99.57%</p>	<p><input type="checkbox"/> Survey Data</p> <p>Fielding Method</p> <p><input type="checkbox"/> Personal interview</p> <p><input type="checkbox"/> Mail</p> <p><input type="checkbox"/> Phone with CATI script</p> <p><input type="checkbox"/> Phone with IVR</p> <p><input type="checkbox"/> Internet</p> <p><input type="checkbox"/> Other</p> <p>Other Survey Requirements:</p> <p>Number of waves: _____</p> <p>Response rate: _____</p> <p>Incentives used: _____</p>
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Appendix A: State of Colorado 2024-25 PIP Submission Form
Well-Child Visit (WCV) Rates for RMHP CHP+ Members
for Rocky Mountain Health Plan – CHP+

Step 6: Valid and Reliable Data Collection. The data collection process must ensure that data collected for each indicator are valid and reliable.

The data collection methodology must include the following:

- ◆ Identification of data elements and data sources.
- ◆ When and how data are collected.
- ◆ How data are used to calculate the indicator percentage.
- ◆ A copy of the manual data collection tool, if applicable.
- ◆ An estimate of the reported administrative data completeness percentage and the process used to determine this percentage.

	<p>Description of the process used to calculate the reported administrative data completeness percentage. Include a narrative of how claims lag may have impacted the data reported:</p> <ol style="list-style-type: none"> a. Identify the claims (both paid and IBNR) by Date of Service (DOS) and Input Date (date entered into the claims payment system) b. Pivot data into a table by DOS and Input Date and calculate the percentage of claims input within 60 days and 90 days from the DOS as compared to the total number of claims to date by DOS month (claims input within 60 or 90 days divided by total claims to date) c. Calculate the average completeness across months by 60 and 90 days (% complete for month averaged across all months) d. Calculate the Fiscal Year Completeness with 60 days runout (sum of all fiscal year claims through 2 months after the end of the fiscal year divided by the sum of all claims collected for the fiscal year). This rate will change as we receive additional claims, but by no more than an estimated 7-8% (determined by the average lag by month). Note this is not the impact on the measures, only on data completeness of administrative data. e. Impact on Rates calculated by taking the HEDIS rate calculation for the month following the end of the fiscal year (July 2023) compared to the most recent run of HEDIS rates (October 2023). 	
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Well-Child Visit (WCV) Rates for RMHP CHP+ Members
for Rocky Mountain Health Plan – CHP+



In the space below, describe the step-by-step data collection process used in the production of the indicator results:

Data Elements Collected: Data elements collected are determined by the CMS Core Measure Specifications.

Data Collection Process:

- Claims and Enrollment are extracted from the payment and enrollment systems and loaded into the HEDIS software managed by Inovalon.
- Data is monitored for load and trend accuracy. Any errors are fixed and reloaded.
- HEDIS analytics are then run in the software to produce rates.
- Rates are extracted out of the software using built-in tools.
- Data is loaded into RMHP SQL servers and validated for accuracy. Denominator and numerator data is available at a member and measure level.
- Data is then produced in aggregate for reporting, validated against software rates.

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Well-Child Visit (WCV) Rates for RMHP CHP+ Members
for Rocky Mountain Health Plan – CHP+

Step 7: Indicator Results. Enter the results of the indicator(s) in the table below. For HEDIS-based/CMS Core Set PIPs, the data reported in the PIP Submission Form should match the validated performance measure rate(s).
Enter results for each indicator by completing the table below. *P* values must be reported to four decimal places (i.e., 0.1234). Additional remeasurement period rows can be added, if necessary.

Indicator 1 Title: CMS Core Measure – WCV-CH – NQF1516

Measurement Period	Indicator Measurement	Numerator	Denominator	Percentage	Mandated Goal or Target, if applicable	Statistical Test Used, Statistical Significance, and <i>p</i> Value
07/01/2022–06/30/2023	Baseline	2513	5251	47.86%	N/A for baseline	N/A for baseline
07/01/2023–06/30/2024	Remeasurement 1	5356	10431	51.35%	N/A	Chi-square; Two-tailed, Statistically Significant, <i>p</i> -value = 0.0171
07/01/2024–06/30/2025	Remeasurement 2					

Step 7: Data Analysis and Interpretation of Results. Clearly document the results for each indicator(s). Describe the data analysis performed, the results of the statistical analysis, and a narrative interpretation of the results.

The data analysis and interpretation of indicator results must include the following for each measurement period:

- ◆ Data presented clearly, accurately, and consistently in both table and narrative format.
- ◆ A clear and comprehensive narrative description of the data analysis process, the percentage achieved for the measurement period for each indicator, and the type of two-tailed statistical test used. Statistical testing *p* value results must be calculated and reported to four decimal places (e.g., 0.1234).
- ◆ Statistical testing must be conducted starting with Remeasurement 1 and comparing to the baseline. For example, Remeasurement 1 to the baseline and Remeasurement 2 to the baseline. For purposes of the validation, statistical testing does not need to be conducted between measurement periods (e.g., Remeasurement 1 to Remeasurement 2).
- ◆ Discussion of any random, year-to-year variations; population changes; sampling errors; or statistically significant increases or decreases that occurred during the remeasurement process.
- ◆ A statement indicating whether factors that could threaten (a) the validity of the findings for each measurement period, including the baseline, and (b) the comparability of each remeasurement period to the baseline was identified. If there were no factors identified, this must be documented in Step 7.

Baseline Narrative:

The baseline findings for Indicator 1 demonstrate that less than half of eligible CHP RMHP Members receive a well-child visit during the measurement timeframes. For Indicator 1, 47.86% of CHP Members received a WCV during the baseline period. This data analysis was conducted by using administrative claims data to identify and calculate eligible Members and the number of Members who received a well-child visit from a qualifying practitioner. There are no identified factors that threaten the internal or external validity of the findings.

Baseline to Remeasurement 1 Narrative:

The Remeasurement 1 findings for Indicator 1 demonstrate that just over half of eligible CHP RMHP Members receive a well-child visit during the measurement timeframes. For Indicator 1, 51.35% of CHP Members received a WCV during the baseline period. This data analysis was conducted by using administrative claims data to identify and calculate eligible Members and the number of Members who received a well-child visit from a qualifying practitioner. Performance for Indicator 1 has improved and shown statistically significant improvement.

Baseline to Remeasurement 2 Narrative:

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Step 8: Improvement Strategies. Interventions are developed to target and address causes/barriers identified through the use of quality improvement (QI) processes and tools.

The documentation of Step 8 is organized into the following three sections:

- A. Quality Improvement (QI) Team and Activities Narrative Description
- B. Barriers/Interventions Table: Prioritized barriers and corresponding intervention descriptions
- C. Intervention Worksheet:
 - Intervention Description
 - Intervention Effectiveness Measure
 - Intervention Evaluation Results
 - Intervention Status

A. Quality Improvement (QI) Team and Activities Narrative Description

QI Team Members: Clinical Quality Performance Manager, Clinical Program Managers, Clinical Quality RN, and Data Analysts

This team of staff is comprised of staff from Rocky Mountain Health Plans. RMHP's Clinical Quality Performance Manager leads this effort with intervention support from RMHP's Clinical Quality RN and Clinical Program Managers. They are supported by an internal data analyst to review data, identify gaps, and monitor data on an ongoing basis.

QI process and/or tools used to identify and prioritize barriers:

Well-Child Visits is a prioritized measure for RMHP. The QI team hosts monthly meetings, Internal Quality Workgroups (IQWgs), to discuss barriers, identify improvement areas, and implement interventions for all prioritized measures. From the IQWg discussions and data analysis, the QI team and senior leaders determined that a major barrier to increasing well-child visits is access to care and Member (parent/guardian) understanding the importance of these visits annually.

Step 8: Improvement Strategies. Interventions are developed to target and address causes/barriers identified through the use of quality improvement (QI) processes and tools.

The documentation of Step 8 is organized into the following three sections:

- A. Quality Improvement (QI) Team and Activities Narrative Description
- B. Barriers/Interventions Table: Prioritized barriers and corresponding intervention descriptions
- C. Intervention Worksheet:
 - Intervention Description
 - Intervention Effectiveness Measure
 - Intervention Evaluation Results
 - Intervention Status

B. Barriers/Interventions Table: In the table below, list interventions currently being evaluated, and barrier(s) addressed by each intervention. For each intervention, complete a Step 8 Intervention Worksheet. The worksheet must be completed to the point of intervention progression at the time of the annual PIP submission.

Intervention Title	Barrier(s) Addressed
WCV Member Rewards Program	<ul style="list-style-type: none"> - Member understanding of the importance of a well-child visit - Member motivation and activation to receive a well-child visit and establish care with a primary care provider
Live agent Member calls	<ul style="list-style-type: none"> - Accessing care which includes establishing and scheduling WCVs with a primary care provider

C. Intervention Worksheet: Intervention Effectiveness Measure and Evaluation Results

Complete a Step 8 Intervention Worksheet for each intervention currently being evaluated. The worksheet must be completed to the point of intervention progression at the time of the annual PIP submission.



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Improving the Rate of SDOH Screening for CHP+ Members
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Demographic Information	
Managed Care Organization (MCO) Name: <u>Rocky Mountain Health Plan – CHP+</u>	
Project Leader Name: <u>Kimberly Herek</u>	Title: <u>Director of Quality Improvement</u>
Telephone Number: <u>402-917-1833</u>	Email Address: <u>Kimberly.Herek@uhc.com</u>
PIP Title: <u>Improving the Rate of Social Determinants of Health (SDOH) Screening for CHP+ Members in Region 1</u>	
Submission Date: <u>10/31/2024</u>	
Resubmission Date (if applicable): <u>1/22/2025</u>	



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Step 1: Select the PIP Topic. The topic should be selected based on data that identify an opportunity for improvement. The goal of the project should be to improve member health, functional status, and/or satisfaction. The topic may also be required by the State.

PIP Topic: Increase screening rates for SDOH in the total CHP+ patient population

Provide plan-specific data: RMHP has observed a decline in SDOH screening rates after the end of the Accountable Health Communities Model (AHCM) in 2022. Plan-specific rates demonstrating baseline and Remeasurement Year 1 are reported below in section 7.

Describe how the PIP topic has the potential to improve member health, functional status, and/or satisfaction: Growing evidence shows that addressing unmet SDOH needs like homelessness, hunger, and exposure to violence, can mitigate the harm of situational factors to a person's overall health. As with clinical assessment tools, providers can use the results from SDOH screening tools to inform patients' treatment plans and make referrals to community services.



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Step 2: Define the PIP Aim Statement(s). Defining the Aim statement(s) helps maintain the focus of the PIP and sets the framework for data collection, analysis, and interpretation.

The statement(s) should:

- ◆ Be structured in the recommended X/Y format: “Does doing X result in Y?”
- ◆ The statement(s) must be documented in clear, concise, and measurable terms.
- ◆ Be answerable based on the data collection methodology and indicator(s) of performance.

Statement(s): Does opening access to utilization of different SDOH tools and data feeds, and implementing intervention activities with multiple tools in a variety of clinical settings, improve overall SDOH screening rates?



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Step 3: Define the PIP Population. The PIP population must be clearly defined to represent the population to which the PIP Aim statement(s) and indicator(s) apply.

The population definition must:

- ◆ Include the requirements for the length of enrollment, continuous enrollment, new enrollment, and allowable gap criteria.
- ◆ Include the age range and the anchor dates used to identify age criteria, if applicable.
- ◆ Include all inclusion, exclusion, and diagnosis criteria used to identify the eligible population.
- ◆ Include a list of diagnosis/procedure/pharmacy/billing codes used to identify the eligible population, if applicable. Codes identifying numerator compliance should not be provided in Step 3.
- ◆ Capture all members to whom the statement(s) applies.
- ◆ Include how race and ethnicity will be identified, if applicable.
- ◆ If members with special healthcare needs were excluded, provide the rationale for the exclusion.

Population definition: All unique Members enrolled in CHP+ at any point in the measurement year

Enrollment requirements (if applicable): Enrollment is defined by the State of Colorado's Member enrollment, attribution, and assignment processes described in Section 6.1 of the contract: Children ages 0-18, plus prenatal members and their newborns. Individuals who may qualify for CHP+ are those who earn too much to qualify for Health First Colorado (Colorado's Medicaid Program), but not enough to pay for private health insurance (applicants with household income under 260% of the Federal Poverty Level).

Member age criteria (if applicable): per State Medicaid contract

Inclusion, exclusion, and diagnosis criteria: all Members enrolled in CHP+ for the measurement year, in accordance with State eligibility criteria

Diagnosis/procedure/pharmacy/billing codes used to identify the eligible population (if applicable): per State Medicaid contract

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Step 4: Use Sound Sampling Methods. If sampling is used to select members of the population (denominator), proper sampling methods are necessary to ensure valid and reliable results. Sampling methods must be in accordance with generally accepted principles of research design and statistical analysis. If sampling was not used, please leave table blank and document that sampling was not used in the space provided below the table.

The description of the sampling methods must:

- ◆ Include components identified in the table below.
- ◆ Be updated annually for each measurement period and for each indicator.
- ◆ Include a detailed narrative description of the methods used to select the sample and ensure sampling methods support generalizable results.

Measurement Period	Performance Indicator Title	Sampling Frame Size	Sample Size	Margin of Error and Confidence Level
MM/DD/YYYY– MM/DD/YYYY				

Describe in detail the methods used to select the sample: Sampling was not used as it was not permitted for the non-clinical SDOH Performance Improvement Plan.

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Step 5: Select the Performance Indicator(s). A performance indicator is a quantitative or qualitative characteristic or variable that reflects a discrete event or a status that is to be measured. The selected indicator(s) must track performance or improvement over time. The indicator(s) must be objective, clearly, and unambiguously defined, and based on current clinical knowledge or health services research.

The description of the Indicator(s) must:

- ◆ Include the complete title of each indicator.
- ◆ Include the rationale for selecting the indicator(s).
- ◆ Include a narrative description of each numerator and denominator.
- ◆ If indicator(s) are based on nationally recognized measures (e.g., HEDIS, CMS Core Set), include the year of the technical specifications used for the applicable measurement year and update the year annually.
- ◆ Include complete dates for all measurement periods (with the month, day, and year).
- ◆ Include the mandated goal or target, if applicable. If no mandated goal or target enter “Not Applicable.”

Indicator 1	SDoH Screening Rate for Unique Members in Clinical Settings
	The improvement of SDoH screening rates is a mandated PIP topic for SFY25. RMHP is defining the performance indicator as screening rates for <i>unique</i> members, which will produce more precise results (versus reporting an overall count of SDoH screeners); this will allow for an analysis of screening patterns to inform future interventions to improve screening rates. This indicator (and overall PIP strategy) is specific to SDoH screeners completed in the clinical setting at in-network provider facilities and is separate from/does not include RMHP's Care Management strategy to improve SDoH screening rates.
Numerator Description:	Number of unique members with a completed SDoH screener in the measurement year
Denominator Description:	Number of enrollees in CHP+ during the measurement year who had at least one billed encounter in the measurement year
Baseline Measurement Period	07/1/2022 to 06/30/2023
Remeasurement 1 Period	07/01/2023 to 06/30/2024
Remeasurement 2 Period	07/01/2024 to 06/30/2025
Mandated Goal/Target, if applicable	N/A
Use this area to provide additional information. N/A	



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Step 6: Valid and Reliable Data Collection. The data collection process must ensure that data collected for each indicator are valid and reliable.

The data collection methodology must include the following:

- ◆ Identification of data elements and data sources.
- ◆ When and how data are collected.
- ◆ How data are used to calculate the indicator percentage.
- ◆ A copy of the manual data collection tool, if applicable.
- ◆ An estimate of the reported administrative data completeness percentage and the process used to determine this percentage.

Data Sources (Select all that apply)

<input type="checkbox"/> Manual Data Data Source <input type="checkbox"/> Paper medical record abstraction <input type="checkbox"/> Electronic health record abstraction Record Type <input type="checkbox"/> Outpatient <input type="checkbox"/> Inpatient <input type="checkbox"/> Other, please explain in narrative section. <input type="checkbox"/> Data collection tool attached (required for manual record review)	<input checked="" type="checkbox"/> Administrative Data Data Source <input checked="" type="checkbox"/> Programmed pull from claims/encounters <input type="checkbox"/> Supplemental data <input type="checkbox"/> Electronic health record query <input type="checkbox"/> Complaint/appeal <input type="checkbox"/> Pharmacy data <input type="checkbox"/> Telephone service data/call center data <input type="checkbox"/> Appointment/access data <input type="checkbox"/> Delegated entity/vendor data _____ <input checked="" type="checkbox"/> Other ___Health Information Exchange___ <input checked="" type="checkbox"/> Other ___State 834 files & 820 files___ Other Requirements <input type="checkbox"/> Codes used to identify data elements (e.g., ICD-10, CPT codes)- <u>please attach separately</u> <input type="checkbox"/> Data completeness assessment attached <input type="checkbox"/> Coding verification process attached	<input type="checkbox"/> Survey Data Fielding Method <input type="checkbox"/> Personal interview <input type="checkbox"/> Mail <input type="checkbox"/> Phone with CATI script <input type="checkbox"/> Phone with IVR <input type="checkbox"/> Internet <input type="checkbox"/> Other _____ Other Survey Requirements: Number of waves: _____ Response rate: _____ Incentives used: _____
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Step 6: Valid and Reliable Data Collection. The data collection process must ensure that data collected for each indicator are valid and reliable.

The data collection methodology must include the following:

- ◆ Identification of data elements and data sources.
- ◆ When and how data are collected.
- ◆ How data are used to calculate the indicator percentage.
- ◆ A copy of the manual data collection tool, if applicable.
- ◆ An estimate of the reported administrative data completeness percentage and the process used to determine this percentage.

	<p>Estimated percentage of reported administrative data completeness at the time the data are generated: _100_ % complete.</p> <p>Description of the process used to calculate the reported administrative data completeness percentage. The data collected to report the numerator of the performance indicator was derived from SDOH screener data from QHN and state enrollment files. The screener data was transferred to the RMHP SQL Server in a daily feed. The numerator reported in the baseline data was gathered in September 2024 for the measurement period ending on June 30th, 2024; since RMHP received screener data in a daily feed and the baseline report was compiled a full month after the end of the measurement period, all available screens in QHN were captured and can be considered a complete data set. As additional layer of data validation for matching a SDOH screener with the member, the screener data that was merged with State enrollment files was scrubbed using a hierarchy of member identification factors (Medicaid ID, DOB, first/last name, address) to match the screeners to members. Screeners that could not be matched to a unique member were not included in the baseline or remeasurement data (resulting in 100% completeness rate for screener-to-member match for this component of the data set).</p>	
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Step 6: Valid and Reliable Data Collection. The data collection process must ensure that data collected for each indicator are valid and reliable.

The data collection methodology must include the following:

- ◆ Identification of data elements and data sources.
- ◆ When and how data are collected.
- ◆ How data are used to calculate the indicator percentage.
- ◆ A copy of the manual data collection tool, if applicable.
- ◆ An estimate of the reported administrative data completeness percentage and the process used to determine this percentage.

	<p>Include a narrative of how claims lag may have impacted the data reported: Claims data used to complete the denominator is pulled at least 120 days after the end of the measurement year, thus allowing ample time for claims lag.</p>	
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In the space below, describe the step-by-step data collection process used in the production of the indicator results:

Data Elements Collected: For the first remeasurement period, completed SDOH screeners and RMHP member enrollment data were the two elements collected.

Data Collection Process:

- The RMHP Data Analytics team extracted SDOH screening data for screeners that occurred within the 12-month reporting period (July 1, 2023 – June 30, 2024) from the RMHP SQL Server.
- This data was merged and matched to the internal membership files (834 and 820 files) according to line of business (RAE), using the Medicaid ID provided in the SDOH screening data. A scrub was completed comparing the Medicaid ID and member identification factors (DOB, first/last name, address) to validate that the member demographic information included with the SDOH screener is correct and that the member was enrolled in the respective Medicaid plan on the screening date.
- The data was pivoted into a table that produced SDOH screening totals
- The numerator data (count of SDOH screeners) was deduplicated by unique member in the final remeasurement report
- In addition to the AHCM screener reported at baseline, the PIP interventions and data reported in remeasurement years will be incorporating different tools selected by providers. All SDOH screeners will be evaluated to ensure that the tool is addressing the four required domains; blank copies of the SDOH screeners will be provided with each PIP remeasurement submission.
- Using the State 834 and 820 files, enrollment numbers for the applicable line of business were totaled by unique Medicaid ID, producing the denominator for the performance indicator; using this list, the data was further filtered using claims data to produce a list of unique enrollees who had at least one encounter during the measurement period.

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Step 7: Indicator Results. Enter the results of the indicator(s) in the table below. For HEDIS-based/CMS Core Set PIPs, the data reported in the PIP Submission Form should match the validated performance measure rate(s).
 Enter results for each indicator by completing the table below. *P* values must be reported to four decimal places (i.e., 0.1234). Additional remeasurement period rows can be added, if necessary.

Indicator 1 Title: SDOH Screening Rate for Unique Members in Clinical Settings						
Measurement Period	Indicator Measurement	Numerator	Denominator	Percentage	Mandated Goal or Target, if applicable	Statistical Test Used, Statistical Significance, and <i>p</i> Value
07/01/2022-06/30/2023	Baseline	98	6160	1.59%	N/A for baseline	N/A for baseline
07/01/2023-06/30/2024	Remeasurement 1	204	11,551	1.77%	N/A for RMY1	Chi-square with Yates Correction; Chi square value is 0.426 with 1 degrees of freedom; the two-tailed <i>P</i> value equals 0.5140
07/01/2024-06/30/2025	Remeasurement 2					



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Step 7: Data Analysis and Interpretation of Results. Clearly document the results for each indicator(s). Describe the data analysis performed, the results of the statistical analysis, and a narrative interpretation of the results.

The data analysis and interpretation of indicator results must include the following for each measurement period:

- ◆ Data presented clearly, accurately, and consistently in both table and narrative format.
- ◆ A clear and comprehensive narrative description of the data analysis process, the percentage achieved for the measurement period for each indicator, and the type of two-tailed statistical test used. Statistical testing *p* value results must be calculated and reported to four decimal places (e.g., 0.1234).
- ◆ Statistical testing must be conducted starting with Remeasurement 1 and comparing to the baseline. For example, Remeasurement 1 to the baseline and Remeasurement 2 to the baseline. For purposes of the validation, statistical testing does not need to be conducted between measurement periods (e.g., Remeasurement 1 to Remeasurement 2).
- ◆ Discussion of any random, year-to-year variations; population changes; sampling errors; or statistically significant increases or decreases that occurred during the remeasurement process.
- ◆ A statement indicating whether factors that could threaten (a) the validity of the findings for each measurement period, including the baseline, and (b) the comparability of each remeasurement period to the baseline was identified. If there were no factors identified, this must be documented in Step 7.

Baseline Narrative: SDOH screening rates remain low at 1.59% after an observed downward trend following the end of the Accountable Health Communities Model (AHCM) demonstration in 2022. A key assumption to explain the decrease in screening rates is the termination of AHCM programmatic support including deployment and QI coaching, staff training, financial incentives, and technical assistance with electronic screening tools. With the termination of AHCM, new SDOH screening tools will be introduced for use in the clinical setting based on provider requests. It is anticipated this will have statistical impact on the remeasurement data (e.g. new reports are being built to accommodate the different tools, and data will likely be consolidated from multiple sources).

Baseline to Remeasurement 1 Narrative: In Remeasurement Year 1, the SDOH screening rate improved by 0.18%. Using a Chi-square with Yates Correction statistical test, the chi-square value equals 0.426 with 1 degree of freedom, and two-tailed P value of 0.5140. The association between the baseline and remeasurement year is considered to be not statistically significant. Although there was a slight increase, the overall results were affected by the delay in establishing the payment methodology for providers as an incentive to screen for SDOH. This delay also postponed the communication to providers regarding the payment; Providers were informed of the payment policy for SDOH screeners on March 29, 2024, and the policy went into effect on May 1, 2024. Consequently, providers had two months remaining in the Remeasurement



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Step 7: Data Analysis and Interpretation of Results. Clearly document the results for each indicator(s). Describe the data analysis performed, the results of the statistical analysis, and a narrative interpretation of the results.

The data analysis and interpretation of indicator results must include the following for each measurement period:

- ◆ Data presented clearly, accurately, and consistently in both table and narrative format.
- ◆ A clear and comprehensive narrative description of the data analysis process, the percentage achieved for the measurement period for each indicator, and the type of two-tailed statistical test used. Statistical testing p value results must be calculated and reported to four decimal places (e.g., 0.1234).
- ◆ Statistical testing must be conducted starting with Remeasurement 1 and comparing to the baseline. For example, Remeasurement 1 to the baseline and Remeasurement 2 to the baseline. For purposes of the validation, statistical testing does not need to be conducted between measurement periods (e.g., Remeasurement 1 to Remeasurement 2).
- ◆ Discussion of any random, year-to-year variations; population changes; sampling errors; or statistically significant increases or decreases that occurred during the remeasurement process.
- ◆ A statement indicating whether factors that could threaten (a) the validity of the findings for each measurement period, including the baseline, and (b) the comparability of each remeasurement period to the baseline was identified. If there were no factors identified, this must be documented in Step 7.

Year (Fiscal Year 23-24) to establish or streamline previous SDOH screening workflows and build the necessary technological infrastructure with to capture the results.

Baseline to Remeasurement 2 Narrative:

Step 8: Improvement Strategies. Interventions are developed to target and address causes/barriers identified through the use of quality improvement (QI) processes and tools.

The documentation of Step 8 is organized into the following three sections:

- A. Quality Improvement (QI) Team and Activities Narrative Description
- B. Barriers/Interventions Table: Prioritized barriers and corresponding intervention descriptions
- C. Intervention Worksheet:
 - Intervention Description
 - Intervention Effectiveness Measure
 - Intervention Evaluation Results
 - Intervention Status

A. Quality Improvement (QI) Team and Activities Narrative Description

QI Team Members: Clinical Program Manager specializing in Integrated Behavioral Health, Strategy and Program Manager, Data Analysts, Data Management Partners from Quality Health Network (QHN)

This team is mostly comprised of staff from Rocky Mountain Health Plans with some additional support from our data management partners at Quality Health Network (QHN). RMHP's Strategy and Program Manager leads this effort with intervention support from RMHP's Clinical Program Manager specializing in Integrated Behavioral Health. They are supported by an internal data analyst to review current data feeds, identify gaps, and monitor data on an ongoing basis. Senior leaders at RMHP have provided strategy support for policy development, especially as it pertains to payment.

QI process and/or tools used to identify and prioritize barriers:

The QI team reflected upon lessons learned from the Accountable Health Communities Model (AHCM) program, which ended in 2022, incorporating feedback from providers, staff members, and other key stakeholders. They reviewed data for rates of screening during the AHCM program and compared to rates of screening after AHCM had ended, noted that rates of screening were trending downwards now that there was not programmatic support to encourage this effort. The QI team and senior leaders determined that a major barrier to increasing screening rates could be addressed by providing reimbursement for SDOH screening comparable to that for depression screening and providing access to additional screening tools.

Step 8: Improvement Strategies. Interventions are developed to target and address causes/barriers identified through the use of quality improvement (QI) processes and tools.

The documentation of Step 8 is organized into the following three sections:

- A. Quality Improvement (QI) Team and Activities Narrative Description
- B. Barriers/Interventions Table: Prioritized barriers and corresponding intervention descriptions
- C. Intervention Worksheet:
 - Intervention Description
 - Intervention Effectiveness Measure
 - Intervention Evaluation Results
 - Intervention Status

B. Barriers/Interventions Table: In the table below, list interventions currently being evaluated, and barrier(s) addressed by each intervention. For each intervention, complete a Step 8 Intervention Worksheet. The worksheet must be completed to the point of intervention progression at the time of the annual PIP submission.

Intervention Title	Barrier(s) Addressed
Payment for SDOH Screening	<ul style="list-style-type: none"> • Less engagement from providers when work is not reimbursed • No code specifically set to reimburse screening for SDOH
Provider Coaching	<ul style="list-style-type: none"> • High rates of staff turnover require periodic re-training • SDOH screening and intervening appropriately can lead to cumbersome workflows • Meaningful storage of SDOH data and communication of information across care teams

C. Intervention Worksheet: Intervention Effectiveness Measure and Evaluation Results

Complete a Step 8 Intervention Worksheet for each intervention currently being evaluated. The worksheet must be completed to the point of intervention progression at the time of the annual PIP submission.

Appendix A1. Intervention Worksheets

Appendix A1 contains the completed Intervention Worksheets that RMHP provided for validation. HSAG made only minor grammatical corrections to these forms and did not alter the content/meaning.

Appendix A1-1: State of Colorado PIP Intervention Worksheet
Well-Child Visit (WCV) Rates for RMHP CHP+ Members
for Rocky Mountain Health Plan – CHP+

Managed Care Organization (MCO) Information	
MCO Name	Rocky Mountain Health Plan – CHP+
PIP Title	<i>Well-Child Visit (WCV) Rates for RMHP CHP+ Members</i>
Intervention Title	WCV Member Rewards Program

Appendix A1-1: State of Colorado PIP Intervention Worksheet
Well-Child Visit (WCV) Rates for RMHP CHP+ Members
for Rocky Mountain Health Plan – CHP+

Instructions: Complete a separate worksheet for each intervention.

Intervention Description			
Intervention Title	WCV Member Rewards Program		
What barrier(s) are addressed?	Member understanding of the importance of a well-child visit Member motivation and activation to receive a well-child visit and establish care with a primary care provider		
Describe how the intervention is culturally and linguistically appropriate.	Incentive and educational information is offered in Spanish. When a Member outreaches to Customer Service, additional languages are available.		
Intervention Process Steps (<i>List the step-by-step process required to carry out this intervention.</i>)	1. Identify eligible population. 2. Collaborate with UnitedHealthcare Member Rewards team to ensure marketing materials are acceptable. 3. UnitedHealthcare Member Rewards team sends out Member incentive information with education. 4. UnitedHealthcare Member Rewards team and RMHP monitor progress.		
Intervention Start Date	07/01/2023	Intervention End Date	6/30/2024



Appendix A1-1: State of Colorado PIP Intervention Worksheet
Well-Child Visit (WCV) Rates for RMHP CHP+ Members
for Rocky Mountain Health Plan – CHP+



Intervention Effectiveness Measure			
Intervention Effectiveness Measure Title	Member Incentive Rate of Return		
Numerator description (narrative)	# of Members who received the WCV Incentive		
Denominator description (narrative)	# of Members who were eligible to receive the WCV Incentive		
Intervention Evaluation Period Dates (MM/DD/YYYY-MM/DD/YYYY)	Numerator	Denominator	Percentage
05/01/2023-12/31/2023	410	4,157	9.86%
05/01/2024-12/31/2024	TBD	TBD	TBD
05/01/2025-12/31/2025	TBD	TBD	TBD
If qualitative data were collected, provide a narrative summary of results below.			
In 2023, CHP+ Member rewards were transitioned from an internal process at RMHP to a vendor at UnitedHealthcare (UHC) called Taylor Member Rewards. Based off the final performance Rate of Return (RoR), the program demonstrated an overall increase in RoR from 2022 at 7.29% to 9.86% in 2023.			

Appendix A1-1: State of Colorado PIP Intervention Worksheet
Well-Child Visit (WCV) Rates for RMHP CHP+ Members
for Rocky Mountain Health Plan – CHP+

Intervention Evaluation Results
What lessons did the MCO learn from the intervention testing and evaluation results? <p>Overall, RMHP identified that there was an increase in the final Rate of Return (RoR) with the transition of the Member Rewards program to that national UHC program. UHC has different requirements and processes than RMHP's program historically required in order for Members to receive their gift card reward. While RMHP requested Members to have their primary care provider fill out and sign the incentive form and mail/fax back to RMHP, UHC verifies services off claims and the rewards money gets automatically added to a gift card. The change in this process has not decreased Members' participation, only the administrative tasks required of providers and Members.</p>
What challenges were encountered? <p>Due to RMHP no longer directly sending the incentives, the challenge encountered was identifying the correct contact and access to the Member rewards reports in order to monitor and analyze the RoR. Additionally, because this intervention is looking specifically at CHP+ Members, it was imperative that the vendor be able to separate out all RMHP Medicaid lines of business in their database so that we could accurately track the RoR. Additionally, marketing and communication policies were updated during 2024 which led to delays in creating and approving Member facing materials.</p>
How were the challenges resolved? <p>RMHP successfully identified the Medicaid Member rewards contact and met with them to receive training on the new process and ensure we had access to all the appropriate reports. Standing meetings were established which also helped to resolve communication barriers.</p>
What successes were demonstrated through the intervention testing? <p>It was a success to not see a decrease in Member participation and RoR with the transition to UHC taking over sending Medicaid Member rewards. In fact, there was an increase in 2023 RoR by 2.57% when compared to 2022. Simplifying the process and reducing administrative tasks asked of the Members may be a contributing factor to the increased rate of participation in this years incentive program.</p>



Appendix A1-1: State of Colorado PIP Intervention Worksheet
Well-Child Visit (WCV) Rates for RMHP CHP+ Members
for Rocky Mountain Health Plan – CHP+



Intervention Status
Select one intervention status: <input type="checkbox"/> Adopt <input type="checkbox"/> Adapt <input type="checkbox"/> Abandon <input checked="" type="checkbox"/> Continue
Rationale for Intervention Status Selected
The rewards program is a great incentive for Members to stay motivated to complete their annual well child visit, exercise, and promote healthy lifestyle choices. RMHP saw an increase in the annual RoR with the migration of the rewards program to UHC. The annual RoR of 9.86% is significantly higher than RMHP's goal of 4%, and an increase of 2.57% when compared to the prior year. For these reasons, RMHP will continue this intervention.



Appendix A1-2: State of Colorado PIP Intervention Worksheet
Well-Child Visit (WCV) Rates for RMHP CHP+ Members
for Rocky Mountain Health Plan – CHP+



Managed Care Organization (MCO) Information	
MCO Name	Rocky Mountain Health Plan – CHP+
PIP Title	<i>Well-Child Visit (WCV) Rates for RMHP CHP+ Members</i>
Intervention Title	Live Agent Member Calls

Appendix A1-2: State of Colorado PIP Intervention Worksheet
Well-Child Visit (WCV) Rates for RMHP CHP+ Members
for Rocky Mountain Health Plan – CHP+

Instructions: Complete a separate worksheet for each intervention.

Intervention Description			
Intervention Title	Live agent Member calls		
What barrier(s) are addressed?	Accessing care which includes establishing and scheduling WCVs with a primary care provider		
Describe how the intervention is culturally and linguistically appropriate.	Live agents can connect with Member services to assist with languages other than English.		
Intervention Process Steps (<i>List the step-by-step process required to carry out this intervention.</i>)	1. Identify eligible population.		
	2. Collaborate with UnitedHealthcare live agent team to ensure call scripts are acceptable for RMHP CHP Members.		
	3. UnitedHealthcare live-agent team conducts calls with identified members.		
	4. UnitedHealthcare live-agent team sends RMHP live-agent data weekly.		
	5. RMHP monitors intervention progress.		
Intervention Start Date	07/01/2023	Intervention End Date	6/30/2024

Appendix A1-2: State of Colorado PIP Intervention Worksheet
Well-Child Visit (WCV) Rates for RMHP CHP+ Members
for Rocky Mountain Health Plan – CHP+

Intervention Effectiveness Measure			
Intervention Effectiveness Measure Title	Live agent Member calls		
Numerator description (narrative)	Count of New or Rescheduled Appointments (Net New Appointments)		
Denominator description (narrative)	Count of Unique Households		
Intervention Evaluation Period Dates (MM/DD/YYYY-MM/DD/YYYY)	Numerator	Denominator	Percentage
07/01/2023-12/31/2023	139	786	17.68%
01/01/2024-6/30/2024	29	447	6.49%
07/01/2024-12/31/2024	TBD	TBD	TBD
01/01/2025-6/31/2025	TBD	TBD	TBD
07/01/2025-12/31/2025	TBD	TBD	TBD
If qualitative data were collected, provide a narrative summary of results below.			
For 2023, there was a 17.68% success rate with assisting Members in scheduling Well Child Visit appointments through the Interactive Voice Response (IVR) outreach. It was identified there was a change with the age group for this outreach from 3-21 to 8-11 years of age. This contributed to the decrease in completion rate of 6.49% during 1/1/24-6/30/24. This issue of including the appropriate age group of 3-21 years of age for this measure outreach has since been identified and corrected with the vendor.			

Appendix A1-2: State of Colorado PIP Intervention Worksheet
Well-Child Visit (WCV) Rates for RMHP CHP+ Members
for Rocky Mountain Health Plan – CHP+

Intervention Evaluation Results
What lessons did the MCO learn from the intervention testing and evaluation results? <p>Members are responsive to IVR outreach to assist in getting scheduled for WCV appointments. Additionally, because this vendor is a UHC Enterprise wide solution it was discovered that plans may be auto enrolled into specific age categories in specific measures. This was the issue that we discovered with our intervention in 2024 (i.e., the Enterprise decided nationally to narrow its focus for all plans to the 8-11 age group and unless plans specifically requested to broaden the age range, the vendor would not include members outside of the narrowed group).</p>
What challenges were encountered? <p>It was identified that the age group for this outreach was changed to 8-11 years of age from the broader 3-21 age range. Well Child Visit is a Common Core Measure paid for with the Common Core budget via the National quality team at UHC. Therefore, the decision was made to narrow the scope for the vendor to the 8-12-year-old age group for the 2024 campaign. We were not aware of this change until much later in our intervention period, however, once made aware we were able to request the change and update the files that were being sent to the vendor.</p>
How were the challenges resolved? <p>RMHP worked with the UHC vendor contact responsible for the intervention to ensure the correct age group of 3-21 are included. We now have a better understanding as to why the entire WCV measure (full age group) was not implemented and this was corrected as of June 2024. For 2024 – CO WCV is for the 3-21 age groups.</p>
What successes were demonstrated through the intervention testing? <p>This has been a successful outreach intervention in closing gaps in care for WCV. This is successful as Members can speak to a live agent who can assist Members real time in scheduling appointments, as opposed to sending a letter and putting more responsibility on the Member to call and schedule an appointment at a later time. Additionally, in the event Members do not have a medical home, the vendor assists them in finding a provider that is open to accepting new patients and assists them in scheduling that appointment as well.</p>



Appendix A1-2: State of Colorado PIP Intervention Worksheet
Well-Child Visit (WCV) Rates for RMHP CHP+ Members
for Rocky Mountain Health Plan – CHP+



Intervention Status
Select one intervention status: <input type="checkbox"/> Adopt <input type="checkbox"/> Adapt <input type="checkbox"/> Abandon <input checked="" type="checkbox"/> Continue
Rationale for Intervention Status Selected
RMHP will continue this intervention as it has shown to be an effective outreach to close gaps in care for WCV by assisting Members scheduling visits.

Appendix A1-3: State of Colorado PIP Intervention Worksheet
Improving the Rate of SDOH Screening for CHP+ Members
for Rocky Mountain Health Plan – CHP+

Managed Care Organization (MCO) Information	
MCO Name	Rocky Mountain Health Plan – CHP+
PIP Title	<i>Improving the Rate of SDOH Screening for CHP+ Members</i>
Intervention Title	Payment for SDOH Screening

Appendix A1-3: State of Colorado PIP Intervention Worksheet
Improving the Rate of SDOH Screening for CHP+ Members
for Rocky Mountain Health Plan – CHP+

Instructions: Complete a separate worksheet for each intervention.

Intervention Description	
Intervention Title	Payment for SDOH Screening
What barrier(s) are addressed?	<ul style="list-style-type: none"> After the Accountable Healthcare Communities Model (AHCM) program ended in 2022, the use of the AHCM tool for screenings generally declined across the region. Providers are less likely to complete routine screenings when they are not reimbursed for the work. There is not a specific code for screening for SDOH linked to reimbursement, like there is with depression screenings. Some providers use Z codes to capture information about their patients' SDOH status, but those are not linked to reimbursement. For that reason, RMHP will rely upon encounter data from our data management partners, rather than setting up a new code, to track screeners eligible for reimbursement.
Describe how the intervention is culturally and linguistically appropriate.	Many of the most vulnerable members identify as being part of a marginalized cultural group, and they experience a higher likelihood of challenges with SDOH like access to food, physical safety, and housing stability. We want to ensure that SDOH impacting these vulnerable individuals' experiences within healthcare and their health outcomes are identified and addressed. We are opening this payment opportunity to both physical and behavioral health providers, recognizing that individuals have a choice where they seek healthcare services.
Intervention Process Steps (List the step-by-step process required to carry out this intervention.)	1. Research the amount currently reimbursed for depression screening and set the rate for SDOH screening.
	2. Create an internal policy and procedure for reimbursing providers for SDOH screening and tracking payments.
	3. Administer payments to providers.

Appendix A1-3: State of Colorado PIP Intervention Worksheet
Improving the Rate of SDOH Screening for CHP+ Members
for Rocky Mountain Health Plan – CHP+

Intervention Description			
	4. Coordinate with data management partners to ensure we are receiving screening results from all eligible providers.		
	5. Offer tailored coaching to providers as needed to improve implementation, leveraging supports within QHN and RMHP's Clinical Quality Improvement department.		
Intervention Start Date (MM/DD/YYYY)	10/31/2023	Intervention End Date (MM/DD/YYYY)	6/30/2024

Appendix A1-3: State of Colorado PIP Intervention Worksheet
Improving the Rate of SDOH Screening for CHP+ Members
for Rocky Mountain Health Plan – CHP+

Intervention Effectiveness Measure			
Intervention Effectiveness Measure Title	SDOH Screening Reimbursements		
Numerator description (narrative)	Number of reimbursed SDOH screenings as identified through encounter data		
Denominator description (narrative)	Total number of all members in CHP+		
Intervention Evaluation Period Dates (MM/DD/YYYY-MM/DD/YYYY)	Numerator	Denominator	Percentage
01/01/2024 – 03/31/2024	Not calculated/TBD	Not calculated/TBD	Not calculated/TBD
04/01/2024 – 06/30/2024	Not calculated/TBD	Not calculated/TBD	Not calculated/TBD
If qualitative data were collected, provide a narrative summary of results below.			
As outlined in the Baseline PIP submission, one of the key interventions to enhance SDOH screening rates involved reimbursing providers for completing screeners. RMHP planned to establish an internal policy and procedure to facilitate this reimbursement and track payments effectively. There was a delay in the establishment of the payment methodology and it did not go into effect until May 1, 2024. According to the payment methodology, reimbursements will be calculated and paid out annually at the end of the calendar year. Therefore, at the time of this Remeasurement Year 1 PIP submission, reimbursements have not yet been calculated or paid out to providers. Payments for SDOH screeners completed in CY2024 will be disbursed in January 2025.			

Appendix A1-3: State of Colorado PIP Intervention Worksheet
Improving the Rate of SDOH Screening for CHP+ Members
for Rocky Mountain Health Plan – CHP+

Intervention Evaluation Results
What lessons did the MCO learn from the intervention testing and evaluation results?
The results for this particular intervention's effectiveness have not been calculated or evaluated at this point, given the timelines of the reimbursement payouts.
What challenges were encountered?
There was a delay in establishing the reimbursement methodology, which was a core intervention in this PIP. This delay was partly due to the need to narrow the scope of the payment methodology based on available resources and considerations of efficiency and sustainability. Additionally, building the infrastructure to capture new Social Determinants of Health (SDOH) screeners through our data management partners' platforms and integrating this data into a reportable tool for RMHP presented further challenges.
How were the challenges resolved?
The challenges were addressed by implementing an annual payment methodology designed with the intention to ensure efficient resource utilization and by developing a sustainable technological infrastructure. Additionally, the team sought to implement strategies that would not put unnecessary burden or timely administrative tasks onto providers in which to capture and send the data elements being requested as part of this design.
What successes were demonstrated through the intervention testing?
The infrastructure to ingest and track new SDOH screeners was built, and the payment methodology was established. Many providers were able to continue their existing workflows for completing SDOH screeners that were established during the AHCM project, which contributed to some success in the screening rates. Additionally, we were able to onboard a handful of new providers whose data had not previously been captured and therefore contributing to the regional performance rate.



Appendix A1-3: State of Colorado PIP Intervention Worksheet
Improving the Rate of SDOH Screening for CHP+ Members
for Rocky Mountain Health Plan – CHP+



Intervention Status
Select one intervention status: <input type="checkbox"/> Adopt <input type="checkbox"/> Adapt <input type="checkbox"/> Abandon <input checked="" type="checkbox"/> Continue
Rationale for Intervention Status Selected
Given the delay in the establishment of RMHP's payment methodology and, simultaneously the building of technological infrastructure to support new SDOH screeners, this intervention has not been fully tested; with the payment methodology and infrastructure now in place, RMHP plans to continue the intervention for this next Remeasurement year.



Appendix A1-4: State of Colorado PIP Intervention Worksheet
Improving the Rate SDOH Screening for CHP+ Members
for Rocky Mountain Health Plan – CHP+



Managed Care Organization (MCO) Information	
MCO Name	Rocky Mountain Health Plan – CHP+
PIP Title	<i>Improving the Rate of SDOH Screening for CHP+ Members</i>
Intervention Title	Provider Coaching

Appendix A1-4: State of Colorado PIP Intervention Worksheet
Improving the Rate SDOH Screening for CHP+ Members
for Rocky Mountain Health Plan – CHP+

Instructions: Complete a separate worksheet for each intervention.

Intervention Description	
Intervention Title	Provider Coaching
What barrier(s) are addressed?	<ul style="list-style-type: none"> Workforce Barriers: Practices are still experiencing significant provider and staff turnover which impacts the ability to adopt and sustain workflows that support SDOH screenings. Clinical Program Managers therefore spend time re-training when and where appropriate. Complex Workflows: Practices report that screening for SDOH and implementing interventions to support patients with identified needs involves complex workflows. Staff require support in knowing how to discuss this effectively and compassionately with patients. Technology Barriers: Data management systems are complex to navigate.
Describe how the intervention is culturally and linguistically appropriate.	RMHP's Quality Improvement Team and our data management partners have long-standing relationships with providers across RAE Region 1, including those from rural and frontier counties. We are familiar with the uniqueness of agricultural communities, and we consistently challenge ourselves to remain sensitive to the concerns and needs of rural communities. This effort also aims to reduce the burden and uncertainty that practices may experience, recognizing the immense amount of burnout that healthcare workers are experiencing.
Intervention Process Steps (<i>List the step-by-step process required to carry out this intervention.</i>)	<ul style="list-style-type: none"> Determine a process for offering support to providers and their staff to support screening for social determinants of health. Consider specific roles for RMHP's Clinical Quality Improvement (CQI) department and our data management partners.
	<ul style="list-style-type: none"> Use data and provider requests to identify providers most in need of tailored coaching support to improve SDOH screening.



Appendix A1-4: State of Colorado PIP Intervention Worksheet
Improving the Rate SDOH Screening for CHP+ Members
for Rocky Mountain Health Plan – CHP+



Intervention Description			
	<ul style="list-style-type: none"> Deliver coaching as needed to our providers and their practices. This is done virtually as well as in-person. 		
Intervention Start Date (MM/DD/YYYY)	1/1/2024	Intervention End Date (MM/DD/YYYY)	6/30/2024

Appendix A1-4: State of Colorado PIP Intervention Worksheet
Improving the Rate SDOH Screening for CHP+ Members
for Rocky Mountain Health Plan – CHP+

Intervention Effectiveness Measure			
Intervention Effectiveness Measure Title	SDOH Screening Rates		
Numerator description (narrative)	Number of unique members with a completed SDOH screener in the measurement period		
Denominator description (narrative)	Number of enrollees in CHP+ during the measurement year who had at least one billed encounter in the measurement period		
Intervention Evaluation Period Dates (MM/DD/YYYY-MM/DD/YYYY)	Numerator	Denominator	Percentage
01/01/2024 – 03/31/2024	51	5,733	0.89%
04/01/2024 – 06/30/2024	89	6,046	1.47%
If qualitative data were collected, provide a narrative summary of results below.			
<p>As a component of our annual tiering process, practices are asked a series of questions related to their competencies and workflows in social determinants of health screening practices. This process occurs each year in March to assess their status and determine a Tier level of 1 through 4. RAE Tier 1 – Tier 3 practices are eligible to earn points as part of the annual tier renewal process by screening patients for SDOH, reviewing the data that is collected from the tool, connecting patients to community resources and ensuring their care plan includes patients' social constraints. This data is reviewed by the practices assigned clinical program manager (CPM). If the practice would like to implement screening workflows, or requests additional resources, the CPM will support their practice in working to develop and implement a SDOH screening process.</p> <p>All Tier 1 – Tier 3 practices, approximately 66% of our practices, receive quarterly meetings to review data and to provide updates. During these meetings practices are also offered support and assistance around SDOH screening by their Clinical Program Manager</p>			

Appendix A1-4: State of Colorado PIP Intervention Worksheet
Improving the Rate SDOH Screening for CHP+ Members
for Rocky Mountain Health Plan – CHP+

Intervention Effectiveness Measure

(CPM). We offer support for workflows and processes related to SDOH screening to all our practices. This coaching is provided ad hoc during in-person or virtual meetings, and we do not track its utilization internally. Practices respond better when they can ask questions and receive support during our visits, rather than scheduling separate meetings. Our support is offered virtually or in-person. We also have a CPM – Behavioral Health team members who meets with practices in-person and virtually as well to offer support around integrated behavioral health. She also provides coaching and support around workflows, processes and resources related to SDOH. We have 80/120 (65%) of our Tier 1 – Tier 3 practices who screen for Sodhi.

All our Tier 1 – Tier 3 practices, approximately 66%, of them complete and submit an annual attestation asking them about their screening process. The following questions are asked:

- Does your practice routinely assess patients' psychosocial needs using a validated screening tool (AHCM, Health Leads, PRAPARE, SEEK, Colorado Children's Hospital Social Needs Tool)
- Does your practice review data collected from a standardized screening tool?
- Does your practice connect patients who screen positive for a social need with community resources?
- Does your practice ensure that care plans created for patients account for patient social constraints, what SDOH screening tool does your practice primarily use?

We are then able to use the data above to then inform practices who are not screening that we are offering reimbursement for SDOH screening as well as discussing the value of screening and offering support. If they are screening, we still offer support to ensure they have a sustainable process.



Appendix A1-4: State of Colorado PIP Intervention Worksheet
Improving the Rate SDOH Screening for CHP+ Members
for Rocky Mountain Health Plan – CHP+



Intervention Evaluation Results
What lessons did the MCO learn from the intervention testing and evaluation results?
Practices require flexibility as it pertains to how data flows and is communicated to the RAE for tracking and triggering payment.
What challenges were encountered?
During the 6-month intervention period the CQI Department experienced the loss of key staff who were responsible for supporting providers and practice coaching. This created a challenge to offering support to providers and their staff for SDOH screening. Some practices are working through technology related barriers that impact the flow of data between their EHR and the RAE. This required some technical assistance by both RMHP and the local Health Information Exchange (QHN) which is how we are leveraging the flow of this data for tracking purposes.
How were the challenges resolved?
Challenges have been resolved as a new key staff member has been hired in the QI Department and is trained to support providers for SDOH screening. RMHP and QHN are collaborating with providers where assistance is needed in establishing data flow processes to capture SDOH screening results.
What successes were demonstrated through the intervention testing?
RMHP worked with both primary care and pediatric practices to stand up new processes with QHN to ensure appropriate flow of SDOH screening results to the RAE. The CQI Department does track data on SDOH screening for all Tier 1 – Tier 3 practices in RAE Region 1. The following questions are asked of practices in RAE Region 1:
2023 Team-based Care: Behavioral Health and Psychosocial Needs

Appendix A1-4: State of Colorado PIP Intervention Worksheet
Improving the Rate SDOH Screening for CHP+ Members
for Rocky Mountain Health Plan – CHP+

Intervention Evaluation Results							
Question	No Response		Yes		No		Total
	Count	Rate	Count	Rate	Count	Rate	Count
Does your practice routinely assess patients' psychosocial needs using a validated screening tool (AHCM, Health Leads, PRAPARE, SEEK, Colorado Children's Hospital Social Needs Tool)?	29	36.25%	38	47.50%	13	16.25%	80
Does your practice review data collected from a standardized screening tool?	30	37.50%	41	51.25%	9	11.25%	80
Does your practice connect patients who screen positive for a social need with community resources?	31	38.75%	45	56.25%	4	5.00%	80
Does your practice ensure that care plans created for patients account for patient social constraints?	32	40.00%	39	48.75%	9	11.25%	80



Appendix A1-4: State of Colorado PIP Intervention Worksheet
Improving the Rate SDOH Screening for CHP+ Members
for Rocky Mountain Health Plan – CHP+



Intervention Status
Select one intervention status: <input type="checkbox"/> Adopt <input type="checkbox"/> Adapt <input type="checkbox"/> Abandon <input checked="" type="checkbox"/> Continue
Rationale for Intervention Status Selected <p>Screening processes in practices are still being implemented across RAE Region 1. While we have seen improvements in overall rates, barriers continue to impact the ability for practices to fully sustain these workflows in an effective and efficient manner. Technical Assistance from Clinical Program Managers is still required to assist with implementing screening processes.</p>

Appendix B. Final PIP Validation Tools

Appendix B contains the final PIP Validation Tools provided by HSAG.



Appendix B: State of Colorado 2024-25 PIP Validation Tool
Well-Child Visits (WCV) Rates for RMHP CHP+ Members
for Rocky Mountain Health Plan - CHP+



Demographic Information			
MCO Name:	Rocky Mountain Health Plan - CHP+		
Project Leader Name:	Kim Herek	Title:	Quality Improvement Director
Telephone Number:	402-917-1833	Email Address:	Kimberly.herek@uhc.com
PIP Title:	Well-Child Visits (WCV) Rates for RMHP CHP+ Members		
Submission Date:	October 31, 2024		
Resubmission Date:	December 20, 2024		

Appendix B: State of Colorado 2024-25 PIP Validation Tool
Well-Child Visits (WCV) Rates for RMHP CHP+ Members
for Rocky Mountain Health Plan - CHP+

Evaluation Elements	Critical	Scoring	Comments/Recommendations
Performance Improvement Project Validation			
Step 1. Review the Selected PIP Topic: The PIP topic should be selected based on data that identify an opportunity for improvement. The goal of the project should be to improve member health, functional status, and/or satisfaction. The topic may also be required by the State. The PIP topic:			
1. Was selected following collection and analysis of data. N/A is not applicable to this element for scoring.	C*	Met	
Results for Step 1			
Total Evaluation Elements**	1	1	Critical Elements***
Met	1	1	Met
Partially Met	0	0	Partially Met
Not Met	0	0	Not Met
N/A (Not Applicable)	0	0	N/A (Not Applicable)
<p>* "C" in this column denotes a critical evaluation element.</p> <p>** This is the total number of all evaluation elements for this step.</p> <p>*** This is the total number of critical evaluation elements for this step.</p>			

Appendix B: State of Colorado 2024-25 PIP Validation Tool
Well-Child Visits (WCV) Rates for RMHP CHP+ Members
for Rocky Mountain Health Plan - CHP+

Evaluation Elements	Critical	Scoring	Comments/Recommendations
Performance Improvement Project Validation			
Step 2. Review the PIP Aim Statement(s): Defining the statement(s) helps maintain the focus of the PIP and sets the framework for data collection, analysis, and interpretation. The statement:			
1. Stated the area in need of improvement in clear, concise, and measurable terms. N/A is not applicable to this element for scoring.	C*	Met	General Feedback: The health plan specified "leveraging member rewards programs and primary care provider value-based contract requirements" in the Aim statement. HSAG recommends using more general language such as, "targeted interventions" in the Aim statement to allow for interventions to be determined and revised throughout the duration of the PIP. If the health plan decides to use a different type of intervention, the Aim statement may need to be revised for future submissions.
Results for Step 2			
Total Evaluation Elements**	1	1	Critical Elements***
Met	1	1	Met
Partially Met	0	0	Partially Met
Not Met	0	0	Not Met
N/A (Not Applicable)	0	0	N/A (Not Applicable)
<p>* "C" in this column denotes a critical evaluation element.</p> <p>** This is the total number of all evaluation elements for this step.</p> <p>*** This is the total number of critical evaluation elements for this step.</p>			

Appendix B: State of Colorado 2024-25 PIP Validation Tool
Well-Child Visits (WCV) Rates for RMHP CHP+ Members
for Rocky Mountain Health Plan - CHP+

Evaluation Elements	Critical	Scoring	Comments/Recommendations
Performance Improvement Project Validation			
Step 3. Review the Identified PIP Population: The PIP population should be clearly defined to represent the population to which the PIP Aim statement and indicator(s) apply, without excluding members with special healthcare needs. The PIP population:			
1. Was accurately and completely defined and captured all members to whom the PIP Aim statement(s) applied. N/A is not applicable to this element for scoring.	C*	Met	
Results for Step 3			
Total Evaluation Elements**	1	1	Critical Elements***
Met	1	1	Met
Partially Met	0	0	Partially Met
Not Met	0	0	Not Met
N/A (Not Applicable)	0	0	N/A (Not Applicable)
<p>* "C" in this column denotes a critical evaluation element.</p> <p>** This is the total number of all evaluation elements for this step.</p> <p>*** This is the total number of critical evaluation elements for this step.</p>			

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Well-Child Visits (WCV) Rates for RMHP CHP+ Members
for Rocky Mountain Health Plan - CHP+

Evaluation Elements	Critical	Scoring	Comments/Recommendations
Performance Improvement Project Validation			
Step 4. Review the Sampling Method: (If sampling was not used, each evaluation element will be scored <i>Not Applicable [N/A]</i>). If sampling was used to select members in the population, proper sampling methods are necessary to provide valid and reliable results. Sampling methods:			
1. Included the sampling frame size for each indicator.		N/A	
2. Included the sample size for each indicator.	C*	N/A	
3. Included the margin of error and confidence level for each indicator.		N/A	
4. Described the method used to select the sample.		N/A	
5. Allowed for the generalization of results to the population.	C*	N/A	
Results for Step 4			
Total Evaluation Elements**	5	2	Critical Elements***
<i>Met</i>	0	0	<i>Met</i>
<i>Partially Met</i>	0	0	<i>Partially Met</i>
<i>Not Met</i>	0	0	<i>Not Met</i>
<i>N/A (Not Applicable)</i>	5	2	<i>N/A (Not Applicable)</i>
* "C" in this column denotes a critical evaluation element. ** This is the total number of all evaluation elements for this step. *** This is the total number of critical evaluation elements for this step.			

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Well-Child Visits (WCV) Rates for RMHP CHP+ Members
for Rocky Mountain Health Plan - CHP+

Evaluation Elements	Critical	Scoring	Comments/Recommendations
Performance Improvement Project Validation			
Step 5. Review the Selected Performance Indicator(s): A performance indicator is a quantitative or qualitative characteristic or variable that reflects a discrete event or a status that is to be measured. The selected indicator(s) should track performance or improvement over time. The indicator(s) should be objective, clearly and unambiguously defined, and based on current clinical knowledge or health services research. The indicator(s) of performance:			
1. Were well-defined, objective, and measured changes in health or functional status, member satisfaction, or valid process alternatives.	C*	Met	
2. Included the basis on which the indicator(s) was developed, if internally developed.		N/A	
Results for Step 5			
Total Evaluation Elements**	2	1	Critical Elements***
Met	1	1	Met
Partially Met	0	0	Partially Met
Not Met	0	0	Not Met
N/A (Not Applicable)	1	0	N/A (Not Applicable)
<p>* "C" in this column denotes a critical evaluation element.</p> <p>** This is the total number of all evaluation elements for this step.</p> <p>*** This is the total number of critical evaluation elements for this step.</p>			

Appendix B: State of Colorado 2024-25 PIP Validation Tool
Well-Child Visits (WCV) Rates for RMHP CHP+ Members
for Rocky Mountain Health Plan - CHP+

Evaluation Elements	Critical	Scoring	Comments/Recommendations
Performance Improvement Project Validation			
Step 6. Review the Data Collection Procedures: The data collection process must ensure that the data collected on the indicator(s) were valid and reliable. Validity is an indication of the accuracy of the information obtained. Reliability is an indication of the repeatability or reproducibility of a measurement. Data collection procedures included:			
1. Clearly defined sources of data and data elements collected for the indicator(s). <i>N/A is not applicable to this element for scoring.</i>		<i>Met</i>	
2. A clearly defined and systematic process for collecting baseline and remeasurement data for the indicator(s). <i>N/A is not applicable to this element for scoring.</i>	C*	<i>Met</i>	
3. A manual data collection tool that ensured consistent and accurate collection of data according to indicator specifications.	C*	<i>N/A</i>	
4. The percentage of reported administrative data completeness at the time the data are generated, and the process used to calculate the percentage.		<i>Met</i>	
Results for Step 6			
Total Evaluation Elements**	4	2	Critical Elements***
<i>Met</i>	3	1	<i>Met</i>
<i>Partially Met</i>	0	0	<i>Partially Met</i>
<i>Not Met</i>	0	0	<i>Not Met</i>
<i>N/A (Not Applicable)</i>	1	1	<i>N/A (Not Applicable)</i>
* "C" in this column denotes a critical evaluation element. ** This is the total number of all evaluation elements for this step. *** This is the total number of critical evaluation elements for this step.			



Appendix B: State of Colorado 2024-25 PIP Validation Tool
Well-Child Visits (WCV) Rates for RMHP CHP+ Members
for Rocky Mountain Health Plan - CHP+



Results for Step 1 - 6			
Total Evaluation Elements	14	8	Critical Elements
<i>Met</i>	7	5	<i>Met</i>
<i>Partially Met</i>	0	0	<i>Partially Met</i>
<i>Not Met</i>	0	0	<i>Not Met</i>
<i>N/A (Not Applicable)</i>	7	3	<i>N/A (Not Applicable)</i>

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Well-Child Visits (WCV) Rates for RMHP CHP+ Members
for Rocky Mountain Health Plan - CHP+

Evaluation Elements	Critical	Scoring	Comments/Recommendations
Performance Improvement Project Validation			
Step 7. Review Data Analysis and Interpretation of Results: Clearly present the results for each indicator. Describe the data analysis performed, the results of the statistical analysis, and a narrative interpretation for each indicator. Through data analysis and interpretation, real improvement, as well as sustained improvement, can be determined. The data analysis and interpretation of the indicator outcomes:			
1. Included accurate, clear, consistent, and easily understood information in the data table.	C*	Partially Met	The health plan reported accurate baseline and Remeasurement 1 indicator data; however, the health plan reported statistical testing results for Remeasurement 1 based on a t-test. The health plan should re-calculate statistical testing results using an appropriate two-tailed statistical test (Fisher's exact or Chi-square test) for comparing the remeasurement results to the baseline indicator results and update the statistical testing documentation in Step 7. Using a two-tailed Chi-square test with Yates correction to compare Remeasurement 1 to baseline, HSAG calculated $p = 0.0001$. Resubmission January 2025: The health plan revised the statistical testing results reported for Remeasurement 1; however, the results were incorrect. HSAG was unable to replicate the reported p value using the reported numerator and denominator values. Using the updated Remeasurement 1 data and the Chi-square test without Yates correction, HSAG calculated a Chi-square value of 17.01 and a p value less than 0.0001. The validation score for this evaluation element remains <i>Partially Met</i> . The health plan should correct the statistical testing results, seeking technical assistance if needed, prior to next year's annual PIP submission.
2. Included a narrative interpretation of results that addressed all requirements.		Met	General Feedback: Regarding the anticipated Remeasurement 1 data update, the health plan should update the Remeasurement 1 indicator results prior to the resubmission due date (1/22/2025), if possible, so that updated indicator results can be included for this year's validation. The health plan must also update the statistical testing results to align with the updated data for each indicator. Resubmission January 2025: The health plan updated the Remeasurement 1 results and addressed the General Feedback.
3. Addressed factors that threatened the validity of the data reported and ability to compare the initial measurement with the remeasurement.		Met	



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Results for Step 7			
Total Evaluation Elements**	3	1	Critical Elements***
<i>Met</i>	2	0	<i>Met</i>
<i>Partially Met</i>	1	1	<i>Partially Met</i>
<i>Not Met</i>	0	0	<i>Not Met</i>
<i>N/A (Not Applicable)</i>	0	0	<i>N/A (Not Applicable)</i>

* "C" in this column denotes a critical evaluation element.
 ** This is the total number of all evaluation elements for this step.
 *** This is the total number of critical evaluation elements for this step.

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Well-Child Visits (WCV) Rates for RMHP CHP+ Members
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Evaluation Elements	Critical	Scoring	Comments/Recommendations
Performance Improvement Project Validation			
Step 8. Assess the Improvement Strategies: Interventions were developed to address causes/barriers identified through a continuous cycle of data measurement and data analysis. The improvement strategies were developed from an ongoing quality improvement process that included:			
1. A causal/barrier analysis with a clearly documented team, process/steps, and quality improvement tools.	C*	Met	
2. Interventions that were logically linked to identified barriers and have the potential to impact indicator outcomes.	C*	Met	
3. Interventions that were implemented in a timely manner to allow for impact of indicator outcomes.		Met	
4. An evaluation of effectiveness for each individual intervention.	C*	Met	General Feedback: To optimize improvement in overall indicator results, the health plan should consider testing interventions for the shortest time necessary to collect meaningful effectiveness measure data and determine next steps. If a decision to adopt, adapt, or abandon can be made in three months or less, the health plan should decide on next steps and adapt the intervention or start a new intervention.
5. Interventions that were adopted, adapted, abandoned, or continued based on evaluation data.		Met	
Results for Step 8			
Total Elements**	5	3	Critical Elements***
Met	5	3	Met
Partially Met	0	0	Partially Met
Not Met	0	0	Not Met
N/A (Not Applicable)	0	0	N/A (Not Applicable)
<p>* "C" in this column denotes a critical evaluation element.</p> <p>** This is the total number of all evaluation elements for this step.</p> <p>*** This is the total number of critical evaluation elements for this step.</p>			



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Results for Step 7 - 8			
Total Evaluation Elements	8	4	Critical Elements
<i>Met</i>	7	3	<i>Met</i>
<i>Partially Met</i>	1	1	<i>Partially Met</i>
<i>Not Met</i>	0	0	<i>Not Met</i>
<i>N/A (Not Applicable)</i>	0	0	<i>N/A (Not Applicable)</i>

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Well-Child Visits (WCV) Rates for RMHP CHP+ Members
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Evaluation Elements	Critical	Scoring	Comments/Recommendations
Performance Improvement Project Validation			
Step 9. Assess the likelihood that Significant and Sustained Improvement Occurred: Improvement in performance is evaluated based on evidence that there was improvement over baseline indicator performance. Sustained improvement is assessed after improvement over baseline indicator performance has been demonstrated. Sustained improvement is achieved when repeated measurements over comparable time periods demonstrate continued improvement over baseline indicator performance.			
1. The remeasurement methodology was the same as the baseline methodology.	C*	Met	
2. There was improvement over baseline performance across all performance indicators.		Met	
3. There was statistically significant improvement (95 percent confidence level, $p < 0.05$) over the baseline across all performance indicators.		Met	
4. Sustained statistically significant improvement over baseline indicator performance across all indicators was demonstrated through repeated measurements over comparable time periods.		Not Assessed	Sustained improvement is not assessed until statistically significant improvement is demonstrated and remeasurement results are reported for a subsequent remeasurement period.
Results for Step 9			
Total Evaluation Elements**	4	1	Critical Elements***
Met	3	1	Met
Partially Met	0	0	Partially Met
Not Met	0	0	Not Met
N/A (Not Applicable)	0	0	N/A (Not Applicable)
<p>* "C" in this column denotes a critical evaluation element.</p> <p>** This is the total number of all evaluation elements for this step.</p> <p>*** This is the total number of critical evaluation elements for this step.</p>			

Appendix B: State of Colorado 2024-25 PIP Validation Tool
Well-Child Visits (WCV) Rates for RMHP CHP+ Members
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Table B—1 2024-25 PIP Validation Tool Scores for Well-Child Visits Rates for RMHP CHP+ Members for Rocky Mountain Health Plan - CHP+										
Review Step	Total Possible Evaluation Elements (Including Critical Elements)	Total Met	Total Partially Met	Total Not Met	Total N/A	Total Possible Critical Elements	Total Critical Elements Met	Total Critical Elements Partially Met	Total Critical Elements Not Met	Total Critical Elements N/A
1. Review the Selected PIP Topic	1	1	0	0	0	1	1	0	0	0
2. Review the PIP Aim Statement(s)	1	1	0	0	0	1	1	0	0	0
3. Review the Identified PIP Population	1	1	0	0	0	1	1	0	0	0
4. Review the Sampling Method	5	0	0	0	5	2	0	0	0	2
5. Review the Selected Performance Indicator(s)	2	1	0	0	1	1	1	0	0	0
6. Review the Data Collection Procedures	4	3	0	0	1	2	1	0	0	1
7. Review Data Analysis and Interpretation of Results	3	2	1	0	0	1	0	1	0	0
8. Assess the Improvement Strategies	5	5	0	0	0	3	3	0	0	0
9. Assess the Likelihood that Significant and Sustained Improvement Occurred	4	3	0	0	0	1	1	0	0	0
Totals for All Steps	26	17	1	0	7	13	9	1	0	3

Table B—2 2024-25 Overall Confidence of Adherence to Acceptable Methodology for All Phases of the PIP (Step 1 through Step 8) for Well-Child Visits Rates for RMHP CHP+ Members for Rocky Mountain Health Plan - CHP+	
Percentage Score of Evaluation Elements Met*	93%
Percentage Score of Critical Elements Met**	89%
Confidence Level***	Low Confidence

Table B—3 2024-25 Overall Confidence That the PIP Achieved Significant Improvement (Step 9) for Well-Child Visits Rates for RMHP CHP+ Members for Rocky Mountain Health Plan - CHP+	
Percentage Score of Evaluation Elements Met*	100%
Percentage Score of Critical Elements Met**	100%
Confidence Level***	High Confidence

The *Not Assessed* and *Not Applicable* scores have been removed from the scoring calculations.

* The percentage score of evaluation elements *Met* is calculated by dividing the total number *Met* by the sum of all evaluation elements *Met*, *Partially Met*, and *Not Met*.

** The percentage score of critical elements *Met* is calculated by dividing the total critical elements *Met* by the sum of the critical elements *Met*, *Partially Met*, and *Not Met*.

*** Confidence Level: See confidence level definitions on next page.



Appendix B: State of Colorado 2024-25 PIP Validation Tool
Well-Child Visits (WCV) Rates for RMHP CHP+ Members
for Rocky Mountain Health Plan - CHP+



EVALUATION OF THE OVERALL VALIDITY AND RELIABILITY OF PIP RESULTS

HSAG assessed the MCO's PIP based on CMS Protocol 1 to determine whether the MCO adhered to an acceptable methodology for all phases of design and data collection, and conducted accurate data analysis and interpretation of PIP results. HSAG's validation of the PIP determined the following:

High Confidence:	High confidence in reported PIP results. All critical evaluation elements were <i>Met</i> , and 90 percent to 100 percent of all evaluation elements were <i>Met</i> across all steps.
Moderate Confidence:	Moderate confidence in reported PIP results. All critical evaluation elements were <i>Met</i> , and 80 percent to 89 percent of all evaluation elements were <i>Met</i> across all steps.
Low Confidence:	Low confidence in reported PIP results. Across all steps, 65 percent to 79 percent of all evaluation elements were <i>Met</i> ; or one or more critical evaluation elements were <i>Partially Met</i> .
No Confidence:	No confidence in reported PIP results. Across all steps, less than 65 percent of all evaluation elements were <i>Met</i> ; or one or more critical evaluation elements were <i>Not Met</i> .

Confidence Level for Acceptable Methodology: *Low Confidence*

HSAG assessed the MCO's PIP based on CMS Protocol 1 and determined whether the MCO produced evidence of significant improvement. HSAG's validation of the PIP determined the following:

High Confidence:	All performance indicators demonstrated <i>statistically significant</i> improvement over the baseline.
Moderate Confidence:	To receive <i>Moderate Confidence</i> for significant improvement, one of the three scenarios below occurred: <ol style="list-style-type: none"> 1. All performance indicators demonstrated improvement over the baseline, and some but not all performance indicators demonstrated <i>statistically significant</i> improvement over the baseline. 2. All performance indicators demonstrated improvement over the baseline, and none of the performance indicators demonstrated <i>statistically significant</i> improvement over the baseline. 3. Some but not all performance indicators demonstrated improvement over baseline, and some but not all performance indicators demonstrated <i>statistically significant</i> improvement over baseline.
Low Confidence:	The remeasurement methodology was not the same as the baseline methodology for at least one performance indicator or some but not all performance indicators demonstrated improvement over the baseline and none of the performance indicators demonstrated <i>statistically significant</i> improvement over the baseline.
No Confidence:	The remeasurement methodology was not the same as the baseline methodology for all performance indicators or none of the performance indicators demonstrated improvement over the baseline.

Confidence Level for Significant Improvement: *High Confidence*



Appendix B: State of Colorado 2024-25 PIP Validation Tool
Improving the Rate of SDOH Screening for CHP+ Members
for Rocky Mountain Health Plan - CHP+



Demographic Information			
MCO Name:	Rocky Mountain Health Plan - CHP+		
Project Leader Name:	Kimberly Herek	Title:	Director of Quality Improvement
Telephone Number:	Not Applicable	Email Address:	Kimberly.Herek@uhc.com
PIP Title:	Improving the Rate of Social Determinants of Health (SDOH) Screening for CHP+ Members		
Submission Date:	October 31, 2024		
Resubmission Date:	December 20, 2024		

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Evaluation Elements	Critical	Scoring	Comments/Recommendations
Performance Improvement Project Validation			
Step 1. Review the Selected PIP Topic: The PIP topic should be selected based on data that identify an opportunity for improvement. The goal of the project should be to improve member health, functional status, and/or satisfaction. The topic may also be required by the State. The PIP topic:			
1. Was selected following collection and analysis of data. N/A is not applicable to this element for scoring.	C*	Met	
Results for Step 1			
Total Evaluation Elements**	1	1	Critical Elements***
Met	1	1	Met
Partially Met	0	0	Partially Met
Not Met	0	0	Not Met
N/A (Not Applicable)	0	0	N/A (Not Applicable)
<p>* "C" in this column denotes a critical evaluation element.</p> <p>** This is the total number of all evaluation elements for this step.</p> <p>*** This is the total number of critical evaluation elements for this step.</p>			

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Evaluation Elements	Critical	Scoring	Comments/Recommendations
Performance Improvement Project Validation			
Step 2. Review the PIP Aim Statement(s): Defining the statement(s) helps maintain the focus of the PIP and sets the framework for data collection, analysis, and interpretation. The statement:			
1. Stated the area in need of improvement in clear, concise, and measurable terms. <i>N/A</i> is not applicable to this element for scoring.	C*	Met	
Results for Step 2			
Total Evaluation Elements**	1	1	Critical Elements***
<i>Met</i>	1	1	<i>Met</i>
<i>Partially Met</i>	0	0	<i>Partially Met</i>
<i>Not Met</i>	0	0	<i>Not Met</i>
<i>N/A (Not Applicable)</i>	0	0	<i>N/A (Not Applicable)</i>
<p>* "C" in this column denotes a critical evaluation element.</p> <p>** This is the total number of all evaluation elements for this step.</p> <p>*** This is the total number of critical evaluation elements for this step.</p>			

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Evaluation Elements	Critical	Scoring	Comments/Recommendations
Performance Improvement Project Validation			
Step 3. Review the Identified PIP Population: The PIP population should be clearly defined to represent the population to which the PIP Aim statement and indicator(s) apply, without excluding members with special healthcare needs. The PIP population:			
1. Was accurately and completely defined and captured all members to whom the PIP Aim statement(s) applied. <i>N/A is not applicable to this element for scoring.</i>	C*	Met	
Results for Step 3			
Total Evaluation Elements**	1	1	Critical Elements***
<i>Met</i>	1	1	<i>Met</i>
<i>Partially Met</i>	0	0	<i>Partially Met</i>
<i>Not Met</i>	0	0	<i>Not Met</i>
<i>N/A (Not Applicable)</i>	0	0	<i>N/A (Not Applicable)</i>
<p>* "C" in this column denotes a critical evaluation element.</p> <p>** This is the total number of all evaluation elements for this step.</p> <p>*** This is the total number of critical evaluation elements for this step.</p>			

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Improving the Rate of SDOH Screening for CHP+ Members
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Evaluation Elements	Critical	Scoring	Comments/Recommendations
Performance Improvement Project Validation			
Step 4. Review the Sampling Method: (If sampling was not used, each evaluation element will be scored <i>Not Applicable [N/A]</i>). If sampling was used to select members in the population, proper sampling methods are necessary to provide valid and reliable results. Sampling methods:			
1. Included the sampling frame size for each indicator.		N/A	
2. Included the sample size for each indicator.	C*	N/A	
3. Included the margin of error and confidence level for each indicator.		N/A	
4. Described the method used to select the sample.		N/A	
5. Allowed for the generalization of results to the population.	C*	N/A	
Results for Step 4			
Total Evaluation Elements**	5	2	Critical Elements***
<i>Met</i>	0	0	<i>Met</i>
<i>Partially Met</i>	0	0	<i>Partially Met</i>
<i>Not Met</i>	0	0	<i>Not Met</i>
<i>N/A (Not Applicable)</i>	5	2	<i>N/A (Not Applicable)</i>
<p>* "C" in this column denotes a critical evaluation element.</p> <p>** This is the total number of all evaluation elements for this step.</p> <p>*** This is the total number of critical evaluation elements for this step.</p>			

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Evaluation Elements	Critical	Scoring	Comments/Recommendations
Performance Improvement Project Validation			
Step 5. Review the Selected Performance Indicator(s): A performance indicator is a quantitative or qualitative characteristic or variable that reflects a discrete event or a status that is to be measured. The selected indicator(s) should track performance or improvement over time. The indicator(s) should be objective, clearly and unambiguously defined, and based on current clinical knowledge or health services research. The indicator(s) of performance:			
1. Were well-defined, objective, and measured changes in health or functional status, member satisfaction, or valid process alternatives.	C*	Met	
2. Included the basis on which the indicator(s) was developed, if internally developed.		Met	
Results for Step 5			
Total Evaluation Elements**	2	1	Critical Elements***
Met	2	1	Met
Partially Met	0	0	Partially Met
Not Met	0	0	Not Met
N/A (Not Applicable)	0	0	N/A (Not Applicable)
* "C" in this column denotes a critical evaluation element.			
** This is the total number of all evaluation elements for this step.			
*** This is the total number of critical evaluation elements for this step.			

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Evaluation Elements	Critical	Scoring	Comments/Recommendations
Performance Improvement Project Validation			
Step 6. Review the Data Collection Procedures: The data collection process must ensure that the data collected on the indicator(s) were valid and reliable. Validity is an indication of the accuracy of the information obtained. Reliability is an indication of the repeatability or reproducibility of a measurement. Data collection procedures included:			
1. Clearly defined sources of data and data elements collected for the indicator(s). <i>N/A is not applicable to this element for scoring.</i>		<i>Met</i>	
2. A clearly defined and systematic process for collecting baseline and remeasurement data for the indicator(s). <i>N/A is not applicable to this element for scoring.</i>	C*	<i>Met</i>	
3. A manual data collection tool that ensured consistent and accurate collection of data according to indicator specifications.	C*	<i>N/A</i>	
4. The percentage of reported administrative data completeness at the time the data are generated, and the process used to calculate the percentage.		<i>Met</i>	
Results for Step 6			
Total Evaluation Elements**	4	2	Critical Elements***
<i>Met</i>	3	1	<i>Met</i>
<i>Partially Met</i>	0	0	<i>Partially Met</i>
<i>Not Met</i>	0	0	<i>Not Met</i>
<i>N/A (Not Applicable)</i>	1	1	<i>N/A (Not Applicable)</i>
<p>* "C" in this column denotes a critical evaluation element.</p> <p>** This is the total number of all evaluation elements for this step.</p> <p>*** This is the total number of critical evaluation elements for this step.</p>			



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Results for Step 1 - 6			
Total Evaluation Elements	14	8	Critical Elements
<i>Met</i>	8	5	<i>Met</i>
<i>Partially Met</i>	0	0	<i>Partially Met</i>
<i>Not Met</i>	0	0	<i>Not Met</i>
<i>N/A (Not Applicable)</i>	6	3	<i>N/A (Not Applicable)</i>

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Evaluation Elements	Critical	Scoring	Comments/Recommendations
Performance Improvement Project Validation			
Step 7. Review Data Analysis and Interpretation of Results: Clearly present the results for each indicator. Describe the data analysis performed, the results of the statistical analysis, and a narrative interpretation for each indicator. Through data analysis and interpretation, real improvement, as well as sustained improvement, can be determined. The data analysis and interpretation of the indicator outcomes:			
1. Included accurate, clear, consistent, and easily understood information in the data table.	C*	Partially Met	<p>The health plan reported accurate baseline and Remeasurement 1 numerators, denominators, and percentages; however, the health plan reported statistical testing results for Remeasurement 1 based on a t-test. The health plan should re-calculate and report results from an appropriate two-tailed statistical test (Fisher's exact or Chi-square test) for comparing the remeasurement results to baseline indicator results. Using a two-tailed Chi-square test with Yates correction to compare Remeasurement 1 to baseline, HSAG calculated a p value of 0.4256.</p> <p>Resubmission January 2025: The health plan revised the statistical testing results reported in for Remeasurement 1; however, the results were incorrect. HSAG was unable to replicate the reported Chi-square value and p value using the reported numerator and denominator values. The validation score for this evaluation element remains <i>Partially Met</i>. The health plan should correct the Remeasurement 1 statistical testing results, seeking technical assistance if needed, prior to next year's annual PIP submission.</p>
2. Included a narrative interpretation of results that addressed all requirements.		Partially Met	<p>The health plan should revise the Baseline to Remeasurement 1 Narrative after re-calculating the comparison of Remeasurement 1 to baseline results using an appropriate two-tailed statistical test (Fisher's exact or Chi-square test), as noted in the feedback for Evaluation Element 1, above. In addition, when describing the difference between the baseline and Remeasurement 1 indicator rates, the correct units is percentage points, rather than percent.</p> <p>Resubmission January 2025: The health plan revised the statistical testing results reported in the Remeasurement 1 Narrative; however, the results were incorrect. HSAG was unable to replicate the reported Chi square value and p value using the reported numerator and denominator values. The validation score for this evaluation element remains <i>Partially Met</i>. The health plan should correct the statistical testing results in the Baseline to Remeasurement 1 Narrative prior to next year's annual PIP submission.</p>
3. Addressed factors that threatened the validity of the data reported and ability to compare the initial measurement with the remeasurement.		Met	

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Results for Step 7			
Total Evaluation Elements**	3	1	Critical Elements***
<i>Met</i>	1	0	<i>Met</i>
<i>Partially Met</i>	2	1	<i>Partially Met</i>
<i>Not Met</i>	0	0	<i>Not Met</i>
<i>N/A (Not Applicable)</i>	0	0	<i>N/A (Not Applicable)</i>

* "C" in this column denotes a critical evaluation element.
 ** This is the total number of all evaluation elements for this step.
 *** This is the total number of critical evaluation elements for this step.

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Evaluation Elements	Critical	Scoring	Comments/Recommendations
Performance Improvement Project Validation			
Step 8. Assess the Improvement Strategies: Interventions were developed to address causes/barriers identified through a continuous cycle of data measurement and data analysis. The improvement strategies were developed from an ongoing quality improvement process that included:			
1. A causal/barrier analysis with a clearly documented team, process/steps, and quality improvement tools.	C*	Met	
2. Interventions that were logically linked to identified barriers and have the potential to impact indicator outcomes.	C*	Met	
3. Interventions that were implemented in a timely manner to allow for impact of indicator outcomes.		Met	
4. An evaluation of effectiveness for each individual intervention.	C*	Met	<p>HSAG identified the following opportunities for improvement:</p> <ul style="list-style-type: none"> •For the Provider Coaching intervention, the health plan should include more detail in the intervention process steps to illustrate the content of provider coaching and how coaching was delivered (one-on-one versus group; in-person, virtual, phone call, etc.) •For the Provider Coaching intervention, the health plan reported quarterly data for the overall performance indicator for the Intervention Effectiveness Measure. The Intervention Effectiveness Measure should be specific to the intervention. The health plan should report data specific to the provider coaching activities that occurred from 1/1/2024 through 6/30/2024. For example, the percentage of providers targeted for coaching who were successfully reached and received coaching and/or the percentage of members assigned to providers who received coaching who completed a SDOH screening. •In addition, for the Provider Payments intervention, the health plan should consider collecting more real-time, process-level intervention effectiveness data to support timely decisions about adopting, adapting, or abandoning interventions to support overall improvement in performance indicator results. <p>Resubmission January 2025: The health plan revised the intervention worksheet documentation and addressed the initial feedback. The validation score for this evaluation element has been changed to <i>Met</i>.</p>
5. Interventions that were adopted, adapted, abandoned, or continued based on evaluation data.		Met	



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Results for Step 8			
Total Elements**	5	3	Critical Elements***
<i>Met</i>	5	3	<i>Met</i>
<i>Partially Met</i>	0	0	<i>Partially Met</i>
<i>Not Met</i>	0	0	<i>Not Met</i>
<i>N/A (Not Applicable)</i>	0	0	<i>N/A (Not Applicable)</i>
<p>* "C" in this column denotes a critical evaluation element. ** This is the total number of all evaluation elements for this step. *** This is the total number of critical evaluation elements for this step.</p>			



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Results for Step 7 - 8			
Total Evaluation Elements	8	4	Critical Elements
<i>Met</i>	6	3	<i>Met</i>
<i>Partially Met</i>	2	1	<i>Partially Met</i>
<i>Not Met</i>	0	0	<i>Not Met</i>
<i>N/A (Not Applicable)</i>	0	0	<i>N/A (Not Applicable)</i>

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Evaluation Elements	Critical	Scoring	Comments/Recommendations
Performance Improvement Project Validation			
Step 9. Assess the likelihood that Significant and Sustained Improvement Occurred: Improvement in performance is evaluated based on evidence that there was improvement over baseline indicator performance. Sustained improvement is assessed after improvement over baseline indicator performance has been demonstrated. Sustained improvement is achieved when repeated measurements over comparable time periods demonstrate continued improvement over baseline indicator performance.			
1. The remeasurement methodology was the same as the baseline methodology.	C*	Met	
2. There was improvement over baseline performance across all performance indicators.		Met	
3. There was statistically significant improvement (95 percent confidence level, $p < 0.05$) over the baseline across all performance indicators.		Not Met	Using the health plan's reported numerators and denominators, HSAG determined that the improvement in indicator results from baseline to Remeasurement 1 was not statistically significant. Resubmission January 2025: The performance indicator results remained the same; therefore, the validation score for this evaluation element remains <i>Not Met</i> .
4. Sustained statistically significant improvement over baseline indicator performance across all indicators was demonstrated through repeated measurements over comparable time periods.		Not Assessed	Sustained improvement is not assessed until statistically significant improvement is demonstrated and remeasurement results are reported for a subsequent remeasurement period.
Results for Step 9			
Total Evaluation Elements**	4	1	Critical Elements***
<i>Met</i>	2	1	<i>Met</i>
<i>Partially Met</i>	0	0	<i>Partially Met</i>
<i>Not Met</i>	1	0	<i>Not Met</i>
<i>N/A (Not Applicable)</i>	0	0	<i>N/A (Not Applicable)</i>
<p>* "C" in this column denotes a critical evaluation element.</p> <p>** This is the total number of all evaluation elements for this step.</p> <p>*** This is the total number of critical evaluation elements for this step.</p>			

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Table B—1 2024-25 PIP Validation Tool Scores for Improving the Rate of SDOH Screening for CHP+ Members for Rocky Mountain Health Plan - CHP+										
Review Step	Total Possible Evaluation Elements (Including Critical Elements)	Total Met	Total Partially Met	Total Not Met	Total N/A	Total Possible Critical Elements	Total Critical Elements Met	Total Critical Elements Partially Met	Total Critical Elements Not Met	Total Critical Elements N/A
1. Review the Selected PIP Topic	1	1	0	0	0	1	1	0	0	0
2. Review the PIP Aim Statement(s)	1	1	0	0	0	1	1	0	0	0
3. Review the Identified PIP Population	1	1	0	0	0	1	1	0	0	0
4. Review the Sampling Method	5	0	0	0	5	2	0	0	0	2
5. Review the Selected Performance Indicator(s)	2	2	0	0	0	1	1	0	0	0
6. Review the Data Collection Procedures	4	3	0	0	1	2	1	0	0	1
7. Review Data Analysis and Interpretation of Results	3	1	2	0	0	1	0	1	0	0
8. Assess the Improvement Strategies	5	5	0	0	0	3	3	0	0	0
9. Assess the Likelihood that Significant and Sustained Improvement Occurred	4	2	0	1	0	1	1	0	0	0
Totals for All Steps	26	16	2	1	6	13	9	1	0	3

Table B—2 2024-25 Overall Confidence of Adherence to Acceptable Methodology for All Phases of the PIP (Step 1 through Step 8) for Improving the Rate of SDOH Screening for CHP+ Members for Rocky Mountain Health Plan - CHP+

Percentage Score of Evaluation Elements Met *	88%
Percentage Score of Critical Elements Met **	89%
Confidence Level***	Low Confidence

Table B—3 2024-25 Overall Confidence That the PIP Achieved Significant Improvement (Step 9) for Improving the Rate of SDOH Screening for CHP+ Members for Rocky Mountain Health Plan - CHP+

Percentage Score of Evaluation Elements Met *	67%
Percentage Score of Critical Elements Met **	100%
Confidence Level***	Moderate Confidence

The *Not Assessed* and *Not Applicable* scores have been removed from the scoring calculations.

* The percentage score of evaluation elements *Met* is calculated by dividing the total number *Met* by the sum of all evaluation elements *Met*, *Partially Met*, and *Not Met*.

** The percentage score of critical elements *Met* is calculated by dividing the total critical elements *Met* by the sum of the critical elements *Met*, *Partially Met*, and *Not Met*.

*** Confidence Level: See confidence level definitions on next page.



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EVALUATION OF THE OVERALL VALIDITY AND RELIABILITY OF PIP RESULTS

HSAG assessed the MCO's PIP based on CMS Protocol 1 to determine whether the MCO adhered to an acceptable methodology for all phases of design and data collection, and conducted accurate data analysis and interpretation of PIP results. HSAG's validation of the PIP determined the following:

High Confidence:	High confidence in reported PIP results. All critical evaluation elements were <i>Met</i> , and 90 percent to 100 percent of all evaluation elements were <i>Met</i> across all steps.
Moderate Confidence:	Moderate confidence in reported PIP results. All critical evaluation elements were <i>Met</i> , and 80 percent to 89 percent of all evaluation elements were <i>Met</i> across all steps.
Low Confidence:	Low confidence in reported PIP results. Across all steps, 65 percent to 79 percent of all evaluation elements were <i>Met</i> ; or one or more critical evaluation elements were <i>Partially Met</i> .
No Confidence:	No confidence in reported PIP results. Across all steps, less than 65 percent of all evaluation elements were <i>Met</i> ; or one or more critical evaluation elements were <i>Not Met</i> .

Confidence Level for Acceptable Methodology: *Low Confidence*

HSAG assessed the MCO's PIP based on CMS Protocol 1 and determined whether the MCO produced evidence of significant improvement. HSAG's validation of the PIP determined the following:

High Confidence:	All performance indicators demonstrated <i>statistically significant</i> improvement over the baseline.
Moderate Confidence:	To receive <i>Moderate Confidence</i> for significant improvement, one of the three scenarios below occurred: <ol style="list-style-type: none"> 1. All performance indicators demonstrated improvement over the baseline, and some but not all performance indicators demonstrated <i>statistically significant</i> improvement over the baseline. 2. All performance indicators demonstrated improvement over the baseline, and none of the performance indicators demonstrated <i>statistically significant</i> improvement over the baseline. 3. Some but not all performance indicators demonstrated improvement over baseline, and some but not all performance indicators demonstrated <i>statistically significant</i> improvement over baseline.
Low Confidence:	The remeasurement methodology was not the same as the baseline methodology for at least one performance indicator or some but not all performance indicators demonstrated improvement over the baseline and none of the performance indicators demonstrated <i>statistically significant</i> improvement over the baseline.
No Confidence:	The remeasurement methodology was not the same as the baseline methodology for all performance indicators or none of the performance indicators demonstrated improvement over the baseline.

Confidence Level for Significant Improvement: *Moderate Confidence*