



COLORADO

**Department of Health Care
Policy & Financing**

MY 2024 HEDIS® Compliance Audit Aggregate Report

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Colorado Department of Health Care Policy and Financing.*



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Executive Summary

The Colorado Department of Health Care Policy and Financing (HCPF) administers Health First Colorado (Colorado's Medicaid program) and contracts with Health Services Advisory Group, Inc. (HSAG) to perform the four mandatory external quality review (EQR) activities required by the Medicaid managed care regulations. Validation of the performance measures calculated and submitted by each managed care organization (MCO) is one of these mandatory activities as articulated in 42 Code of Federal Regulations (CFR) §438.358. HCPF contracted with HSAG, an external quality review organization (EQRO), to conduct the validation of performance measures for two MCOs, Denver Health Medical Plan (DHMP) and Rocky Mountain Health Plans Medicaid Prime (RMHP Prime), based on measurement year (MY) 2024 data.

HCPF opted to use select National Committee for Quality Assurance (NCQA) Healthcare Effectiveness Data and Information Set (HEDIS®)¹ measures as the performance measures and calendar year 2024 as the measurement period for validation. Developed and maintained by NCQA, HEDIS is a set of performance measures broadly accepted in the managed care environment as an industry standard. Because the MCOs calculated and submitted performance measures and underwent an NCQA HEDIS Compliance Audit™,² HSAG validated the results from the audits to meet the requirements articulated in the Medicaid managed care regulations. More specifically, HSAG's role in the validation of performance measures was to ensure that the validation activities were conducted as outlined in the Centers for Medicare & Medicaid Services (CMS) publication, *CMS External Quality Review (EQR) Protocols, February 2023*.³

The primary objectives of the performance measure validation process were to:

- Evaluate the accuracy of the performance measure data collected by the MCOs.
- Determine the extent to which the specific performance measures calculated by the MCOs followed the specifications established for each performance measure.

Based on HSAG's reviews, both MCOs' information systems and processes were compliant with all information system (IS) standards and the HEDIS determination reporting requirements.

¹ HEDIS® is a registered trademark of the National Committee for Quality Assurance (NCQA).

² NCQA HEDIS Compliance Audit™ is a trademark of NCQA. The purpose of conducting a HEDIS audit is to ensure that rates submitted by the MCOs are reliable, valid, accurate, and can be compared to one another. For a brief overview of the NCQA HEDIS Compliance Audit, please refer to Appendix A.

³ Department of Health and Human Services, Centers for Medicare & Medicaid Services. *External Quality Review (EQR) Protocols, February 2023*. Available at: <https://www.medicare.gov/medicaid/quality-of-care/downloads/2023-eqr-protocols.pdf>. Accessed on: Aug 20, 2025.

Background

Each MCO underwent an NCQA HEDIS Compliance Audit through an NCQA-licensed audit organization of its choice and submitted the audited results and audit statement to HSAG. Since the audits were conducted in compliance with NCQA’s *HEDIS Measurement Year (MY) 2024 Compliance Audit: Standards, Policies, and Procedures, Volume 5*, and the NCQA HEDIS Compliance Audit is consistent with the CMS Performance Measure Validation Protocol, the findings, and results from the NCQA HEDIS Compliance Audit can be reviewed, validated, and eventually accepted as findings for the validation of performance measures to meet the managed care requirements.

Performance Measure List

The NCQA-licensed audit organizations validated, at a minimum, a set of performance measures selected by HCPF. The measures, which are listed in Table 1, are HEDIS and CMS Core Set measures that follow the definitions outlined in CMS’ *Core Set of Adult/Child Health Care Quality Measures for Medicaid Reporting Manual*, and the reporting method required by HCPF.

Table 1—Health First Colorado MY 2024 Performance Measure Reporting Set

Performance Measures	Reporting Methodology
<i>Avoidance of Antibiotic Treatment for Acute Bronchitis/Bronchiolitis—3 Months–17 Years, 18–64 Years, and 65 Years and Older*</i>	Administrative
<i>Antidepressant Medication Management—Effective Acute Phase Treatment and Effective Continuation Phase Treatment</i>	Administrative
<i>Asthma Medication Ratio—5–11 Years, 12–18 Years, 19–50 Years, and 51–64 Years</i>	Administrative
<i>Breast Cancer Screening—50–64 Years and 65–74 Years</i>	Administrative
<i>Controlling High Blood Pressure</i>	Administrative
<i>Contraceptive Care—Postpartum Women—15–20 Years and 21–44 Years</i>	Administrative
<i>Cervical Cancer Screening</i>	Administrative
<i>Contraceptive Care—All Women—15–20 Years and 21–44 Years</i>	Administrative
<i>Screening for Depression and Follow-Up Plan—12–17 Years, 18–64 Years, and 65 Years and Older</i>	Administrative
<i>Chlamydia Screening in Women—16–20 Years and 21–24 Years</i>	Administrative
<i>Concurrent Use of Opioids and Benzodiazepines*</i>	Administrative
<i>Colorectal Cancer Screening</i>	Administrative

Performance Measures	Reporting Methodology
<i>Follow-Up After Emergency Department Visit for Substance Use—13–17 Years, 18–64 Years, and 65 Years and Older</i>	Administrative
<i>Follow-Up After Hospitalization for Mental Illness—6–17 Years, 18–64 Years, and 65 Years and Older</i>	Administrative
<i>Follow-Up After Emergency Department Visit for Mental Illness—7-Day Follow-Up and 30-Day Follow-Up—6–17 Years, 18–64 Years, and 65 Years and Older</i>	Administrative
<i>Glycemic Status Assessment for Patients With Diabetes</i>	Administrative
<i>Diabetes Care for People With Serious Mental Illness—HbA1c Poor Control (>9.0%)</i>	Administrative
<i>Initiation and Engagement of Substance Use Disorder (SUD) Treatment</i>	Administrative
<i>Use of Opioids at High Dosage in Persons Without Cancer*</i>	Administrative
<i>Use of Pharmacotherapy for Opioid Use Disorder</i>	Administrative
<i>Plan All-Cause Readmissions</i>	Administrative
<i>Prenatal and Postpartum Care—Timeliness of Prenatal Care and Postpartum Care</i>	Administrative
<i>Diabetes Short-Term Complications Admission Rate*</i>	Administrative
<i>Chronic Obstructive Pulmonary Disease (COPD) or Asthma in Older Adults Admission Rate*</i>	Administrative
<i>Heart Failure Admission Rate*</i>	Administrative
<i>Asthma in Younger Adults Admission Rate*</i>	Administrative
<i>Adherence—Antipsychotic Medications for Individuals With Schizophrenia</i>	Administrative
<i>Diabetes Screening for People With Schizophrenia or Bipolar Disorder Who Are Using Antipsychotic Medications</i>	Administrative
<i>Follow-Up Care for Children Prescribed Attention-Deficit/Hyperactivity Disorder (ADHD) Medication—Initiation Phase and Continuation and Maintenance Phase</i>	Administrative
<i>Metabolic Monitoring for Children and Adolescents on Antipsychotics</i>	Administrative
<i>Use of First-Line Psychosocial Care for Children and Adolescents on Antipsychotics</i>	Administrative
<i>Childhood Immunization Status—Combinations 3, 7, and 10</i>	Administrative
<i>Developmental Screening in the First Three Years of Life</i>	Administrative

Performance Measures	Reporting Methodology
<i>Immunizations for Adolescents—Combination 1 (Meningococcal, Tdap) and Combination 2 (Meningococcal, Tdap, HPV)</i>	Administrative
<i>Lead Screening in Children</i>	Administrative
<i>Well-Child Visits in the First 30 Months of Life—Well-Child Visits in the First 15 Months—Six or More Well-Child Visits and Well-Child Visits for 15 Months—30 Months—Two or More Well-Child Visits</i>	Administrative
<i>Weight Assessment and Counseling for Nutrition and Physical Activity for Children/Adolescents—Body Mass Index (BMI) Percentile, Counseling for Nutrition, and Counseling for Physical Activity</i>	Administrative
<i>Child and Adolescent Well-Care Visits</i>	Administrative

* Denotes the measure was not reported by the MCOs as the measure was optional to report for MY 2024.

Technical Methods of Analysis

The CMS Performance Measure Validation Protocol identifies key types of data that should be reviewed. As part of the validation process, HSAG aggregated several sources of HEDIS-related data to determine if the licensed organizations' (LOs') audit process met CMS requirements.

This performance measure validation report uses two primary sources—NCQA's Interactive Data Submission System (IDSS)/Custom Reporting Template data output reports and the final audit reports (FARs)—to tabulate overall HEDIS reporting capabilities and functions for the MCOs. The IDSS/Custom Reporting Template contained the final rates that were verified, reviewed, and locked by the LOs. The auditor-locking mechanism in the IDSS/Custom Reporting Template tool ensured that no information could be changed without the consent of NCQA and the auditor. The IDSS/Custom Reporting Template review process allowed the LOs to assess the reasonability of the rates submitted by the MCOs.

The following is a table identifying the key audit steps required by NCQA for the LO to conduct NCQA HEDIS Compliance Audits. The table also lists HSAG's approach in validating the LO's audit.

Table 2—Description of Data Sources Reviewed

Key Steps According to NCQA's HEDIS Compliance Audit	HSAG's Approach on Validating the LO's Audit Results
Initial Visit/Meeting —The initial conference call or meeting between the LOs and the MCO staff.	HSAG verified that key HEDIS topics such as timelines and virtual review dates were addressed by the LOs.
Roadmap Review —This review provided the LOs with background information on policies, processes, and data in preparation for virtual review validation activities. The MCOs were required to complete the Roadmap to provide the audit team with the necessary information to begin review activities. ⁴	HSAG looked for evidence in the final report that the LOs completed a thorough review of all components of the Roadmap.
Certified Measures/Source Code Review —Source code review is used to determine compliance with the performance measure definitions, including accurate numerator and denominator identification, sampling, and algorithmic compliance (to determine if rate calculations were performed correctly, medical record and administrative data were combined appropriately, and numerator events were counted accurately). This process is not necessary if the MCO contracts with a	If the MCO used a software vendor to produce HEDIS rates, HSAG used the FAR and measure certification letter to assess whether or not the software vendor achieved full measure certification status by NCQA for the reported HEDIS measures. HSAG ensured that the LOs reviewed the programming language for calculating the HEDIS measures if such a vendor was not used. Please note that HCPF required both MCOs to report all HEDIS and non-HEDIS measures; however, they were not required to be audited. Therefore, source

⁴ If the MCOs contracted certain data calculation, abstraction, or reporting functions to other vendors, they are responsible for ensuring that these vendors completed specific sections of the Roadmap such that the LOs have sufficient information to evaluate all the relevant systems and processes associated with HEDIS reporting.

Key Steps According to NCQA's HEDIS Compliance Audit	HSAG's Approach on Validating the LO's Audit Results
vendor participating in the NCQA Measure Certification ⁵ process.	code review for the non-HEDIS measures was not conducted by RMHP Prime's LO.
Consumer Assessment of Healthcare Providers and Systems (CAHPS®)⁶ Survey Vendor and Sample Frame Validation —A certified survey vendor must be used if the MCOs performed a CAHPS survey as part of HEDIS reporting.	HSAG verified that the LOs performed detailed validations on the CAHPS Sample Frame if the MCOs performed a CAHPS survey as part of HEDIS reporting. If the MCOs used a survey vendor to perform the CAHPS surveys, HSAG verified that an NCQA-Certified survey vendor was used.
Supplemental Data Validation —If the MCOs used any supplemental data for reporting, the LO was to validate the supplemental data according to NCQA's guideline.	HSAG verified whether the LOs were following the NCQA-required approach while validating the supplemental databases.
Convenience Sample Validation —The auditor reviews a small number of processed medical records to uncover potential problems in the process that may require corrective action early in the medical record review (MRR) process. A convenience sample must be prepared unless the auditor determines that the MCO is exempt. NCQA allows organizations to be exempt from the convenience sample if they participated in a HEDIS audit the previous year and passed MRR validation, and if the current MRR process has not changed significantly from the previous year and the organization does not report hybrid measures that the auditor determines to be at risk of inaccurate reporting.	HSAG did not review this step since the State requires administrative rates only.
Medical Record Review Validation (MRRV) —The LOs are required to perform a more extensive validation of medical records reviewed, which is conducted late in the abstraction process. This validation ensures that the review process was executed as planned and that the results are accurate.	HSAG did not review this step since the State requires administrative rates only.
IDSS Review —The MCOs are required to complete NCQA's IDSS for the submission of audited rates to NCQA. The auditor finalizes the IDSS by completing the audit review and entering an audit result. This process verifies that the auditor validated all activities that culminated in a rate by the MCOs. The auditor locks the IDSS so that no information can be changed.	HSAG verified that the LOs completed the IDSS review process.

⁵ NCQA Measure CertificationSM is a service mark of the National Committee for Quality Assurance (NCQA).

⁶ CAHPS® is a registered trademark of the Agency for Healthcare Research and Quality (AHRQ).

Validation Findings of Audit Process

Table 3 identifies the key elements used by the LOs while conducting their MY 2024 NCQA HEDIS Compliance Audits. These key elements were reviewed by HSAG during validation activities. As presented in Table 3, a checkmark indicates that the LOs reviewed the HEDIS activities, which confirmed that HEDIS methodology was being followed. Some activities are identified as being compliant by inserting the name of the company the MCO contracted with to perform the required tasks.

Table 3—Validation Activities

	DHMP	RMHP Prime
Licensed Organization	Attest Health Care Advisors	DTS Group
Initial Visit Call/Meeting	✓	✓
Roadmap Review	✓	✓
Software Vendor	Cotiviti	Inovalon, Inc. – Converged Analytics
Source Code/Certified Measure Review	✓	✓
Survey Vendor	Press Ganey/ SPH Analytics	Press Ganey
CAHPS Sample Frame Validation	✓	✓
Supplemental Data Validation	✓	✓
Medical Record Review Validation	✓	✓
IDSS Review	✓	✓

Table 3 indicates that the audit conducted for the MCOs included all of the listed validation activities. As required, the MCOs used an NCQA LO to perform the annual HEDIS audits. In addition, the MCOs contracted with vendors to calculate and produce rates, and all of these vendors achieved full measure certification status through NCQA for the reported HEDIS measures. Both the MCOs also used an NCQA-certified HEDIS survey vendor to administer the CAHPS survey(s). HSAG also determined that the data collected and reported for the HCPF-selected measures followed NCQA HEDIS methodology. Therefore, rates and audit results are valid, reliable, and accurate.

Compliance With IS Standards

In addition to ensuring that data were captured, reported, and presented in a uniform manner, HSAG evaluated each MCO's IS capabilities for accurate HEDIS reporting. HSAG reviewed the IS capabilities assessments of the MCOs, which were conducted by LOs and included in the FARs. The reviews specifically focused on those system aspects that could have impacted the reporting of the selected HEDIS Medicaid measures.

For the purpose of HEDIS compliance auditing, the terms "information system" and "IS" are used broadly to include the computer and software environment, data collection procedures, and abstraction of medical records for hybrid measures. The IS evaluation includes a review of any manual processes that may have been used for HEDIS reporting as well. The LOs determined if the MCOs had the automated systems, information management practices, processing environment, and control procedures to capture, access, translate, analyze, and report each HEDIS measure.

In accordance with NCQA's *HEDIS MY 2024 Compliance Audit: Standards, Policies, and Procedures, Volume 5*, the LOs evaluated IS compliance with NCQA's IS standards. These standards detail the minimum requirements that the MCOs' IS systems should meet, as well as criteria that any manual processes used to report HEDIS information must meet. For circumstances in which a particular IS standard was not met, the LOs rated the impact on HEDIS reporting capabilities and, particularly, any measure that could be impacted. The MCOs may not be fully compliant with many of the IS standards but may still be able to report the selected measures.

Based on HSAG's reviews, both MCOs' information systems and processes were compliant with all IS standards and the HEDIS determination reporting requirements.

The section that follows provides a summary of the MCOs' key findings for each IS standard as noted in its FAR. A more in-depth explanation of NCQA's IS standards is provided in Appendix A of this report.

Table 4—Summary of Compliance With IS Standards

NCQA's IS Standards	IS Standards Compliance Findings Based on HEDIS MY 2024 FAR Review
IS A—Administrative Data • Data conform with industry standards and measure requirements. • Data are complete and accurate. • Membership information system enables measurement.	The two MCOs were compliant with IS Standard A for data completeness and accuracy. All data elements required for HEDIS reporting were adequately captured. Both MCOs only accepted industry standard codes on industry standard forms. The MCOs had policies and procedures in place for submitting electronic data. Data elements required for reporting were captured. Adequate validation processes were in place, ensuring data accuracy.
IS M—Medical Record Review Processes • Forms capture all fields relevant to measure reporting. Electronic transmission procedures conform to industry standards and have necessary checking procedures to ensure data accuracy (logs, counts, receipts, hand-off and sign-off). • Retrieval and abstraction of data from medical records is reliably and accurately performed. • Data entry processes are timely and accurate and include sufficient edit checks to ensure accurate entry of submitted data in the files for measure reporting. • The organization continually assesses data completeness and takes steps to improve performance. • The organization regularly monitors vendor performance against expected performance standards.	Both MCOs were compliant with IS Standard M for MRR processes. Data collection tools used by the MCOs were able to capture all data fields necessary for HEDIS reporting. Sufficient validation processes were in place to ensure data accuracy. However, HSAG did not review this step since HCPF requires administrative rates only.
IS C—Clinical and Care Delivery Data • Data capture is complete. • Data conform with industry standards. • Transaction file data are accurate. • Organization confirms ingested data meet expectations for data quality.	Both MCOs were compliant with IS Standard C for clinical and care delivery data capture and processing. The MCOs appropriately captured and documented data. Data validation processes were in place to verify clinical and care delivery data. In addition, for accuracy and completeness, the MCOs reviewed all clinical and care delivery data received from delegated entities. The HEDIS repository contained all data fields required for HEDIS reporting. In addition, staff members were interviewed to confirm the appropriate quality processes

NCQA's IS Standards	IS Standards Compliance Findings Based on HEDIS MY 2024 FAR Review
	for the data source and to determine if primary source verification was needed on all supplemental data that were in nonstandard form.
IS R—Data Management and Reporting • The organization's data management enables measurement. • Data extraction and loads are complete and accurate. • Data transformation and integration is accurate and valid. • Data quality and governance are components of the organization's data management. • Oversight and controls ensure correct implementation of measure reporting software.	The MCOs were compliant with IS Standard R for data management and reporting. File consolidation and data extractions were performed by the MCOs' staff members. Data were verified for accuracy at each data merge point. Both MCOs were compliant for data integration. The MCOs used an NCQA-certified measure vendor for data production and rate calculation.

Appendix A. Information Systems Standards

Overview of the NCQA HEDIS Compliance Audit

Developed and maintained by NCQA, HEDIS is a set of performance data broadly accepted in the managed care environment as an industry standard. Organizations seeking NCQA accreditation or wishing to publicly report their HEDIS performance results undergo an NCQA HEDIS Compliance Audit through an NCQA-licensed audit organization. The audits are conducted in compliance with NCQA's *HEDIS MY 2024 Compliance Audit: Standards, Policies, and Procedures, Volume 5*. The purpose of conducting a HEDIS audit is to ensure that rates submitted by the organizations are reliable, valid, accurate, and can be compared to one another.

During the HEDIS audit, data management processes were reviewed using findings from the NCQA HEDIS Record of Administration, Data Management, and Processes (Roadmap) review; interviews with key staff members; and a review of queries and output files. Data extractions from systems used to house production files and generate reports were reviewed, including a review of data included in the samples for the selected measures. Based on validation findings, the LOs produced an initial written report identifying any perceived issues of noncompliance, problematic measures, and recommended opportunities for improvement. The LOs also produced a final report with updated text and findings based on comments on the initial report.

The FAR included information on the organization's IS capabilities; each measure's reportable results; MRRV results; the results of any corrected programming logic, including corrections made to numerators, denominators, or sampling used for final measure calculation; and opportunities and recommendations for improvement of data completeness, data integrity, and health outcomes.

Information Systems Standards

Listed below are the Information Systems Standards published in NCQA's *HEDIS MY 2024 Compliance Audit: Standards, Policies, and Procedures, Volume 5*.

IS A—Administrative Data

IS A1 Data conform with industry standards and measure requirements.

IS A2 Data are complete and accurate.

IS A3 Membership information system enables measurement.

Rationale

The organization must capture all clinical information pertinent to the delivery of services to provide a basis for calculating measures. The audit process ensures that the organization consistently captures sufficient clinical information. Principal among these practices and critical for computing clinical measures is consistent use of standardized codes to describe medical events, including nationally recognized schemes to capture diagnosis, procedure, Diagnosis Related Group (DRG), and Diagnostic and Statistical Manual of Mental Disorders (DSM) codes. Standardized coding improves the comparability of measures through common definition of identical clinical events. The organization must cross-reference nonstandard coding schemes at the specific diagnosis and service level to attain equivalent meaning. The integrity of measures requires using standard forms, controlling receipt processes, editing and verifying data entry, and implementing other control procedures that promote completeness and accuracy in receiving and recording medical information. The transfer of information from medical charts to the organization's databases should be subject to the same standards for accuracy and completeness.

IS M—Medical Record Review Processes

- IS M1 Forms capture all fields relevant to measure reporting. Electronic transmission procedures conform to industry standards and have necessary checking procedures to ensure data accuracy (logs, counts, receipts, hand-off, and sign-off).
- IS M2 Retrieval and abstraction of data from medical records is reliably and accurately performed.
- IS M3 Data entry processes are timely and accurate and include sufficient edit checks to ensure accurate entry of submitted data in the files for measure reporting.
- IS M4 The organization continually assesses data completeness and takes steps to improve performance.
- IS M5 The organization regularly monitors vendor performance against expected performance standards.

Rationale

MRRV ensures that record abstraction performed by or on behalf of the entity meets standards for sound processes and that abstracted data are accurate. Validation includes not only an over-read of abstracted medical records, but also a review of MRR tools, policies, and procedures related to data entry and transfer, and training materials developed by or on behalf of the entity.

IS C—Clinical and Care Delivery Data

IS C1 Data capture is complete.

IS C2 Data conform with industry standards.

IS C3 Transaction file data are accurate.

IS C4 Organization confirms ingested data meet expectations for data quality.

Rationale

Organizations may use a supplemental database to collect and store data, which is then used to augment rates. These databases must be scrutinized closely since they can be standard, nonstandard, or member reported. The auditor must determine whether sufficient control processes are in place related to data collection, validation of data entry into the database, and use of these data. Mapping documents and file layouts may be reviewed as well, to determine compliance with this standard. Beginning with HEDIS 2014, NCQA provided new validation requirements for auditing supplemental data to ensure that all data included for reporting are complete and have required supporting documentation. Specific member information includes age, gender, benefits, product line (commercial, Medicaid, and Medicare), and the dates that define periods of membership so gaps in enrollment can be determined.

IS R—Data Management and Reporting

IS R1 The organization's data management enables measurement.

IS R2 Data extraction and loads are complete and accurate.

IS R3 Data transformation and integration is accurate and valid.

IS R4 Data quality and governance are components of the organization's data management.

IS R5 Oversight and controls ensure correct implementation of measure reporting software.

Rationale

Prior to data integration and reporting, it is essential that data transfer, consolidation, and control procedures support the integrity of the measure reporting. The organization's quality assurance practices and backup procedures serve as an organizational infrastructure supporting all information systems. The practices and procedures promote accurate and timely information processing and data protection in the event of a disaster. Calculating rates requires data from multiple sources. The systems used to assemble the data and to make the required calculations should be carefully constructed and tested. Data needed to calculate measures are produced by the organization's information systems and may be directly or indirectly affected by IS practices and procedures.