

980 PERFORMANCE IMPROVEMENT PROJECTS

REVISION DATES: 4/9/2025, 5/8/2024, 9/6/2023, 12/7/2022, 9/15/2021, 7/29/2020, 11/17/2017

REVIEW DATE: 11/18/2024

EFFECTIVE DATE: May 13, 2016

REFERENCES: 42 CFR 438.320, 42 CFR 438.330, AMPM 980 - Attachment A

PURPOSE

This policy establishes the requirements of the Division of Developmental Disabilities (Division) regarding the management and implementation of AHCCCS-Mandated and Division Self-Selected Performance Improvement Projects (PIPs) within the Quality Management/Performance Improvement (QM/PI) Program and its responsibilities to monitor, provide oversight and ongoing evaluation of the Administrative Services Subcontractors' (AdSS) performance.

DEFINITIONS

1. "Baseline Data" means data collected at the beginning of a PIP that is used as a starting point for measurement and the basis for comparison with subsequent remeasurement(s) in demonstrating Statistically Significant and sustained improvement.

2. "Benchmark" means the process of comparing a practice's performance with an external standard to motivate engagement in Quality improvement efforts and understand where performance falls in comparison to others. Benchmarks may be generated from similar organizations, Quality collaboratives, and authoritative bodies.
3. "Developmental Disability" or "DD" means as defined in A.R.S. § 36-551.
4. "Grievance" means a Member's expression of dissatisfaction with any matter, other than an adverse benefit determination.
5. "Measurable" means the ability to determine definitively whether or not a quantifiable Objective has been met, or whether progress has been made towards a positive outcome.
6. "Member" means the same as "Client" as defined in A.R.S. § 36-551.
7. "Methodology" means the planned documented process, steps, activities, or actions taken to achieve a goal or Objective, or to progress towards a positive Outcome.
8. "Monitoring" means the process of auditing, observing, evaluating, analyzing, and conducting follow-up activities, and

documenting results via desktop or on-site review.

9. "Objective" means a Measurable step, generally one of a series of progressive steps, to achieve a goal.
10. "Outcomes" means changes in patient health, functional status, satisfaction, or goal achievement that result from health care or supportive services.
11. "Performance Improvement Project" or "PIP" means a planned process of data gathering, evaluation and analysis to determine interventions or activities that are projected to have a positive Outcome. A PIP includes measuring the impact of the interventions or activities toward improving the Quality of care and service delivery. PIPs are designed to achieve Statistically Significant improvement, sustained over time, in health Outcomes and Member satisfaction, and include the elements outlined in 42 CFR 438.330(2). A PIP may also be referred to as a Quality Improvement Project (QIP).
12. "Performance Improvement/Quality Improvement" means the approach utilized to better services or Outcomes through the continuous improvement of processes to prevent or decrease the likelihood of issues. This is generally accomplished through

identifying areas of opportunity and testing new solutions or interventions to correct underlying causes of persistent/systemic issues or overcome identified barriers.

13. "Plan Do Study Act Cycle" or "PDSA Cycle" means a scientific method for testing a change or intervention, designed to result in improvement in a specific area. The cycle is completed by planning the change or intervention, implementing it, observing the results, and analyzing results for Outcomes on the interventions. When these steps are conducted over a relatively short time period, the approach is known as Rapid Cycle Improvement.
14. "Plan Do Study Act Method" or "PDSA Method" means a four-step model to test a change that is implemented. Going through the prescribed four steps utilizing one or more PDSA Cycles guides the thinking process into breaking down the task into steps and then evaluating the Outcome, improving on it, and testing again.
15. "Quality" as it pertains to external Quality review, means the degree to which an MCO increases the likelihood of desired Outcomes of its Members through:

- a. Its structural and operational characteristics.
 - b. The provision of services that are consistent with current professional, evidence-based knowledge.
 - c. Interventions for performance improvement.
16. “Statistically Significant” means a judgment of whether a result occurred because of chance. When a result is Statistically Significant, it means that it is unlikely that the result occurred because of chance or random fluctuation. There is a cutoff for determining statistical significance which is defined as the significance level. If the probability of a result (the significance value or p value) is less than the cutoff (the significance level), the result is judged to be Statistically Significant. Statistical significance is calculated utilizing the chi square Methodology, and a Statistically Significant result is defined as a p value less than or equal to 0.05.
17. “Validation” means the review of information, data, and procedures to determine the extent to which they are accurate, reliable, free from bias and in accordance with standards for data collection and analysis.

POLICY

A. PERFORMANCE IMPROVEMENT PROJECT REQUIREMENTS

1. The Division shall participate in AHCCCS-Mandated PIPs and conduct Division Self-Selected PIPs.
2. The Division shall participate in performance measures and PIPs that are mandated by the Centers for Medicare and Medicaid Services (CMS).

B. PERFORMANCE IMPROVEMENT PROJECT DESIGN

1. The Division shall conduct PIPs, including any PIPs required by AHCCCS and CMS, that focus on either clinical or non-clinical areas.
 - a. Clinical focus topics may include:
 - i. Primary, secondary, or tertiary prevention of acute conditions;
 - ii. Primary, secondary, or tertiary prevention of chronic conditions;
 - iii. Primary, secondary, or tertiary prevention of behavioral health conditions;
 - iv. Care of acute conditions;
 - v. Care of chronic conditions;

- vi. Care of behavioral health conditions; and
- vii. Continuity and coordination of care.
- b. Non-clinical focus topics may include:
 - i. Availability, accessibility, and adequacy of Contractor's service delivery system;
 - ii. Cultural competency of services;
 - iii. Interpersonal aspects of care or Quality of care/Member encounters; and
 - iv. Appeals, Grievances, and other complaints.
- 2. The Division shall identify and implement clinical and non-clinical focused PIPs that are meaningful to the population(s) served and based on self-identified opportunities for improvement.
- 3. The Division shall support identified PIPs by using:
 - a. Root cause analyses;
 - b. External and internal data;
 - c. Surveillance of trends; or
 - d. Other information available to the Division.
- 4. The Division shall ensure the volume of the eligible population included within the denominator would account for measurable improvement and allow for the Division to appropriately adhere

- to the protocol in AHCCCS' AMPM Attachment A.
5. The Division shall adhere to 42 CFR 438.330 and CMS External Quality Review (EQR) protocols when developing PIPs.
 6. The Division shall design PIPs to correct identified system issues or achieve improvement of health Outcomes or Member satisfaction, that is sustained over time, through:
 - a. Measurement of performance using objective Quality indicators;
 - b. Implementation of interventions to achieve improvement in the access to and Quality of care;
 - c. Evaluation of the effectiveness of the interventions based on indicators collected as part of the PIP; and
 - d. Planning and initiation of activities for increasing or sustaining improvement.
 7. The Division shall adhere to and align with the protocol specified in AMPM Policy 980 – Attachment A, when selecting, designing, developing, and implementing self-selected PIPs.
 8. The Division may identify and implement multiple Self-Selected PIPs, keeping the number of PIP indicators contained within a single PIP to four or fewer.

9. The Division shall use the PDSA Method to test interventions and refine them as necessary.
10. The Division shall utilize at least two PDSA Cycles within the PIP lifespan.
11. The Division shall include the following steps in the PDSA Cycle:
 - a. Plan: Plan the changes or interventions, including a plan for collecting data. State the Objectives of the interventions.
 - b. Do: Try out the interventions and document any problems or unexpected results.
 - c. Study: Analyze the data and study the results. Compare the data to predictions and summarize what was learned.
 - d. Act: Refine the changes or interventions, based on what was learned, and prepare a plan for retesting the interventions.
 - e. Repeat: Continue the cycle as new data becomes available until sustainable improvement is achieved.
12. The Division shall include all PDSA Cycles conducted as part of the PIP within the Division's PIP Report submissions.

C. PERFORMANCE IMPROVEMENT PROJECT TIMEFRAMES

1. For AHCCCS-Mandated PIPs, the Division shall do the following:
 - a. Initiate mandated PIPs on a date that corresponds with the calendar year established by AHCCCS.
 - b. Collect and analyze Baseline Data at the beginning of the PIP.
 - c. Implement innovative and evidence-based interventions to improve performance based on an evaluation of barriers and root cause analysis during the Intervention years or annual measurements.
 - d. Consider any unique factors for implementing interventions to improve performance.
 - e. Submit annual measurements to AHCCCS in order to demonstrate the Division meets required criteria for PIP closure.
 - f. Report to AHCCCS at the intervals indicated within the associated PIP methodologies in cases where AHCCCS elects to implement Rapid Cycle PIPs.
 - g. Continue to participate in the PIP until the Division demonstrates Statistically Significant and sustained

- improvement as determined by AHCCCS.
- h. The Division shall continue additional remeasurement year/period(s) if one or more PIP indicator does not demonstrate Statistically Significant and sustained improvement as determined by AHCCCS prior to the end of remeasurement year/period two until Statistically Significant improvement is demonstrated.
2. For Division Self-Selected PIPs, the Division shall do the following:
 - a. Implement Rapid Cycle PIPs where applicable and appropriate;
 - b. Align Self-selected PIP timelines with those indicated within the associated PIP initiation Notification submitted to and approved by AHCCCS;
 - c. Continue to participate in the PIP until the Division demonstrates Statistically Significant and sustained improvement for each included PIP indicator or as approved by AHCCCS when Statistically Significant and sustained improvement has not been demonstrated;
 - d. Continue remeasurement year/period if one or more PIP

indicator does not demonstrate Statistically Significant and sustained improvement prior to the end of remeasurement year/period two, the PIP indicator shall be continued for additional remeasurement year(s)/period(s) until Statistically Significant and sustained improvement is demonstrated; and

- e. Identify and implement a separate and distinct Self-Selected PIP that is active and within a Baseline, Intervention, Remeasurement one, or Remeasurement two measurement period during the same timeframe/reporting period as the additional remeasurement year/period three.

D. DATA COLLECTION METHODOLOGY

1. The Division shall align the data collection Methodology, including project indicators, procedures, and timelines with the guidance and direction provided for all AHCCCS-Mandated PIPs.
2. The Division shall evaluate the performance on the selected PIP indicators based on systematic, ongoing collection and analysis of accurate, valid, and reliable data as collected and reported by AHCCCS or as validated by the AHCCCS External Quality Review Organization (EQRO) through the Performance Measure

Validation process.

3. The Division shall ensure collected data are accurate, valid, and reliable through internal processes for Self-Selected PIPs that are not based on standardized performance measures.

E. INTER-RATER RELIABILITY

1. For PIPs that are not based on standardized performance measures, as well as performance measures not included within AHCCCS Contract, the Division shall:
 - a. Submit specific documentation to verify that indicator criteria were met in accordance with AHCCCS instruction;
 - b. Have qualified personnel collect the data; and
 - c. Implement inter-rater reliability if more than one person is collecting and entering data.
2. The Division shall verify that data collected from multiple parties or individuals for PIP indicators is consistent and comparable through an implemented inter-rater reliability process.
3. The Division shall contain in the documented inter-rater reliability process:
 - a. A detailed description of the Division's Methodology for conducting inter-rater reliability including:

- i. Initial training and retraining, if applicable;
 - ii. Oversight;
 - iii. Validation of data collection; and
 - iv. Other activities deemed applicable.
 - b. The required minimum score that each individual is required to obtain in order to continue participation in the data collection and reporting process;
 - c. A mechanism for evaluating individual accuracy scores and any subsequent accuracy scores, if applicable; and
 - d. The actions taken should an individual not meet the established accuracy score.
4. The Division shall monitor and track the inter-rater reliability accuracy scores and associated follow-up activities.
 5. The Division shall provide evidence to AHCCCS of implementation of the inter-rater reliability process as well as the associated Monitoring upon request.

F. MEASUREMENT OF SIGNIFICANT IMPROVEMENT

1. The Division shall implement interventions to achieve and sustain Statistically Significant improvement, followed by sustained improvement for one consecutive year/period, for each

PIP indicator.

2. The Division shall initiate interventions that result in Statistically Significant improvement in performance, that is sustained over time, for each of the PIP indicators being measured.
3. The Division shall provide evidence to AHCCCS of improvement in repeated measurements of the PIP indicators specified for each active PIP.
4. The Division shall demonstrate Statistically Significant improvement when improvement in the PIP indicator rate(s) from the baseline year/period to the first measurement year/period is Statistically Significant:
 - a. Intervention year/period PIP indicator rate(s) are not considered when determining Statistically Significant improvement.
 - b. When statistically significant improvement between the baseline year/period and the first remeasurement year/period is not demonstrated, significant improvement may be demonstrated when improvement in the PIP indicator rate(s) from the baseline measurement year/period to the second remeasurement year/period is

statistically significant.

5. The Division shall demonstrate sustained improvement when it:
 - a. Establishes how the Statistically Significant improvement can be attributable to the interventions implemented by the Division due to the efforts occurring as part of the PIP and its associated interventions versus another unrelated reason; and
 - b. Maintains, or increases, the improvements in performance for each PIP indicator for at least one remeasurement year/period after the Statistically Significant improvement in performance is first achieved.

G. PERFORMANCE IMPROVEMENT PROJECTS REPORTING REQUIREMENTS

1. The Division shall refer to the Resources, AHCCCS Guides - Manuals - Policies, Quality Management/Performance Improvement (QM/PI) Reporting Templates & Checklists section of the AHCCCS website to locate the associated tools for the Division to utilize when preparing and submitting the required PIP deliverables.
2. For AHCCCS-Mandated and Division Self-Selected PIPs, the

Division shall do the following:

- a. Align PIP deliverable submissions with the requirements outlined in:
 - i. The AHCCCS Contract;
 - ii. AMPM policy; and
 - iii. The PIP Deliverable Submission Overview tool and instructions found on the AHCCCS QM/PI Reporting Templates & Checklists webpage.
 - b. Ensure PIP deliverable submissions contain population-specific data, reflective of the Division's performance during the current and all previous reporting periods to include:
 - i. Baseline, intervention and remeasurement period rates;
 - ii. Results that are utilized as the basis for analysis, both quantitative and qualitative;
 - iii. The selection/modification of interventions; and
 - iv. Measurable outcomes of established interventions, project objectives and results of statistical testing.
3. The Division shall utilize the AHCCCS PIP Report Template

applicable to the population being reported.

4. The Division may utilize one PIP Report Template throughout the PIP lifecycle.
5. The Division shall complete and submit to AHCCCS a PIP Addendum as part of its PIP Report submission to capture any checklist items/requirements not included in the PIP Report Template utilized to report baseline year results to AHCCCS.
6. The Division shall complete and submit to AHCCCS an AHCCCS PIP Intervention & Analysis Template as a companion document to its PIP report submission.
7. The Division shall adhere to the instructions found in the AHCCCS PIP Intervention & Analysis template and ensure the most current template available on the AHCCCS QM/PI Reporting Templates & Checklists webpage is utilized for all submissions.
8. The Division shall ensure PIP reporting:
 - a. Includes subpopulation data and disparity analyses within its PIP reporting, with identification of targeted interventions to be implemented specific to findings; and
 - b. Aligns with the AHCCCS PIP Report and PIP Intervention & Analysis Template instructions.

- c. Conducts subpopulation data analysis of PIP indicator rates that includes members with special health care needs. This includes but is not limited to: Early and Periodic Screening Diagnosis and Treatment (EPSDT), maternal (pregnant and postpartum members), behavioral health category/diagnosis, and CRS-designated members, as appropriate and applicable to the PIP's eligible population(s).
9. For AHCCCS-Mandated PIPs, the Division shall:
 - a. Submit PIP reports as specified in the AHCCCS contract.
 - b. Report to AHCCCS rates and results reflective of combined Title XIX and Title XXI reporting as applicable to the population on the PIP Intervention & Analysis Template.
 - c. Indicate if the interventions are applicable to Title XIX, Title XXI, or both populations on the PIP Intervention & Analysis Template.
 - d. Submit a final PIP report and the completed AHCCCS PIP Intervention & Analysis Template, as specified in the AHCCCS contract, following the year/period in which Statistically Significant and sustained improvement is

- demonstrated.
- e. Evaluate Statistically Significant and sustained improvement based on PIP indicator rates that have been validated by the AHCCCS' EQRO or rates that are considered as the AHCCCS official PIP indicator rates, as specified in the AHCCCS Contract.
 - f. Evaluate Statistically Significant and sustained improvement based on the Division's internally collected and validated data for Self-Selected PIPs that are not based on AHCCCS required performance measures reflective of calendar year performance.
 - g. Utilize its remeasurement year/period two, or subsequent year/period, if required, PIP report to serve as their final PIP report submission contingent upon the following:
 - i. The Division has met the AHCCCS contract and policy criteria related to Statistically Significant and sustained improvement to support PIP closure, and
 - ii. The sections required as part of the final PIP report have been completed.
 - h. Keep AHCCCS-Mandated PIPs open until formal notification

of approval for PIP closure from AHCCCS is received.

- i. Resubmit their final PIP report if the AHCCCS PIP Checklist requirements are not met.

10. For Division Self-Selected PIPs, the Division shall:

- a. Submit a Contractor Self-Selected PIP Initiation Notification for AHCCCS' review and approval, as specified in the AHCCCS contract, for each newly identified PIP.
- b. Submit PIP reports for each Self-Selected PIP, active during the previous calendar year, as specified in the AHCCCS contract.
 - i. Indicate if the PIP indicator rates and results are reflective of combined Title XIX and Title XXI reporting, as applicable to population and associated PIP topic.
 - ii. Indicate if the interventions are applicable to the Title XIX, Title XXI, or both populations.
- f. Submit a final Self-Selected PIP report with the completed AHCCCS PIP Intervention & Analysis Template, as specified in the AHCCCS contract, following the year in which statistically Significant and sustained improvement is

demonstrated.

- g. Evaluate Statistically Significant and sustained improvement based on PIP indicator rates that have been validated by AHCCCS' EQRO or considered as the AHCCCS official performance measure rates, as specified in the AHCCCS contract.
- h. Evaluate Statistically Significant and sustained improvement based on the Division's internally collected and validated data for self-selected PIPs that are not based on standardized performance measures and calendar year performance.
- i. Utilize its remeasurement year/period two or subsequent year/period, if required, PIP report to serve as their final PIP report submission to AHCCCS contingent upon the following:
 - i. The Division has met the AHCCCS contract and policy criteria related to Statistically Significant and sustained improvement to support PIP closure; and
 - ii. The sections required as part of the final PIP report have been completed.

- j. Keep Division Self-Selected PIPs open until the Division has met criteria related to Statistically Significant and sustained improvement.
- k. Submit a PIP Closure Request for each PIP they are requesting to close for AHCCCS' review and approval.
- l. Indicate the rationale for closing a PIP in cases where the Division has not met criteria related to Statistically Significant and sustained improvement to support PIP closure for each included PIP indicator.
- m. Close the PIP when formal notification of approval for PIP closure has been received from AHCCCS.
- n. Resubmit their final PIP report if the AHCCCS PIP Checklist requirements are not met.

H. DIVISION OVERSIGHT AND MONITORING OF ADSS

- 1. The Division shall ensure the AdSS are compliant with Division and AHCCCS Mandated PIPs and the AdSS Self-Selected PIPs according to Policy and Contract.
- 2. The Division shall provide oversight and monitoring of the AdSS' PIPs through:
 - a. Monitoring compliance in accordance with AdSS Policy 980;

Quality Management and Performance Improvement Program

- b. Ensure accuracy, timeliness, and completion of PIP submissions in accordance with Policy and Contract Chart of Deliverables.
- c. Elevate non-compliance to the local Chief Medical Officer, QM Medical Director, and Chief Quality Officer for review and remediation:
 - i. Referral to the Performance Improvement Committee and QM/PI Committee for ongoing monitoring; and
 - ii. Implementation of a Corrective Action Plan as applicable and appropriate.



Signature of Chief Medical Officer

Anthony Dekker

Name

Apr 8, 2025

Date