



CHP+

Child Health Plan *Plus*

Colorado Children's Health Insurance Program

Fiscal Year 2019–2020 PIP Validation Report *for* Colorado Access

April 2020

*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

The Code of Federal Regulations at 42 CFR Parts 438 and 457—managed care regulations for Medicaid and the Children’s Health Insurance Program (CHIP), with revisions released May 6, 2016, and effective July 1, 2017, for Medicaid managed care and July 1, 2018, for CHIP managed care require states that contract with managed care health plans (health plans) to conduct an external quality review (EQR) of each contracting health plan. Health plans include managed care organizations (MCOs), prepaid inpatient health plans (PIHPs), primary care case management entities (PCCM entities), and prepaid ambulatory health plans (PAHPs). The regulations at 42 CFR §438.350 require that the EQR include, conducted by an external quality review organization (EQRO), analysis and evaluation of aggregated information on healthcare quality, timeliness, and access. Health Services Advisory Group, Inc. (HSAG) serves as the EQRO for the State of Colorado, Department of Health Care Policy and Financing (the Department)—the agency responsible for the overall administration and monitoring of Colorado’s Medicaid managed care program and Child Health Plan *Plus* (CHP+), Colorado’s program to implement CHIP managed care.

Pursuant to 42 CFR §457.1250, which requires states’ CHIP managed care programs to participate in EQR, the Department required its CHP+ health plans to conduct and submit performance improvement projects (PIPs) annually for validation by the state’s EQRO. **Colorado Access (COA)**, an MCO, holds the contract with the State of Colorado for provision of medical and behavioral health services for the Department’s CHP+ managed care program.

For fiscal year (FY) 2019–2020, the Department required health plans to conduct PIPs in accordance with 42 CFR §438.330(b)(1) and §438.330(d)(2)(i-iv), and each PIP must include:

- Measurement of performance using objective quality indicators.
- Implementation of systematic interventions to achieve improvement in quality.
- Evaluation of the effectiveness of the interventions.
- Planning and initiation of activities for increasing or sustaining improvement.

As one of the mandatory EQR activities required by 42 CFR §438.358(b)(1)(i), HSAG, as the State’s EQRO, validated the PIPs through an independent review process. In its PIP evaluation and validation, HSAG used the Department of Health and Human Services, Centers for Medicare & Medicaid Services (CMS) publication, *EQR Protocol 3: Validating Performance Improvement Projects (PIPs): A Mandatory Protocol for External Quality Review (EQR)*, Version 2.0, September 2012.¹⁻¹

¹⁻¹ Department of Health and Human Services, Centers for Medicare & Medicaid Services. *EQR Protocol 3: Validating Performance Improvement Projects (PIPs): A Mandatory Protocol for External Quality Review (EQR)*, Version 2.0, September 2012. Available at: <https://www.medicaid.gov/medicaid/quality-of-care/medicaid-managed-care/external-quality-review/index.html>. Accessed on: January 27, 2020.

Over time, HSAG and some of its contracted states identified that while the MCOs had designed methodologically valid projects and received *Met* validation scores by complying with documentation requirements, few MCOs had achieved real and sustained improvement. In July 2014, HSAG developed a new PIP framework based on a modified version of the Model for Improvement developed by Associates in Process Improvement and modified by the Institute for Healthcare Improvement.¹⁻² The redesigned PIP methodology is intended to improve processes and outcomes of healthcare by way of continuous quality improvement. The redesigned framework redirects MCOs to focus on small tests of change to determine which interventions have the greatest impact and can bring about real improvement. PIPs must meet CMS requirements; therefore, HSAG completed a crosswalk of this new framework against the Department of Health and Human Services CMS publication, *EQR Protocol 3: Validating Performance Improvement Projects (PIPs): A Mandatory Protocol for External Quality Review (EQR)*, Version 2.0, September 2012.

HSAG presented the crosswalk and new PIP framework components to CMS to demonstrate how the new PIP framework aligned with the CMS validation protocols. CMS agreed that given the pace of quality improvement science development and the prolific use of Plan-Do-Study-Act (PDSA) cycles in modern improvement projects within healthcare settings, a new approach was needed.

PIP Components and Process

The key concepts of the new PIP framework include forming a PIP team, setting aims, establishing a measure, determining interventions, testing interventions, and spreading successful changes. The core component of the new approach involves testing changes on a small scale—using a series of PDSA cycles and applying rapid-cycle learning principles over the course of the improvement project to adjust intervention strategies—so that improvement can occur more efficiently and lead to long-term sustainability. The duration of rapid-cycle PIPs is 18 months.

PIP Terms

SMART (Specific, Measurable, Attainable, Relevant, Time-bound) Aim directly measures the PIP's outcome by answering the following: *How much improvement, to what, for whom, and by when?*

Key Driver Diagram is a tool used to conceptualize a shared vision of the theory of change in the system. It enables the MCO's team to focus on the influences in cause-and-effect relationships in complex systems.

FMEA (Failure Modes and Effects Analysis) is a systematic, proactive method for evaluating processes that helps to identify where and how a process is failing or might fail in the future. FMEA is useful to pinpoint specific steps most likely to affect the overall process, so that interventions may have the desired impact on PIP outcomes.

PDSA (Plan-Do-Study-Act) cycle follows a systematic series of steps for gaining knowledge about how to improve a process or an outcome.

¹⁻² Langley GL, Moen R, Nolan KM, Nolan TW, Norman CL, Provost LP. *The Improvement Guide: A Practical Approach to Enhancing Organizational Performance* (2nd edition). San Francisco: Jossey-Bass Publishers; 2009. Available at: <http://www.ihl.org/resources/Pages/HowtoImprove/default.aspx>. Accessed on: February 6, 2020.

For this PIP framework, HSAG developed five modules with an accompanying reference guide. Prior to issuing each module, HSAG held technical assistance sessions with the MCOs to educate about application of the modules. The five modules are defined as:

- **Module 1—PIP Initiation:** Module 1 outlines the framework for the project. The framework includes the topic rationale and supporting data, building a PIP team, setting aims (Global and SMART), and completing a key driver diagram.
- **Module 2—SMART Aim Data Collection:** In Module 2, the SMART Aim measure is operationalized and the data collection methodology is described. SMART Aim data are displayed using a run chart.
- **Module 3—Intervention Determination:** In Module 3, there is increased focus into the quality improvement activities reasonably thought to impact the SMART Aim. Interventions in addition to those in the original key driver diagram are identified using tools such as process mapping, failure modes and effects analysis (FMEA), and failure mode priority ranking, for testing via PDSA cycles in Module 4.
- **Module 4—Plan-Do-Study-Act:** The interventions selected in Module 3 are tested and evaluated through a thoughtful and incremental series of PDSA cycles.
- **Module 5—PIP Conclusions:** In Module 5, the MCO summarizes key findings and outcomes, presents comparisons of successful and unsuccessful interventions, lessons learned, and the plan to spread and sustain successful changes for improvement achieved.

Approach to Validation

HSAG obtained the data needed to conduct the PIP validation from COA's module submission forms. In FY 2019–2020, these forms provided detailed information about COA's PIP and the activities completed in Module 3. (See Appendix A. Module Submission Form.)

Following HSAG's rapid-cycle PIP process, the health plan submits each module according to the approved timeline. Following the initial validation of each module, HSAG provides feedback in the validation tools. If validation criteria are not achieved, the health plan has the opportunity to seek technical assistance from HSAG. The health plan resubmits the modules until all validation criteria are met. This process ensures that the PIP methodology is sound prior to the health plan progressing to intervention testing.

The goal of HSAG's PIP validation is to ensure that the Department and key stakeholders can have confidence that any reported improvement is related to and can be directly linked to the quality improvement strategies and activities conducted by the health plan during the PIP. HSAG's scoring methodology evaluates whether the health plan executed a methodologically sound improvement project and confirms that any improvement achieved could be clearly linked to the quality improvement strategies implemented by the health plan.

Validation Scoring

During validation, HSAG determines if criteria for each module are *Achieved*. Any validation criteria not applicable (N/A) were not scored. As the PIP progresses, and at the completion of Module 5, HSAG will use the validation findings from modules 1 through 5 for each PIP to determine a level of confidence representing the validity and reliability of the PIP. Using a standardized scoring methodology, HSAG will assign a level of confidence and report the overall validity and reliability of the findings as one of the following:

- **High confidence** = The PIP was methodologically sound, the SMART Aim was achieved, the demonstrated improvement was clearly linked to the quality improvement processes conducted and intervention(s) tested, and the MCO accurately summarized the key findings.
- **Confidence** = The PIP was methodologically sound, the SMART Aim was achieved, and the MCO accurately summarized the key findings. However, some, but not all, quality improvement processes conducted and/or intervention(s) tested were clearly linked to the demonstrated improvement.
- **Low confidence** = (A) the PIP was methodologically sound; however, the SMART Aim goal was not achieved; or (B) the SMART Aim goal was achieved; however, the quality improvement processes conducted and/or intervention(s) tested were poorly executed and could not be linked to the improvement.
- **Reported PIP results were not credible** = The PIP methodology was not executed as approved.

PIP Topic Selection

In FY 2019–2020, COA submitted the following PIP topic for validation: *Well-Child Visits for Members 10–14 Years of Age*.

COA defined a Global Aim and SMART Aim for the PIP. The SMART Aim statement includes the narrowed population, the baseline rate, a set goal for the project, and the end date. HSAG provided the following parameters to the health plan for establishing the SMART Aim for the PIP:

- **Specific**: The goal of the project: What is to be accomplished? Who will be involved or affected? Where will it take place?
- **Measurable**: The indicator to measure the goal: What is the measure that will be used? What is the current data figure (i.e., count, percent, or rate) for that measure? What do you want to increase/decrease that number to?
- **Attainable**: Rationale for setting the goal: Is the achievement you want to attain based on a particular best practice/average score/benchmark? Is the goal attainable (not too low or too high)?
- **Relevant**: The goal addresses the problem to be improved.
- **Time-bound**: The timeline for achieving the goal.

Table 1-1 includes the PIP title and SMART Aim statement selected by **COA**.

Table 1-1—PIP Title and SMART Aim Statement

PIP Title	SMART Aim Statement
<i>Well-Child Visits for Members 10–14 Years of Age</i>	By June 30, 2020, increase the percentage of well-child visits among members 10–14 years of age attributed to STRIDE Community Health Centers, from 25.28% to 37.18%.

The focus of the PIP is to increase the rate of well-child visits among members 10 through 14 years of age who receive care from the narrowed focus provider group.

Table 1-2 summarizes the progress **COA** has made in completing the five PIP modules.

Table 1-2—PIP Title and Module Status

PIP Title	Module	Status
<i>Well-Child Visits for Members 10–14 Years of Age</i>	1. PIP Initiation	Completed and achieved all validation criteria.
	2. SMART Aim Data Collection	Completed and achieved all validation criteria.
	3. Intervention Determination	Completed and achieved all validation criteria.
	4. Plan-Do-Study-Act (PDSA)	Initiated in July 2019, with PDSA cycles continuing through SMART Aim end date of June 30, 2020.
	5. PIP Conclusions	Targeted submission for October 2020.

At the time of the FY 2019–2020 PIP validation report, **COA** had passed Module 1, Module 2, and Module 3, achieving all validation criteria for the PIP. **COA** has progressed to intervention testing in Module 4—Plan-Do-Study-Act. The final Module 4 and Module 5 submissions are targeted for October 2020; the Module 4 and Module 5 validation findings and the level of confidence assigned to the PIP will be reported in the FY 2020–2021 PIP validation report.

2. Findings

Validation Findings

In FY 2019–2020, **COA** completed and submitted Module 3 for validation. Detailed module documentation submitted by the health plan is provided in Appendix A. Module Submission Form.

The objective of Module 3 is for the MCO to determine potential interventions for the project. In this module, the MCO asks and answers the question, “What changes can we make that will result in improvement?”

The following section outlines the validation findings for the module. Detailed validation criteria, scores, and feedback from HSAG are provided in Appendix B. Module Validation Tool.

Module 3: Intervention Determination

COA completed a process map and an FMEA to determine the areas within its process that demonstrated the greatest need for improvement, have the most impact on the desired outcomes, and can be addressed by potential interventions. Table 2-1 summarizes the potential interventions **COA** identified to address high-priority subprocesses and failure modes determined in Module 3.

Table 2-1—Module 3 Intervention Determination Summary for the *Well-Child Visits for Members 10–14 Years of Age* PIP

Failure Modes	Potential Interventions
Physicians are performing qualifying well visit services during a sick visit but are not billing appropriately	Face-to-face and/or virtual training on appropriate billing practices for well visit services for providers and billing staff members. Training would be accompanied by ongoing support from COA as needed.
Sick visit appointment times cannot be extended to incorporate well visit services	Adding an additional step in the sick visit process flow to ensure that a follow-up well visit appointment is scheduled for members who could not have their sick visit appointment time extended for well visit services. The process change would eventually incorporate digital appointment reminders and provider outreach activities.

At the time of this FY 2019–2020 PIP validation report, **COA** had completed its PIP through Module 3 and had initiated the intervention planning phase in Module 4. **COA** submitted two intervention plans in July 2019. Table 2-2 summarizes the two interventions **COA** selected for testing through PDSA cycles.

Table 2-2—Planned Interventions for the *Improving Well-Child Visits for Members 10–14 Years of Age* PIP

Intervention Description	Key Drivers	Failure Modes
Conduct targeted telephonic outreach to members ages 10–14 who are due or overdue for their annual well visit	Providers have information and processes needed to conduct member outreach to encourage members to schedule an annual well visit	<ul style="list-style-type: none"> Members and/or their parents may not receive the mailings or text reminders Mailings or text reminders may not be sufficient to encourage members and/or their parents to schedule a well visit appointment
Provider and staff member training to ensure well visit services are itemized in the billing process, particularly if these services are added on to other types of appointments	Coding consistencies for well visits across clinic settings	Services are occurring but not being accurately billed or documented

COA selected two interventions, one member-focused intervention and one provider intervention, to test using PDSA cycles in Module 4. The member-focused intervention included telephonic outreach to members in need of a well visit to address a failure mode related to members and parents not receiving or responding to well visit reminders. The provider-focused intervention included training to promote appropriate well visit billing practices to address a failure mode related to services occurring but not being accurately documented in the billing process. HSAG reviewed the intervention plans for the two interventions and provided written feedback and technical assistance to **COA**. The health plan is currently in the “Do” stage of the PDSA cycles for each intervention, carrying out the intervention and evaluating impact. HSAG will report the intervention testing results and final Module 4 and Module 5 validation findings in the next annual PIP validation report.

3. Conclusions and Recommendations

Conclusions

The validation findings suggest that **COA** successfully completed Module 3 and identified opportunities for improving the process related to obtaining a well visit for members 10 through 14 years of age. **COA** further analyzed opportunities for improvement in Module 3 and considered potential interventions to address the identified process flaws or gaps and increase the percentage of members who receive a well visit. The health plan also successfully initiated Module 4 by selecting an intervention to test and documenting a plan for evaluating the impact of the intervention through PDSA cycles. **COA** will continue testing interventions for the PIP through June 30, 2020. The health plan will submit complete intervention testing results and PIP conclusions for validation in FY 2020–2021. HSAG will report the final validation findings for the PIP in the FY 2020–2021 PIP validation report.

Recommendations

- When planning a test of change, **COA** should clearly identify and communicate the necessary steps that will be taken to carry out an intervention including details that define who, what, where, and how the intervention will be carried out.
- To ensure a methodologically sound intervention testing methodology, **COA** should determine the best method for identifying the intended effect of an intervention prior to testing. Intervention testing measures and data collection methodologies should allow the health plan to rapidly determine the direct impact of the intervention. The testing methodology should allow the health plan to quickly gather data and make data-driven revisions to facilitate achievement of the SMART Aim goal.
- **COA** should consistently use the approved Module 2 SMART Aim measure data collection and calculation methods for the duration of the PIP so that the final SMART Aim measure run chart provides data for a valid comparison of results to the goal.
- When reporting the final PIP conclusions, **COA** should accurately and clearly report intervention testing results and SMART Aim measure results, communicating any evidence of improvement and demonstrating the link between intervention testing and demonstrated improvement.
- If improvement is achieved through the PIP, **COA** should develop a plan for continuing and spreading effective interventions and sustaining improvement in the long term.

Appendix A. Module Submission Form

Appendix A contains the Module Submission Form provided by the health plan.



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Managed Care Organization (MCO) Information	
MCO Name:	Colorado Access (COA)
PIP Title:	Well-Child Visits for Members 10–14 Years of Age
Contact Name:	Kiah Vandergrift
Contact Title:	Quality Improvement Program Manager
E-mail Address:	Kiah.vandergrift@coaccess.com
Telephone Number:	720-744-5375
Submission Date:	April 12, 2019



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Process Mapping

Indicate when the process map(s) was completed and list all team members involved. Describe the role and responsibilities for each individual team member. The team should include a data analyst. The analyst can assist with determining data needed for prioritization of subprocesses and failure modes and proposed interventions.

Table 1—Process Mapping Team	
Development Period	
03/12/2019 – 3/28/2019	
Team Members Involved	Role/Responsibilities
Kiah Vandergrift	Quality Improvement Program Manager, Colorado Access. PIP project management, internal and external stakeholder engagement, coordinating data collection process, developing process maps.
Catherine Morrissey	Quality Improvement Program Manager, Colorado Access. PIP project support and internal training.
Brian Bandle	Quality Improvement Program Analyst, Colorado Access. Responsible for data collection and report generation, providing subject matter expertise on data needed and available for prioritization of failure modes and interventions.
Heather Logan	Director of Population Health, STRIDE Community Health Center.* Subject matter expert and process owner at STRIDE Community Health Center.
Bethany Himes	Vice President of Provider Engagement, Colorado Access. PIP Executive Sponsor.

***Please Note:** Effective April 1, 2019, Colorado Access’ partner for this PIP, Metro Community Provider Network (MCPN), changed their name to STRIDE Community Health Center. There are no changes to data or attribution beyond the name of the agency itself.



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Failure Modes and Effects Analysis (FMEA)

Indicate when the FMEA was completed and list all team members involved. Describe the role and responsibilities for each individual team member. The team should include a data analyst. The analyst can assist with determining data needed for prioritization of subprocesses and failure modes and proposed interventions.

Table 2—Failure Modes and Effects Analysis Team	
Development Period	
4/1/2019 to 4/5/2019	
Team Members Involved	Role/Responsibilities
Kiah Vandergrift	Quality Improvement Program Manager, Colorado Access. PIP project management, internal and external stakeholder engagement, coordinating data collection process, developing process maps.
Catherine Morrissey	Quality Improvement Program Manager, Colorado Access. PIP project support.
Brian Bandle	Quality Improvement Program Analyst, Colorado Access. Responsible for data collection and report generation, providing subject matter expertise on data needed and available for prioritization of failure modes and interventions.
Heather Logan	Director of Population Health, STRIDE Community Health Center. Subject matter expert and process owner at STRIDE Community Health Center.
Tyler Watlington	Medical Director, Colorado Access. Clinical subject matter expert and project support.
Bethany Himes	Vice President of Provider Engagement, Colorado Access. Executive Sponsor for the Performance Improvement Project.



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Process Mapping

Develop a process map that aligns with the SMART Aim measure from the perspective of the person most impacted by the overall process (typically the member). The MCO may need to complete and submit more than one process map (i.e., member-level, provider-level, MCO-level, new members, existing members, etc.).

Clearly identify subprocesses (opportunities for improvement) within the process map. These subprocesses will be used in the FMEA table. Assign a numerical value to each identified subprocess based on having the greatest potential of impacting the SMART Aim. In addition to providing the process map(s), provide a narrative description of the PIP team's process and rationale for the selection of subprocesses with the greatest impact on the SMART Aim.

(Insert Process Map Here—Use attachments or additional pages if more space is required)

Please see the attached document titled:

- STRIDE Process Map Well VisitsV2.vsdX



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Process Mapping

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Clearly identify subprocesses (opportunities for improvement) within the process map. These subprocesses will be used in the FMEA table. Assign a numerical value to each identified subprocess based on having the greatest potential of impacting the SMART Aim. In addition to providing the process map(s), provide a narrative description of the PIP team's process and rationale for the selection of subprocesses with the greatest impact on the SMART Aim.

Description of process and rationale for selection of subprocesses:

Description of Process

First, the team (listed in Table 1) identified which process to map. The attached process map identifies the process for members ages 10-14 receiving a well visit, with input provided by the specific clinic and provider-facing staff at Colorado Access. We chose to map this process because we believe it is within this process that COA will have the best chance to move this measure within the Rapid-Cycle PIP timeline.

The PIP process mapping team included subject matter experts including the Director of Population Health at STRIDE who is the process owner. We leveraged this expertise to learn the process from our clinic partner to create the attached process map. The FMEA team included those same individuals with the addition of an internal COA Medical Director to identify potential failure modes and interventions. This FMEA team conducted a meetings to identify the sub-processes with critical failure modes that could lead to COA not achieving our PIP SMART aim and to brainstorm potential interventions.

Rationale for Selection of Sub-Processes:

The process mapping team identified three (3) key criteria to use when selecting sub-processes for the FMEA analysis. These include:

1. Is there sufficient data (qualitative and quantitative) for each sub-process to measure performance over time?
2. Does COA have the ability to significantly impact the sub-process within the Rapid-Cycle PIP timeline?



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Process Mapping

Develop a process map that aligns with the SMART Aim measure from the perspective of the person most impacted by the overall process (typically the member). The MCO may need to complete and submit more than one process map (i.e., member-level, provider-level, MCO-level, new members, existing members, etc.).

Clearly identify subprocesses (opportunities for improvement) within the process map. These subprocesses will be used in the FMEA table. Assign a numerical value to each identified subprocess based on having the greatest potential of impacting the SMART Aim. In addition to providing the process map(s), provide a narrative description of the PIP team's process and rationale for the selection of subprocesses with the greatest impact on the SMART Aim.

-
3. To what extent does a failure within the sub-process lead to a failure to achieve the overarching goal?

After talking through each of these criteria for these sub-processes, the team identified the following two (2) sub-processes to prioritize:

1. Bill Appropriate Wellness Codes
2. Day-of morning huddle to identify opportunities to incorporate well-visit



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Failure Modes and Effects Analysis

From the completed process map(s), enter up to three subprocesses that have the potential to make the greatest impact on the SMART Aim. The assigned priority number in the process map should align with the subprocess number in the FMEA table. This will help clearly link each opportunity for improvement to an identified subprocess.

Complete the table with the corresponding failure modes, failure causes, and failure effects.

Note: The MCO should ensure that the same language is used consistently to describe the failure modes throughout Modules 3, 4, and 5.

Table 3—Failure Modes and Effects Analysis Table			
Subprocesses	Failure Modes (What could go wrong?)	Failure Causes (Why would the failure happen?)	Failure Effects (What are the consequences?)
1. Bill appropriate wellness codes	Physicians are performing qualifying well-visit services during a sick visit, but are not accurately capturing that work in their billing practices.	Provider not educated about proper billing process for qualifying well-visit services.	Member receives well-visit, but it is not captured in the data to count towards this measure.
2. Day-of morning huddle to identify opportunities to incorporate well-visit	Appointment times cannot be extended to incorporate well-visit activities.	The clinic is at full appointment capacity for the day.	Members aged 10-14 who are coming in for a sick visit do not get added-benefits of well-visit activities, and would need to return for subsequent visit for service to occur.



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Failure Mode Priority Ranking

Based on the results of the priority ranking process, list the numerically ranked failure modes from highest to lowest priority. In the space below the table, please describe the process used to assign the priority ranking.

Table 4—Failure Mode Priority Ranking	
Priority Ranking	Failure Modes
1	Physicians are performing qualifying well-visit services during a sick visit, but are not billing the appropriate codes.
2	Appointment times cannot be extended to incorporate well-visit activities.

Description of priority ranking process (i.e., Risk Priority Number (RPN) method). If the RPN method was used, please provide the numeric values from the calculations:

COA identified 3 key criteria to use when selecting and prioritizing sub-processes for the FMEA analysis. These include:

1. Is there sufficient data (qualitative and quantitative) for each sub-process to measure performance over time?
2. Does COA have the ability to significantly impact the sub-process within the Rapid-Cycle PIP timeline?
3. How great of an impact does this have on the SMART aim?

The FMEA team qualitatively walked through each of these questions and determined the priority rankings above. We incorporated feedback from the practices themselves as well as internal COA subject matter experts who work alongside the practices to implement quality interventions, including COA Medical Directors and Practice Facilitators. We believe that prioritizing the failure modes in this order will give COA the optimal chance of success within the Rapid-Cycle PIP timeline.



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Intervention Determination

In the Intervention Determine table, enter at a minimum, the top three ranked failure modes and the identified intervention to address the failure mode.

Table 5—Intervention Determination Table	
Failure Modes	Interventions
Physicians are performing qualifying well-visit services during a sick visit, but are not billing appropriately.	Ensure that providers are itemizing well-visits, particularly if these services are added-on to other appointments that a member receives. Colorado Access would do this by conducting face-to-face and/or virtual training and ongoing support as needed to STRIDE Community Health Center providers and billing staff.
Appointment times cannot be extended to incorporate well-visit activities.	Pilot an additional step to the process to ensure that, upon checkout, members who attended for a sick-visit but could not have their appointment time extended are scheduling a follow-up well-visit. With time, work to ensure this subsequent appointment is incorporated into digital reminders and provider outreach.

Appendix B. Module Validation Tool

Appendix B contains the Module Validation Tool provided by HSAG.



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Criteria	Achieved (Y/N)	HSAG Feedback and Recommendations
1. The documentation included the team members responsible for completing the process map(s) and failure mode and effects analysis (FMEA).	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
2. The documentation included a process map(s) illustrating the step-by-step flow of the current process. The subprocesses identified in the process map(s) as opportunities for improvement were prioritized and assigned a numerical ranking.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>HSAG identified the following potential opportunities for improvement with the process map:</p> <ul style="list-style-type: none"> For targeted outreach to members needing a well-visit, it appears that “member reaches out to schedule well-visit” should be a decision point with yes/no options. When no, the health plan should specify what follow-up steps are taken. If none, the health plan should document “no plan exists.” It appeared that once an appointment is scheduled after “Member reaches out to schedule well-visit”, a decision point step should be added for whether the member attends the visit, with yes/no. When no, the health plan should include what is the follow-up. If none, the health plan should document a step as “no plan exists.” It appeared that “Bill appropriate wellness codes” should come after “Member Aged 10-14 receives well-visit” in the process map. <p>Re-review May 2019: The health plan revised the process map and addressed HSAG’s feedback. The criterion was achieved.</p>



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Criteria	Achieved (Y/N)	HSAG Feedback and Recommendations
3. The health plan included a description of the process and rationale used for the selection of subprocesses in the FMEA table.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
4. Each subprocess in the FMEA table aligned with a numerically ranked opportunity for improvement in the process map(s), and was logically linked to the documented failure modes, causes, and effects.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
5. The health plan described the failure mode priority ranking process. If the RPN method was used, the health plan provided the numeric calculations.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
6. The interventions listed in the Intervention Determination table were appropriate based on the ranked failure modes.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	HSAG identified the following opportunities for improvement with the potential interventions: <ul style="list-style-type: none"> For the intervention to address the first failure mode (physicians not billing appropriately), the health plan should describe how it would “ensure” that providers itemize well-child visits. What specific change would be made? An example of a specific change would be face-to-face provider training. For “Member does not attend the scheduled appointment (no-shows)”, the health plan described potential analyses that would be conducted but did not describe a specific intervention to be tested. The health plan



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Criteria	Achieved (Y/N)	HSAG Feedback and Recommendations
		<p>should provide a specific change(s) that could be tested to address the failure mode.</p> <p>Re-review May 2019: The health plan revised the intervention documentation in Table 5 and addressed HSAG’s feedback. The criterion was achieved.</p>

Intervention Determination (Module 3)

☒ Pass

Date: May 30, 2019