



# **Rhode Island Medicaid Managed Care Program Neighborhood Health Plan of Rhode Island, Inc.**

## **2020 External Quality Review Annual Technical Report**

**April 2022**

Prepared on behalf of:  
The State of Rhode Island  
Executive Office of Health and Human Services

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# I. Executive Summary

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## Introduction

The Balanced Budget Act (BBA) of 1997 established that state agencies contracting with managed care plans (MCPs) provide for an annual external, independent review of the quality outcomes, timeliness of and access to the services included in the contract between the state agency and the MCP. *Title 42 Code of Federal Regulations (CFR) Section (§) 438.350 External quality review (a) through (f)* sets forth the requirements for the annual external quality review (EQR) of contracted MCPs. States are required to contract with an external quality review organization (EQRO) to perform an annual EQR for each contracted MCP. The states must further ensure that the EQRO has sufficient information to carry out this review, that the information be obtained from EQR-related activities and that the information provided to the EQRO be obtained through methods consistent with the protocols established by the Centers for Medicare and Medicaid Services<sup>1</sup> (CMS). Quality, as it pertains to an EQR, is defined in *42 CFR § 438.320 Definitions* as “the degree to which an MCO<sup>2</sup>, PIHP<sup>3</sup>, PAHP<sup>4</sup>, or PCCM<sup>5</sup> entity increases the likelihood of desired health outcomes of its enrollees through: (1) its structural and operational characteristics. (2) The provision of health services that is consistent with current professional, evidence-based knowledge. (3) Interventions for performance improvement.”

The standards of *42 CFR § 438.364 External review results (a) through (d)* requires that the annual EQR be summarized in a detailed technical report that aggregates, analyzes and evaluates information on the quality, timeliness, and access to health care services that MCPs furnish to Medicaid recipients. The report must also contain an assessment of the strengths and weaknesses of the MCPs regarding health care quality, timeliness, and access, as well as make recommendations for improvement.

To comply with these requirements, the State of Rhode Island Executive Office of Health and Human Services (EOHHS) contracted with Island Peer Review Organization (IPRO) to assess and report the impact of its Medicaid program on the quality, timeliness, and accessibility of health services. Specifically, this report provides IPRO’s independent evaluation of the services provided by Neighborhood Health Plan of Rhode Island, Inc. (Neighborhood), a Rhode Island Medicaid MCP.

It is important to note that the provision of health care services to each of the applicable eligibility groups (Core Rite Care, Rite Care for Children with Special Health Care Needs [CSHCN], Rite Care for Children in Substitute Care<sup>6</sup>, Rhody Health Partners [RHP], Rhody Health Options [RHO]<sup>7</sup>, and Rhody Health Expansion [RHE]) is evaluated in this report. RHP is a managed care option for Medicaid-eligible adults with disabilities, while RHO members include those that are dual-eligible for Medicaid and Medicare. The RHE population includes Medicaid-eligible adults, ages 19 to 64 years, who are not pregnant, not eligible for Medicare Parts A or B, and are not otherwise eligible for

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<sup>1</sup> Centers for Medicare and Medicaid Services Website: <https://www.cms.gov/>

<sup>2</sup> Managed Care Organization

<sup>3</sup> Prepaid Inpatient Health Plan

<sup>4</sup> Prepaid Ambulatory Health Plan

<sup>5</sup> Primary Care Case Management

<sup>6</sup> Neighborhood is the only Health Plan that serves the Children in Substitute Care population.

<sup>7</sup> Neighborhood is the only Health Plan that serves the Rhody Health Options population.

mandatory coverage under the state plan. As members of the Medicaid MCPs, each of these populations were included in all measure calculations, where applicable. For comparative purposes, results for MY 2018 and MY 2019 are displayed when available and appropriate. The framework for this assessment is based on the guidelines established by the CMS EQR protocols, as well as state requirements.

## Rhode Island Medicaid Managed Care Program

RIte Care, Rhode Island's Medicaid managed care program for children, families, and pregnant women, began enrollment in August 1994. RIte Care operates as a component of the State's Global Consumer Choice Compact Waiver Section 1115(a) demonstration project, which was approved through December 31, 2023<sup>8</sup>. In 2020 Rhode Island contracted with three MCPs and one dental MCP deliver health care services to Medicaid beneficiaries.

## Scope of External Quality Review Activities

This report focuses on the four federally mandatory EQR activities (validation of performance improvement projects [PIPs], validation of performance measures, review of compliance with Medicaid standards, and validation of network adequacy) and one optional EQR activity (validation of quality-of-care surveys) that were conducted. It should be noted that validation of provider network adequacy was instructed at the state's discretion as activity protocols were not included in the CMS *External Quality Review (EQR) Protocols* published in October 2019. As set forth by 42 CFR § 438.358 *Activities related to external quality review (b)(1)* EQR activities are:

- (i) **Validation<sup>9</sup> of Performance Improvement Projects (Protocol 1)** – This activity validates that MCP PIPs were designed, conducted, and reported in a methodologically sound manner, allowing for real improvements in care and services. (Note: Rhode Island refers to PIPs as Quality Improvement Projects [QIPs] and the term QIP will be used in the remainder of this report.)
- (ii) **Validation of Performance Measures (Protocol 2)** – This activity assesses the accuracy of MCP reported performance measures and determines the extent to which the performance measures follow state specifications and reporting requirements.
- (iii) **Compliance Monitoring (Protocol 3)** – This activity determines MCP compliance with its contract and with state and federal regulations.
- (iv) **Validation of Network Adequacy (Protocol 4)** – This activity assesses MCP adherence to state standards for time and distance for specific provider types, as well as the MCP's ability to provide timely care. (CMS has not published an official protocol for this activity.)
- (v) **Validation of Quality-of-Care Surveys (Protocol 6)** – The activity assesses MCP compliance with contractual requirements to evaluate member and provider satisfaction annually.

The validation results of these EQR activities are reported in the **High-Level Conclusions and Findings** subsection that immediately follows.

While the CMS *External Quality Review (EQR) Protocols* published in October 2019 stated that an Information Systems Capabilities Assessment (ISCA) is a required component of the mandatory EQR activities, CMS later clarified

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<sup>8</sup> In December 2019, the renewal request submitted by EOHHS was approved by CMS, resulting in an extension of the State's Global Consumer Choice Compact Waiver Section 1115(a) through December 31, 2023.

<sup>9</sup> CMS defines validation at 42 CFR § 438.320 *Definitions* as "the review of information, data, and procedures to determine the extent to which they are accurate, reliable, free from bias, and in accord with standards for data collection and analysis."

that the systems reviews that are conducted as part of the National Committee of Quality Assurance (NCQA) HEDIS Compliance Audit™ may be substituted for an ISCA. Findings from IPRO's review of Neighborhood's HEDIS final audit report (FAR) for MY 2020 are in the **Validation of Performance Measures** subsection of **Section V** of this report.

## High-Level Conclusions and Findings

### Validation of Quality Improvement Projects

IPRO's validation of Neighborhood's 2020 QIPs confirmed the state's compliance with the standards of *42 CFR § 438.330(a)(1)*. The results of the validation activity determined that Neighborhood was compliant with the standards of *42 CFR § 438.330(d)(2)* for all six QIPs. IPRO's assessment of Neighborhood methodology found that there were no validation findings that indicated that the credibility of QIP results were at risk.

Concerning child and adolescent access to PCPs, Neighborhood's performance fluctuated between the baseline and 2020 remeasurement periods. As of MY 2020, Neighborhood did not demonstrate an increase in child and adolescent access to primary care and did not achieve the goal rate for either of the two performance indicators.

Concerning childhood developmental screenings, Neighborhood's performance fluctuated between the baseline and MY 2020 remeasurement periods. As of MY 2020, Neighborhood demonstrated an increase at screening for developmental, behavioral, and social delays at one year, two years, and three years of age. Neighborhood exceeded goal rates for all three performance indicators.

Concerning follow-up care for children on attention deficit/hyperactivity disorder (ADHD) medication, Neighborhood's performance fluctuated between the baseline and MY 2020 remeasurement periods. As of MY 2020, Neighborhood demonstrated improved performance in appropriate follow-up care for children newly prescribed ADHD medication during the initial and continuation phases, but the MCP did not meet the goal rates for either of the two performance indicators.

Concerning lead screening, Neighborhood's performance fluctuated between the baseline and MY 2020 remeasurement periods but remained the baseline rate. As of MY 2020, Neighborhood demonstrated performance decline in the number of children screened for lead and did not meet the goal rate.

Concerning care for older adults, Neighborhood's performance demonstrated gradual improvement between the baseline and MY 2019 remeasurement periods, and then demonstrated notable declines in MY 2020. Despite the decline in performance, MY 2020 rates were higher than the baseline rates. Neighborhood demonstrated performance improvement and met goal rates for advanced care plans and pain assessments. Neighborhood did not meet goal rates for medication reviews and functional assessments.

Concerning transitions of care, Neighborhood's performance fluctuated between the baseline and MY 2020 remeasurement periods. As of MY 2020, Neighborhood increased the number of Rhode to Home Program (RTHP) eligible members who transitioned from a nursing facility to the community but did not meet the goal in 2020. Neighborhood's MY 2020 reported a higher number of transitions from a nursing facility to the community for all members between. (The goal rate established by Neighborhood for transitions for all members was lower than the baseline rate.)

QIP summaries and detailed validation results are in **Section V** of this report.

## Validation of Performance Measures

IPro's validation of Neighborhood's performance measures confirmed the state's compliance with the standards of 42 CFR § 438.330(a)(1). The results of the validation activity determined that Neighborhood was compliant with the standards of 42 CFR § 438.330(c)(2).

## Information Systems Capabilities Assessment

The HEDIS MY 2020 FAR produced by Attest Health Care Advisors indicated that Neighborhood met all requirements to successfully report HEDIS data to EOHHS and to NCQA.

## HEDIS Performance

Unless otherwise noted, the benchmarks referenced below derive from NCQA's 2021 *Quality Compass* MY 2020 for Medicaid (National – All Lines of Business [excluding PPOs and EPOs]) and represent the performance of all health plans that reported Medicaid HEDIS data to NCQA for HEDIS MY 2020.

Concerning the Use of Services measures evaluating child and adolescent access to primary care, all three MY 2020 rates reported by Neighborhood exceeded the national Medicaid mean. One MY 2020 rate performed at the 95th percentile, one rate performed at the 90th percentile, and one rate performed at the 66.67th percentile.

Concerning the Effectiveness of Care measures evaluating preventive screenings and care for members with acute and chronic illness, six of seven MY 2020 rates reported by Neighborhood exceeded the national Medicaid mean. Three MY 2020 rates performed at the 95th percentile, one rate performed at the 90th percentile, two rates performed at the 75th percentile, and one rate performed at the 25th percentile.

Concerning Access and Availability, the five rates reported by Neighborhood exceeded the national Medicaid mean. One MY 2020 rate performed at the 95th percentile, one MY 2020 rate performed at the 90th percentile, one MY 2020 rate performed at the 75th percentile, one MY 2020 rate performed at the 66.67th percentile, and one MY 2020 rate performed at the 25th percentile.

All HEDIS performance measure rates are reported in **Section V** of this report.

## PGP Performance

For the 2020 PGP (MY 2019), Neighborhood reported 22 rates related to utilization, access to care, prevention and screening, women's health, chronic care, and behavioral health.

Benchmarks referenced in the evaluation of PGP results derive from NCQA's 2020 *Quality Compass* MY 2019 for Medicaid (National – All Lines of Business [excluding PPOs and EPOs]) and represent the performance of all MCPs that reported Medicaid HEDIS data to NCQA for HEDIS MY 2019.

Neighborhood reported one 2020 PGP rate that benchmarked at the national Medicaid 95th percentile and five 2020 PGP rates that benchmarked at the national Medicaid 90th benchmark. Measures were related to well-child visits, prenatal care, cervical cancer screening, diabetes care, follow-up care after hospitalization for mental illness, and medication adherence.

Six 2020 PGP rates benchmarked at the national Medicaid 75th percentile. Measures were related to child and adolescent access to primary care, immunizations for children and adolescents, diabetes care, follow-up care after hospitalization for mental illness.



All other 2020 PGP rates performed below the national Medicaid 75th percentile. Measures were related to well-child visits, chlamydia screening, behavioral health medication management, and use of opioids.

All PGP performance measure rates are reported in **Section V** of this report.

## Review of Compliance with Medicaid and CHIP Managed Care Regulations

IPRO's review of the results of Neighborhood's most recent NCQA accreditation review confirmed the state's compliance with evaluating MCP adherence to the standards of *42 CFR Part 438 Subpart D* and *42 CFR Part 438 Subpart E § 438.330*. Neighborhood met all federal Medicaid standards.

Detailed results of the MCP's compliance review are in **Section V** of this report.

## Validation of Network Adequacy

IPRO's review of Neighborhood's network evaluation reports confirmed the state's compliance with the requirements of *42 CFR § 438.68 Network adequacy standard (a) and (b)*. In the absence of a CMS protocol for *42 CFR § 438.358 Activities related to external quality review (b)(1)(iv)*, IPRO assessed Neighborhood's compliance with the state-established standards for appointments and time and distance.

In July 2020, Neighborhood met geographic access standards for the provider types reviewed for approximately 100% of its Medicaid membership.

Neighborhood monitored appointment availability during 2020 using the EOHHS-prescribed secret shopper methodology and reporting template. The reported mean for urgent adult specialty care did not meet the 24-hour standard for any specialty evaluated, however the reported mean for urgent pediatric specialty care met the 24-hour standard for all specialties evaluated. The mean number of days for routine adult behavioral health care met the 10-calendar day standard.

Detailed results of network adequacy assessments are reported in **Section V** of this report.

## Validation of Quality of Care Surveys

### Member Satisfaction

Section 2.13.05 of the Contract requires each MCP to annually collect member satisfaction data. IPRO's review of available documentation confirmed Neighborhood's compliance with Section 2.13.05. Neighborhood evaluated member satisfaction with services received in MY 2020 using NCQA's Consumer Assessment of Healthcare Providers and Systems (CAHPS) Adult Medicaid 5.1H survey tool and Child Medicaid 5.1H survey tool.

The benchmarks referenced immediately below derive from NCQA's *2021 Quality Compass* MY 2020 for Medicaid (National – All Lines of Business [excluding PPOs and EPOs]) and represent the performance of all health plans that reported Medicaid HEDIS data to NCQA for HEDIS MY 2020.

Adult member satisfaction with care received and MCP services in MY 2020 was similar to member satisfaction in MY 2019. Of the eight adult satisfaction measures with available benchmarks, Neighborhood achieved six MY 2020 scores that performed above the national Medicaid mean. Of the remaining scores, one score performed at the 50th percentile and two scores performed at the 33.33rd percentile.

For the child satisfaction survey, four MY 2020 scores were not reported due to small sample sizes. Of the remaining four scores, Neighborhood achieved one MY 2020 score that performed above the national Medicaid mean. The other measures had scores reported at 33.33rd, 10th and 5th percentiles.

Detailed results of the member satisfaction survey are reported in **Section V** of this report.

### Provider Satisfaction

Section 2.13.06 of the Contract requires each MCP to annually collect provider satisfaction data. IPRO's review of available documentation confirmed Neighborhood's compliance with Section 2.13.05. Overall, MY 2020 satisfaction with Neighborhood increased significantly from MY 2019. Provider satisfaction levels improved across all Neighborhood-specific measures, with nearly half of the increases from MY 2019 to MY 2020 being statistically significant. This finding differs greatly from the 2019 survey results in which all measures had declined from 2018.

Qualitative feedback suggested improved satisfaction with Neighborhood's responsiveness, online tools, and claims processing.

Satisfaction with provider relations was identified as an area needing improvement.

Detailed results of the provider satisfaction survey are reported in **Section V** of this report.

### Recommendations

Per 42 CFR § 438.364 *External quality review results (a)(4)*, this report is required to include recommendations for improving the quality of care health care services furnished by Neighborhood and recommendations on how EOHHS can target the goals and the objectives outlined in the state's quality strategy to better support improvement in the **quality** of, **timeliness** of, and **access** to health care services furnished to Rhode Island Medicaid managed care enrollees.

### EQR Recommendations the Rhode Island Executive Office of Health and Human Services

Recommendations towards achieving the goals of the Medicaid quality strategy are presented in **Section III** of this report.

### EQR Recommendations for Neighborhood Health Plan of Rhode Island, Inc.

MCP-specific recommendations related to the **quality** of, **timeliness** of and **access** to care are in **Section VIII** of this report.

## II. Introduction

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States that provide Medicaid services through contracts with MCPs are required by federal mandate to conduct EQR activities and ensure that the results of those activities are used to perform an external, independent assessment and produce an annual report. EOHHS contracts with IPRO to serve as its EQRO. As part of this agreement, IPRO performs an independent annual analysis of state and MCP performance related to the **quality**, **timeliness**, and **accessibility** of the care and services it provides. This report is the result of IPRO's evaluation and review of activities in 2020.

### III. Rhode Island Medicaid Managed Care

#### Rhode Island Medicaid Managed Care Program

The state's initial Medicaid and CHIP managed care program, Rite Care, began in 1994. The Rite Care program covered children, families, and pregnant women, and began enrollment in August 1994 as a Section 1115 demonstration. Since 1994, the Rhode Island has expanded the Medicaid managed care program. **Table 1** displays the timeline for Rhode Island's Managed Care Program additions.

**Table 1: Rhode Island Medicaid Managed Care Program Additions**

Year	Managed Care Program Additions
1994	Rite Care, SCHIP
2000	Children in Substitute Care, Rite Share
2003	Children with Special Needs, Rite Smiles
2008	Rhody Health Partners
2014	Medicaid Expansion, Behavioral Health carved in to managed care
2015	Accountable Entities Pilot
2016	Medicare-Medicaid Plan (MMP)
2018	MCP-Certified Accountable Entities APMs

Rite Care operates as a component of the State's Global Consumer Choice Compact Waiver Section 1115(a) demonstration project, which was approved through December 31, 2019<sup>10</sup>. As is typical for Section 1115 waivers, CMS defined "Special Terms and Conditions" (STCs) for the demonstration. The STCs addressing quality assurance and improvement were as follows:

Contracted MCPs enroll members into the following lines of business: Rite Care Core (children and families); Rite Care Substitute Care (children in substitute care); Rite Care CSHCN (children with special healthcare needs); Rhody Health Expansion (low-income adults without children); Rhody Health Partners (aged, blind, disabled adults). The contracted dental plan enrolls members into the Rite Smiles program.

Rhode Island EOHHS contracts with three MCPs: Neighborhood Health Plan of Rhode Island (Neighborhood); UnitedHealthcare Community Plan of Rhode Island (UHCCP-RI), and Tufts Health Public Plan; and one managed dental health plan: United Healthcare Dental (UHC-Dental).

#### 2019 State Medicaid Quality Strategy

For over 25 years, Rhode Island has utilized managed care as a strategy for improving access, service integration, quality and outcomes for Medicaid beneficiaries while effectively managing costs. To achieve its goals for improving the quality and cost-effectiveness of Medicaid services for beneficiaries, the contracted Managed Care Entities (MCEs) program have the following responsibilities:

- ensuring a robust network beyond safety-net providers and inclusive of specialty providers,
- increasing appropriate preventive care and services, and

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<sup>10</sup> In December 2018, the renewal request submitted by EOHHS was approved by CMS, resulting in an extension of the State's Global Consumer Choice Compact Waiver Section 1115(a) through December 31, 2023.

- assuring access to care and services consistent with the state Medicaid managed care contract standards, including for children with special health care needs.

## Guiding Principles, Goals and Objectives

Rhode Island's Medicaid managed care program is dedicated to improving the health outcomes of the state's diverse Medicaid and CHIP population by providing access to integrated health care services that promote health, well-being, independence, and quality of life. A working group was established to present innovative recommendations to modernize the state's Medicaid program and increase efficiency. The four guiding principles established by the Working Group are:

1. pay for value, not volume,
2. coordinate physical, behavioral, and long-term health care,
3. rebalance the delivery system away from high-cost settings, and
4. promote efficiency, transparency, and flexibility.

Rhode Island Medicaid also developed the Accountable Entity (AE) program as a core part of its managed care quality strategy which are Rhode Island's version of an accountable care organization. AEs represent interdisciplinary partnership among providers in primary care that also work to address services outside of the traditional medical model which includes behavioral health and social support services. The AE initiative focuses on achieving the following goals:

- Transition Medicaid from fee for service to value-based purchasing at the provider level
- Focus on Total Cost of Care (TCOC)
- Create population-based accountability for an attributed population
- Build interdisciplinary care capacity that extends beyond traditional health care providers
- Deploy new forms of organization to create shared incentives across a common enterprise, and
- Apply emerging data capabilities to refine and enhance care management, pathways, coordination, and timely responsiveness to emergent needs.

Evolving from the state's guiding principles, Rhode Island Medicaid established eight core goals for its Managed Care Quality Strategy from 2019-2022. These goals are displayed in **Table 2**.

**Table 2: Rhode Island Medicaid Quality Strategy Goals, 2019-2022**

Rhode Island Medicaid Goals	
1.	Maintain high level managed care performance on priority clinical quality measures
2.	Improve managed care performance on priority measures that still have room for improvement
3.	Improve perinatal outcomes
4.	Increase coordination of services among medical, behavioral, and specialty services and providers
5.	Promote effective management of chronic disease, including behavioral health and comorbid conditions
6.	Analyze trends in health disparities and design interventions to promote health equity
7.	Empower members in their healthcare by allowing more opportunities to demonstrate a voice and choice
8.	Reduce inappropriate utilization of high-cost settings

To support achievement of the Quality Strategy goals, Rhode Island Medicaid established specific objectives. The state developed these objectives to focus state, MCE, and other activities on interventions likely to result in progress toward the eight managed care goals. These objectives are displayed in **Table 3** along with the attached goal(s).

**Table 3: Rhode Island Managed Care Quality Objectives**

	Goal	Goal	Goal	Goal	Goal	Goal	Goal	Goal
Objectives	1	2	3	4	5	6	7	8
Continue to work with MCEs and the EQRO to collect, analyze, compare, and share clinical performance and member experience across plans and programs.	X	X	X	X	X	X	X	X
Work collaboratively with MCPs, AEs, OHIC and other stakeholders to strategically review and modify measures and specifications for use in Medicaid managed care quality oversight and performance incentives. Establish consequences for declines in MCE performance.	X							
Create non-financial incentives such as increasing transparency of MCE performance through public reporting of quality metrics & outcomes – both online & in person.	X	X						
Review and potentially modify financial incentives (rewards and/or penalties) for MCP performance to benchmarks and improvements over time.	X	X	X	X	X			
Work with MCPs and AEs to better track and increase timely, appropriate preventive care, screening, and follow up for maternal and child health.			X			X		X
Incorporate measures related to screening in managed care and increase the use of screening to inform appropriate services.			X	X	X	X		X
Monitor and assess MCP and AE performance on measures that reflect coordination including: follow up after hospitalization for mental health and data from the new care management report related to percentage/number of care plans shared with PCPs.				X	X			X
Develop a chronic disease management workgroup and include state partners, MCEs, and AEs, to promote more effective management of chronic disease, including behavioral health and co-morbid conditions.					X			X
Review trend for disparity-sensitive measures and design interventions to improve health equity, including working with MCPs and AEs to screen members related to social determinants of health and make referrals based on the screens.						X		
Share and aggregate data across all Rhode Island HHS agencies to better address determinants of health. Develop a statewide workgroup to resolve barriers to data-sharing.						X		
Continue to require plans to conduct CAHPS 5.0 surveys and annually share MCP CAHPS survey results with the MCAC.							X	
Explore future use of a statewide survey to assess member satisfaction related to AEs, such as the Clinician Group (CG-CAHPS) survey for adults and children receiving primary care services from AEs.							X	
Explore use of focus groups to solicit additional member input on their experiences & opportunities for improvement.							X	

## Improvement and Interventions

To ensure that incentive measures, changes to the delivery system, and related activities result in improvement related to the vision and mission, Rhode Island Medicaid engages in multiple interventions. These interventions are based on the results of its MCE assessment activities and focus on the managed care goals and objectives displayed in **Table 3**. Rhode Island Medicaid's ongoing and expanded interventions for managed care quality and performance improvement include:

- **Ongoing requirements for MCEs to be nationally accredited:** Rhode Island Medicaid MCPs are required to obtain and maintain NCQA accreditation and to promptly share its accreditation review results and notify the state of any changes in its accreditation status.
- **Tracking participation in APMs related to value-based purchasing (pay for value not volume):** Medicaid MCPs are required to submit reports on a quarterly basis that demonstrate their performance in moving towards value-based payment models, including the Alternate Payment Methodology (APM) Data Report, Value Based Payment Report and Accountable Entity-specific reports.
- **Pay for Performance Incentives for MCEs and AEs:** Rhode Island Medicaid intends to create non-financial incentives such as increasing transparency of MCE performance through public reporting of quality metrics and outcomes – both online and in person.
- **Statewide collaboratives and workgroups that focus on quality of care:** Rhode Island Medicaid works with MCEs and the EQRO to collect, analyze, compare, and share quality and other performance data across plans and programs to support ongoing accountability and performance improvement.
- **Soliciting member feedback through a variety of forums and mechanisms:** Rhode Island Medicaid will require, compare, and share member experience data to support ongoing managed care accountability and performance improvement.

Refer to **Appendix B** of this report for the full *2019-2022 Rhode Island State Medicaid Quality Strategy*.

## IPRO's Assessment of the Rhode Island Medicaid Quality Strategy

The EOHHS Medicaid quality strategy aligns with CMS's requirements and provides a framework for MCPs to follow while aiming to achieve improvements in the quality of, timeliness of and access to care. In addition to conducting the required EQR activities, EOHHS's quality strategy includes state- and MCP-level activities that expand upon the tracking, monitoring, and reporting of performance as it relates to the Medicaid service delivery system.

## Recommendations to the Rhode Island Executive Office of Health and Human Services

In working towards the goals of the 2019-2022 strategy, IPRO recommends that the EOHHS consider:

- Establishing appointment availability thresholds for the Medicaid Managed Care program to hold the MCPs accountable for increasing the availability of timely appointments.
- Updating the Medicaid quality strategy to explicitly state how performance towards the goals will be evaluated. Each goal should be attached to an outcome measure along with baseline and target rates. Interim reporting of rate performance should be provided to the EQRO as part of the annual EQR assessment.
- Developing a separate quality strategy for the dental Medicaid managed care program or dedicate a section in the overall Medicaid quality strategy to Rite Smiles.
- Identify opportunities to support the expansion of telehealth capabilities and member access to telehealth services across the state.

## IV. Neighborhood Health Plan of Rhode Island, Inc.

Neighborhood is a not-for-profit HMO that served the Medicaid populations. Neighborhood served the following eligibility groups: Core Rite Care, Rite Care for Children with Special Health Care Needs, Rhody Health Partners, and Rhody Health Expansion.

**Table 4** displays Neighborhood enrollment for year-end 2018 through year-end 2020, as well as the percent change in enrollment each year, according to data reported to Rhode Island Medicaid. The data presented may differ from those in prior reports as enrollment counts will vary based on the point in time in which the data were abstracted. Neighborhood's enrollment increased 12% from 160,572 members in 2019 to 179,049 members in 2020.

**Table 4: Neighborhood's Enrollment, 2018-2020**

Eligibility Group	2018	2019	2020
Core Rite Care	100,923	93,611	100,594
Children with Special Health Care Needs <sup>1</sup>	5,066	5,119	5,237
Children in Substitute Care <sup>2</sup>	2,715	2,616	2,879
Extended Family Planning <sup>3</sup>	829	1,265	1,240
Rhody Health Partners <sup>4</sup>	7,465	7,446	7,497
Rhody Health Options <sup>5</sup>	15,698	13,875	12,914
Rhody Health Expansion <sup>6</sup>	38,135	36,640	48,688
<b>Medicaid Total</b>	<b>170,831</b>	<b>160,572</b>	<b>179,049</b>
<b>Percent Change from Previous Year</b>	<b>-7%</b>	<b>-6%</b>	<b>+12%</b>

<sup>1</sup> Children with Special Health Care Needs (CSHCN) were enrolled in Rite Care on a voluntary basis, effective 01/29/2003, because only one Health Plan was willing to enroll this population. As of 10/01/2008, managed care enrollment became mandatory for all Rite Care-eligible CSHCN who do not have another primary health insurance coverage. All of the State's current Medicaid-participating Health Plans serve CSHCN.

<sup>2</sup> Appendix B of this report describes the eligibility criteria for Rhody Health Partners.

<sup>3</sup> Rhody Health Expansion serves Medicaid-eligible adults ages 19-64 who are not pregnant, not eligible for Medicare Parts A or B, and are not otherwise eligible or enrolled for mandatory coverage.

<sup>4</sup> Enrollment in the DSNP population began on 01/01/2019.

<sup>5</sup> The EFP population includes women who lose Medicaid coverage at 60 days postpartum who do not have access to creditable health insurance.

### Neighborhood's 2020 Quality Improvement Program

The EOHHS requires that contracted health plans have a written quality assurance or quality management plan that monitors, assures, and improves the quality of care delivered over a wide range of clinical and health service delivery areas, including all subcontractors. Emphasis shall be placed on, but need not be limited to, clinical areas relating to management of chronic disease, mental health and substance abuse care, members with special needs, and access to services for members. Neighborhood's *2020 Quality Improvement Plan* meets these requirements.

### Objectives and Goals

The overall goal of Neighborhood's QI Program is to ensure that members have access to high quality health care services that are responsive to their needs and result in positive health outcomes.

**Table 5** displays Neighborhood's QI goals as reported in the *2020 Quality Improvement Plan*, revised May 2020.



**Table 5: Neighborhood's Quality Improvement Goals, 2020**

Quality Improvement Goals	
1.	Assure access to high quality medical and behavioral healthcare
2.	Support members with acute and long-term health care needs
3.	Monitor and improve coordination of care across settings
4.	Improve member and provider experience
5.	Ensure the safety of members in all health care settings
6.	Monitor quality of care in nursing facilities through Minimum Data Set (MDS) data and other data sources
7.	Engage members in their own care
8.	Improve HEDIS and CAHPS performance
9.	Improve Medicare Health Outcomes Survey (HOS) performance
10.	Achieve maximum NCQA Star Rating and Accreditation Status
11.	Achieve maximum performance under the RI Medicaid Performance Goal Program
12.	Achieve optimum performance for Quality Withhold under the INTEGRITY Medicare-Medicaid Plan (MMP) product line
13.	Achieve maximum performance in the quality improvement projects required by contracts for Medicaid, INTEGRITY-MMP, and the Exchange products
14.	Maintain grievance and appeal procedures and mechanisms and assure that members can achieve resolution to problems or perceived problems relating to access and other quality issues
15.	Maintain collaborative relationships with network providers and state agencies
16.	Improve operational efficiency in the work performed across the organization
17.	Ensure Neighborhood's quality improvement structure and processes adhere to NCQA standards and state and federal requirements
18.	Assess the QI Program annually and make changes as necessary to improve program effectiveness

### Quality Improvement Program Activities

Neighborhood's QI program activities involve a variety of mechanisms to measure and evaluate the total scope of services provided to enrollees. The framework for program activities may vary and may include but is not limited to, the following functions:

- Clinical Quality Performance Indicators: HEDIS
- Member Satisfaction: CAHPS Member Satisfaction Surveys
- Member Satisfaction: Care Management Member Satisfaction Survey
- Provider Satisfaction Survey
- Clinical Practice Guidelines
- Disease Management and Wellness
- Peer Review Activity
- Actions to Address Quality of Care Complaints
- Quality Improvement Projects
- Chronic Care Improvement Programs (CCIP) – INTEGRITY MMP
- Activities to Improve Patient Safety
- Objectives to Enhance Service to a Culturally Diverse Membership
- Objectives to Enhance Services to Members with Complex Health Needs
- Population Health Management Strategy (PHMS)
- Annual Evaluation and Work Plan Development

## Quality Improvement Program Oversight

Neighborhood's Chief Medical Officer has responsibility for the oversight, direction, delivery, and implementation of Neighborhood's Quality Improvement Program. The day-to-day operations of Neighborhood's Quality Improvement Program are overseen by the Medicaid & Commercial Quality Operations Committee and the INTEGRITY Quality and Operations Committee, including the development of Neighborhood's Quality Improvement Program Description, Annual Evaluation and Work Plan.

To assess the effectiveness of the QI Program, Neighborhood produces an annual evaluation which depicts the Plan's measurable performance achievements over the course of the year, with trended data when available. The Quality Improvement Annual Evaluation includes identification of the barriers which made quality improvement difficult to achieve, the interventions recommended to overcome these barriers, and a summary of the overall effectiveness of the program, with consideration given to the adequacy of resources, committee structure, and leadership involvement.

**Table 6** displays key organizational roles of the Neighborhood QI program.

**Table 6: Neighborhood's Organizational Structure for Quality Improvement**

Title	Responsibilities
Board of Directors	The Board of Directors has final authority and responsibility for the care and service delivered to Neighborhood's members
Clinical Affairs Committee (CAC)	Provides direction to the Quality Improvement Program and Neighborhood staff for all activities described in the program, Annual Evaluation and Work Plan, including those quality improvement activities that have been delegated to the health plan's behavioral health vendor and other subcontractors.
Chief Medical Officer (CMO)	Guides the direction, delivery, and implementation of Neighborhood's QI Program, including the Population Health Strategy and oversees the functions, responsibilities, planning, design and implementation of activities undertaken by the QI committees and subcommittees.
Medical Director/Associate Medical Directors	Assists the CMO in providing clinical guidance to the organization by directing the development of new clinical programs, evaluating new medical technologies, developing criteria for standards of performance to evaluate individual provider compliance with clinical practice and preventive health guidelines, and providing oversight to physician reviewer and consultant activities and recruitment.
Medicaid and Commercial Quality and Operations Committee	Provides direction, guidance, and input to the quality improvement activities undertaken and implemented within the organization to monitor and improve the efficiency and operations of Neighborhood's departments and service to members and providers, with primary focus on quality in the Medicaid and Commercial products.
INTEGRITY Quality and Operations Committee	Monitors and reviews the quality improvement and operational activities of the INTEGRITY MMP product.
Clinical Management Committee	Provides direction for clinical services such as new and changing medical and behavioral health technology, clinical medical policies, utilization management procedures, and the assurance of consistent medical review criteria and actions.
Pharmacy and Therapeutics Committee	Acts in an advisory capacity to the Chief Medical Officer on the provision of quality pharmaceutical services.

Title	Responsibilities
Quality Assurance Committee	Responsible for investigating member complaints about their clinical quality of care as well as concerns that are forwarded by Neighborhood staff from their contact with members.
Management Team / Staff	All staff members are given the responsibility and authority to participate in Neighborhood's quality improvement efforts.
Department of Quality Improvement	Oversees the implementation and the effectiveness of the QI Program.

Recommendations on how Neighborhood can better achieve the goals in its quality strategy are presented in **Section VIII** of this report.

## V. EQRO Findings and Conclusions Related to Quality, Timeliness and Access

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In order to assess the impact of Neighborhood's MMC program on **quality** of, **timeliness** of, and **access**, IPRO reviewed pertinent information from a variety of sources, including state managed care standards, health plan contract requirements, performance measures, and state monitoring reports.

This section of the report discusses the results, or findings, from the four required EQR activities (validation of QIPs, validation of performance measures, and review of compliance with Medicaid standards) and one optional EQR activity. For each EQR activity, a summary of the objectives, technical methods of data collection and analysis, description of data obtained, and conclusions and findings are presented.

Neighborhood's strengths and recommendations related to the **quality** of, **timeliness** of, and **access** to care. These three elements are defined as:

- **Quality** is the degree to which an MCP increases the likelihood of desired health outcomes of its enrollees through: (1) its structural and operational characteristics. (2) The provision of health services that are consistent with current professional, evidence-based knowledge. (3) Interventions for performance improvement. (*42 CFR 438.320 Definitions.*)
- **Timeliness** is the MCP's capacity to provide care quickly after a need is recognized. (Office of Disease Prevention and Health Promotion, U.S. Department of Health and Human Services)
- **Access** is the timely use of services to achieve health optimal outcomes, as evidenced by MCPs successfully demonstrating and reporting on outcome information for the availability and timeliness elements. (*42 CFR 438.320 Definitions.*)

Additionally, **Section VII** of this report includes IPRO's assessment of Neighborhood's response to the EQR 2019 recommendations per *42 CFR § 438.364 External quality review results (a)(6)*.

### Validation of Performance Improvement Projects

#### Objectives

*Title 42 CFR § 438.358 Activities related to external quality review (b)(1)(i)* mandates that the state or an EQRO must validate the PIPs that were underway during the preceding 12 months. IPRO performed this activity on behalf of EOHHS for the 2020 QIPs. The QIP validation was conducted using an evaluation approach developed by IPRO and consistent with the CMS EQR *Protocol 1-Validation of Performance Improvement Projects*.

MCPs were required to conduct at least four QIPs directed at the needs of the Medicaid-enrolled population, as well as the MCP-established Communities of Care programs<sup>11</sup>. Neighborhood conducted six QIPs in 2020. QIP 1 aimed to improve Children and Adolescents' Access to PCPs; QIP 2 aimed to increase the number of children who received a developmental screening in the first 3 years of life; QIP 3 aimed to increase follow-up care for children prescribed ADHD medication; QIP 4 aimed at increasing lead screening in children; QIP 5 aimed at improving

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<sup>11</sup> The State's *Medicaid Managed Care Services Contract* (July 2018) requires that all Health Plans establish and maintain a Communities of Care program designed to decrease non-emergent and avoidable emergency department (ED) utilization through service coordination, defined member responsibilities, and associated incentives and rewards.

performance for care of older adults, and QIP 6 aimed at increasing the percentage of transitions from the nursing home into the community.

## Technical Methods of Data Collection and Analysis

All QIPs were documented using NCQA's *Quality Improvement Activity (QIA) Form*. A copy of the *QIA Form* is in **Appendix A** of this report.

The QIP assessments were conducted using an evaluation approach developed by IPRO and consistent with CMS *EQR Protocol 1-Validation of Performance Improvement Projects*. IPRO's assessment includes the following 10 elements:

1. Review of the selected study topic(s) for relevance of focus and for relevance to the MCP's enrollment.
2. Review of the study question(s) for clarity of statement.
3. Review of the identified study population to ensure it is representative of the MCP's enrollment and generalizable to the MCP's total population.
4. Review of selected study indicator(s), which should be objective, clear, unambiguous, and meaningful to the focus of the QIP.
5. Review of sampling methods (if sampling used) for validity and proper technique.
6. Review of the data collection procedures to ensure complete and accurate data were collected.
7. Review of the data analysis and interpretation of study results.
8. Assessment of the improvement strategies for appropriateness.
9. Assessment of the likelihood that reported improvement is "real" improvement.
10. Assessment of whether the MCP achieved sustained improvement.

Upon IPRO's review of the 2020 QIP QIA Forms completed by the MCPs and provided to IPRO by EOHHS, a determination was made as to the overall credibility of the results of each QIP, with assignment of one of three categories:

- There are no validation findings that indicate that the credibility is at risk for the QIP results.
- The validation findings generally indicate that the credibility for the QIP results is not at risk; however, results should be interpreted with some caution. Processes that put the findings at-risk are enumerated.
- There were one or more validation findings that indicate a bias in the QIP results. The concerns that put the conclusion at-risk are enumerated.

## Description of Data Obtained

Information obtained throughout the reporting period included project rationale, aims and goals, target population, performance indicator descriptions, performance indicator rates (baseline, interim, and final), methods for performance measure calculations, targets, benchmarks, interventions (planned and executed), tracking measures and rates, barriers, limitations, and next steps for continuous quality improvement.

## Conclusions and Findings

Neighborhood conducted the following QIPs in 2020:

- QIP 1 – Children's and Adolescents' Access to Primary Care Practitioners
- QIP 2 – Developmental Screening in the 1<sup>st</sup>, 2<sup>nd</sup>, 3<sup>rd</sup> Years of Life
- QIP 3 – Follow-up Care for Children Prescribed Attention Deficit/Hyperactivity Disorder Medication
- QIP 4 – Lead Screening in Children
- QIP 5 – Improve Performance for Care for Older Adults

- QIP 6 – Increase the Percentage of Transitions from the Nursing Home to the Community

IPRO's assessment of Neighborhood methodology found that there were no validation findings that indicated that IPRO's assessment of Neighborhood 's methodology found that there were no validation findings that indicated that the credibility of six QIPS was at risk.

**Table 7** displays a summary of the Neighborhood QIP assessments. Summaries of each QIP immediately follow.

**Table 7: QIP Validation Findings, MY 2020**

Validation Element	QIP 1	QIP 2	QIP 3	QIP 4	QIP 5	QIP 6
Selected Topic	Met	Met	Met	Met	Met	Met
Study Question	Met	Met	Met	Met	Met	Met
Indicators	Met	Met	Met	Met	Met	Met
Population	Met	Met	Met	Met	Met	Met
Sampling Methods	Met	Met	Met	Met	Met	Met
Data collection Procedures	Met	Met	Met	Met	Met	Met
Interpretation of Study Results	Met	Met	Met	Met	Met	Met
Improvement Strategies	Met	Met	Met	Met	Met	Met

### QIP 1: Children and Adolescents' Access to Primary Care Practitioners (CAP), Ages 12-24 Months and 25 Months-6 Years

Aim: Neighborhood aimed to improve access to primary care practitioners for child and adolescent members aged 12 months-6 years.

Indicators/Goals: HEDIS *Children and Adolescents' Access to Primary Care Practitioners*

1. The percentage of children aged 12–24 months who had one or more ambulatory or preventive care visits with a PCP during the measurement year.
2. The percentage of children aged 25 months-6 years who had one or more ambulatory or preventive care visits with a PCP during the measurement year.

The goal for the 12-24 months age cohort was to meet or exceed the *2017 Quality Compass* national Medicaid 90th percentile. The goal for the 25 months-6 years age cohort was to meet or exceed the *2018 Quality Compass* national Medicaid 90th percentile.

#### Member-Focused Interventions:

- Neighborhood posted to Facebook and Twitter regarding the importance of well visits targeting providers and members.
- Members were eligible to receive a \$25 incentive gift card for completing an annual well visit at 18 months and between the ages of three and twelve years.
- Live outreach calls were conducted to non-compliant members regarding the importance of immunizations and well visits.
- Automated calls were conducted to promote the importance of well visits, immunizations, and lead screening to all families with Medicaid members two years old and under.
- Published an article on the importance of well visits and immunizations.

#### Provider-Focused Interventions:

- Neighborhood posted to Facebook and Twitter regarding the importance of Well visits targeting providers and members.
- Provider articles were published on the importance of well visits during COVID-19/telehealth options and the COVID-19 impact on childhood immunizations and well visits.
- Shared best practices and HEDIS measure requirements with low performing providers.

#### MCP-Focused Intervention:

- Conducted monthly quality improvement meetings to discuss barriers to performance and brainstorm interventions for prioritization and implementation.

Results: Neighborhood's MY 2020 rates for the 12-24 months age cohort and the 25 months-6 years age cohort did not meet the goal rate. There are no validation findings that indicate that the credibility is at risk for the QIP results.

**Table 8** displays the results of QIP 1 including measurement periods and project goal rates.

**Table 8: QIP 1 – HEDIS Children's and Adolescents' Access to Primary Care Practitioners, MY 2017-MY 2020**

Measurement Period	Measurement Type	Numerator	Denominator	Results	Goal
<b>Ages 12-24 Months</b>					
MY 2017	Baseline	3,576	3,776	94.78%	97.91%
MY 2018	Re-measurement 1	3,452	3,580	96.42%	97.82%
MY 2019	Re-measurement 2	3,162	3,231	97.86%	97.99%
MY 2020	Re-measurement 3	3,476	3,654	95.13%	97.99%
<b>Ages 25 Months-6 Years</b>					
MY 2017	Baseline	15,645	17,516	89.32%	92.88%
MY 2018	Re-measurement 1	15,566	17,553	88.68%	92.59%
MY 2019	Re-measurement 2	14,975	16,299	91.88%	93.30%
MY 2020	Re-measurement 3	14,041	17,023	82.48%	93.30%

#### **QIP 2: Developmental Screening in the 1st, 2nd, 3rd Years of Life**

Aim: Neighborhood aimed to increase the percentage of children who were screened for risks of developmental, behavioral, and social delays using standardized screening tools in the 12 months preceding their first, second and third birthdays.

Indicators/Goals: National Quality Forum (NQF) *Developmental Screening in the First Three Years of Life*

1. The percentage of children who were screened for risks of developmental, behavioral, and social delays using standardized screening tools in the 12 months preceding their first birthday.
2. The percentage of children who were screened for risks of developmental, behavioral, and social delays using standardized screening tools in the 12 months preceding their second birthday; and
3. The percentage of children who were screened for risks of developmental, behavioral, and social delays using standardized screening tools in the 12 months preceding their third birthday.

The goal for this QIP is to achieve the 90th percentile of the RI EOHHS State-specified performance goal, i.e., 65%.

#### Member-Focused Interventions:

- Automated voice calls to promote the importance of well visits, immunizations, and lead screening to all families with Medicaid member's two years old and under.
- A \$25 incentive gift cards were offered to members who received an annual well visit at 18 months and between the ages of three and twelve.

#### Provider-Focused Interventions:

- Shared best practices with four community health centers, including suggestions on scheduling visits to ensure that the visits occur within specified timeframe in order to be compliant with the measure.
- Published two provider articles on the importance of well visits during COVID-19/telehealth options and the COVID-19 impact on childhood immunizations and well visits.

#### MCP-Focused Interventions:

- Emailed a letter to select low-performing accountable entities providing best practices for capturing and billing developmental screenings.
- Conducting monthly quality improvement meetings to discuss barriers to performance and brainstorm interventions for prioritization and implementation.

Results: Neighborhood reported higher rates of developmental screenings for all indicators. MY 2020 rates for these indicators exceeded goal rates. There are no validation findings that indicate that the credibility is at risk for the QIP results.

**Table 9** displays the results of QIP 2 including measurement periods and project goal rates.

**Table 9: QIP 2 – NQF Developmental Screening in the First Three Years of Life, MY 2014-MY 2020**

Measure/ Measurement Period	Measurement Type	Numerator	Denominator	Results	Goal
<b>Preceding 1st Birthday</b>					
MY 2014 <sup>1</sup>	Baseline	68	137	49.64%	60%
MY 2015 <sup>2</sup>	Re-measurement 1	54	137	39.42%	60%
MY 2016 <sup>1</sup>	Re-measurement 2	76	137	55.47%	60%
MY 2017 <sup>1</sup>	Re-measurement 3	86	137	62.77%	65%
MY 2018 <sup>1</sup>	Re-measurement 4	90	137	65.69%	65%
MY 2019	Re-measurement 5	2,267	3,264	69.45%	65%
MY 2020	Re-measurement 6	2,287	3,251	70.35%	65%
<b>Preceding 2nd Birthday</b>					
MY 2014 <sup>1</sup>	Baseline	79	137	57.66%	60%
MY 2015 <sup>2</sup>	Re-measurement 1	87	137	63.50%	60%
MY 2016 <sup>1</sup>	Re-measurement 2	99	137	72.26%	60%
MY 2017 <sup>1</sup>	Re-measurement 3	95	137	69.34%	65%
MY 2018 <sup>1</sup>	Re-measurement 4	103	137	74.45%	65%
MY 2019	Re-measurement 5	2,141	3,119	68.64%	65%
MY 2020	Re-measurement 6	2,208	2,958	74.65%	65%
<b>Preceding 3rd Birthday</b>					
MY 2014 <sup>1</sup>	Baseline	85	137	62.04%	60%
MY 2015 <sup>2</sup>	Re-measurement 1	84	137	61.31%	60%
MY 2016 <sup>1</sup>	Re-measurement 2	88	137	64.23%	60%



Measure/ Measurement Period	Measurement Type	Numerator	Denominator	Results	Goal
MY 2017 <sup>1</sup>	Re-measurement 3	88	137	64.23%	65%
MY 2018 <sup>1</sup>	Re-measurement 4	89	137	64.96%	65%
MY 2019	Re-measurement 5	2,160	3,472	62.21%	65%
MY 2020	Re-measurement 6	2,117	3,143	67.36%	65%

<sup>1</sup> Rate calculated using the hybrid methodology.

<sup>2</sup> Rate calculated using the administrative methodology.

### QIP 3: Follow-Up Care for Children Prescribed Attention Deficit/Hyperactivity Disorder Medication

Aim: Neighborhood aimed to improve the follow-up care for children prescribed ADHD medication.

Indicators/Goals: HEDIS *Follow-up Care for Children Prescribed ADHD Medication*

1. *Initiation Phase* – The percentage of members 6-12 years of age as of the earliest prescription dispensing date (index prescription start date) with an ambulatory prescription dispensed for ADHD medication who had one follow-up visit with practitioner with prescribing authority during the 30 days following the index prescription start date.
2. *Continuation and Maintenance Phase* – The percentage of members 6-12 years of age as of the earliest prescription dispensing date (index prescription start date) with an ambulatory prescription dispensed for ADHD medication, who remained on the medication for at least seven months (210 days), in addition to the visit in the initiation phase, had at least two follow-up visits with a practitioner within nine months (270 days) after the initiation phase has ended.

The goals of this QIP for the initiation phase was to increase the rate to meet the *Quality Compass* national Medicaid 90th percentile (55.91%). For the continuation and maintenance phase, the goal was to increase the rate to meet the *Quality Compass* national Medicaid 90th percentile (69.14%).

#### Member-Focused Intervention:

- Neighborhood conducted telephone calls to prescribers of members newly prescribed ADHD medication to ensure that members have a follow-up appointment scheduled.

#### Provider-Focused Interventions:

- Neighborhood sent a fax form to practitioners of members with newly prescribed ADHD medication to confirm that each member had a follow-up appointment scheduled and if not, encourage them to schedule a follow-up appointment.
- Published provider newsletter article about ADHD in the Neighborhood provider newsletter.

#### MCP-Focused Intervention:

- Published social media posts informing members about ADHD, as well as how to deal with social isolation.

Results: Neighborhood's MY 2020 rates for the initiation phase and the continuation and maintenance phase did not achieve their QIP goals. There are no validation findings that indicate that the credibility is at risk for the QIP results.

**Table 10** displays the results of QIP 3 including measurement periods and project goal rates.

Table 10: QIP 3 – HEDIS Follow-Up Care for Children Prescribed ADHD Medication, MY 2017-MY 2020

Measurement Period	Measurement Type	Numerator	Denominator	Results	Goal
<b>Initiation Phase</b>					
MY 2017	Baseline	418	885	47.23%	55.91%
MY 2018	Re-measurement 1	423	889	47.58%	55.91%
MY 2019	Re-measurement 2	418	891	46.91%	55.91%
MY 2020	Re-measurement 3	434	851	51.00%	55.91%
<b>Continuation and Maintenance Phase</b>					
MY 2017	Baseline	130	223	58.30%	69.14%
MY 2018	Re-measurement 1	134	219	61.19%	69.14%
MY 2019	Re-measurement 2	127	226	56.19%	69.14%
MY 2020	Re-measurement 3	134	221	60.63%	69.14%

#### QIP 4: Lead Screening in Children

Aim: Neighborhood aimed to increase the percentage of children screened for lead by their second birthday.

Indicator/Goal: HEDIS *Lead Screening in Children*

1. The percentage of Neighborhood members screened for lead by their second birthday.

The goal of this QIP is to meet or exceed the national Medicaid 90th percentile for the HEDIS *Lead Screening in Children* measure.

##### Member-Focused Interventions:

- Automated voice calls to promote the importance of well visits, immunizations, and lead screening to all families with Medicaid member's two years old and under.
- Live Outreach calls conducted to non-compliant members to encourage immunizations and well visits.
- Member Newsletter: Article published in the summer iteration of the member newsletter on the importance of well visits and immunizations.
- Member Rewards: Neighborhood provided an incentive of \$25 to parents of children for completing lead screening by the age of two years.
- Member Post Cards: Neighborhood sends lead test reminder postcards monthly to children turning one year old.

##### Provider-Focused Interventions:

- Distribution of Provider Gap in Care Reports reminding providers of the importance of lead screening, how they can help and what Neighborhood is doing to help.
- Neighborhood shared best practices with low performing providers as well as the HEDIS CAP requirement.

##### MCP-Focused Interventions:

- Collaboration with the Rhode Island Department of Health (RIDOH) regarding prevention of lead poisoning, promoting screening and rescreening for high blood lead levels including discussions about lead screening guidelines and laws, exchange of data, sharing of best practices and collaborative efforts around member and provider education.

Results: Neighborhood's MY 2020 *Lead Screening* rate did not achieve the QIP's goal rate. The MY 2020 rate was lower than the MY 2015 baseline rate. There are no validation findings that indicate that the credibility is at risk for the QIP results.

Table 11 displays the results of QIP 4 including measurement periods and project goal rates.

**Table 11: QIP 4 – HEDIS Lead Screening in Children, MY 2015-MY 2020**

Measurement Period	Measurement Type	Numerator	Denominator	Results	Goal
MY 2015	Baseline	2,502	3,018	82.90%	84.77%
MY 2016	Re-measurement 1	2,884	3,688	78.20%	86.37%
MY 2017	Re-measurement 2	2,699	3,416	79.01%	85.64%
MY 2018	Re-measurement 3	2,786	3,536	78.79%	85.90%
MY 2019	Re-measurement 4	2,475	3,119	79.35%	86.62%
MY 2020	Re-measurement 5	2,282	2,958	77.15%	86.62%

### QIP 5: Improve Performance for Care for Older Adults

Aim: Neighborhood aimed to improve performance for care of older adults.

Indicators/Goals: HEDIS *Care for Older Adults*

1. *Advanced Care Planning* – The percentage of members 66 years and older who had an advanced care plan in place during the measurement year
2. *Medication Review* – The percentage of members 66 years and older who had a medication review during the measurement year
3. *Functional Status Assessment* – The percentage of members 66 years and older who had a functional status assessment during the measurement year
4. *Pain Assessment* – The percentage of members 66 years and older who had a pain assessment during the measurement year

The goals of this PIP were to increase the percentage of members 66 years and older who had:

- an advanced care plan to 50%,
- a medication review to 81%,
- a functional status assessment to 69%, and
- a pain assessment to 64%.

#### Member-Focused Intervention:

- Generated gaps in care lists of members without advanced care plans and the MCP's Care Management Team worked with the nursing homes to gather this information to be added to the HEDIS supplemental database.

#### Provider-Focused Intervention:

- Educated providers on the Care for Older Adults requirements and assistance in improving COA documentation in the provider electronic medical records to facilitate data collection for COA.

#### MCP-Focused Interventions:

- Neighborhood's pharmacy team identified an existing pharmacist "license number" reporting field to use for capturing and transferring accurate medication review data.

- The MCP's care management team outreached to high-risk members to obtain health risk assessment information.
- Neighborhood began utilizing the care management software, Acuity, as a supplemental database for the advanced care plan, functional status assessment, and pain assessment measures.
- Implementation of modifications to the health risk assessment well as structural and systematic modifications to the care management software, Acuity, to include the COA measures.

Results: Neighborhood's MY rates for *Advanced Care Plan* and *Pain Assessment* exceeded goal rates, while MY 2020 rates for *Medication Review* and *Functional Status Assessment* did not meet goal rates. There are no validation findings that indicate that the credibility is at risk for the QIP results.

**Table 12** displays the results of QIP 5 including measurement periods and project goal rates.

**Table 12: QIP 5 – HEDIS Care for Older Adults, MY 2017-MY 2020**

Measurement Period/Measure	Measurement Type	Numerator	Denominator	Results	Goal
<b>Care for Older Adults: Advanced Care Plan</b>					
MY 2017	Baseline	163	411	39.66%	40%
MY 2018	Re-measurement 1	257	411	62.53%	40%
MY 2019	Re-measurement 2	255	411	62.04%	45%
MY 2020	Re-measurement 3	3,773	5,457	69.14%	50%
<b>Care for Older Adults: Medication Review</b>					
MY 2017	Baseline	281	411	68.37%	79%
MY 2018	Re-measurement 1	352	411	85.64%	79%
MY 2019	Re-measurement 2	366	411	89.05%	80%
MY 2020	Re-measurement 3	3,980	5,457	72.93%	81%
<b>Care for Older Adults: Functional Status Assessment</b>					
MY 2017	Baseline	207	411	50.36%	67%
MY 2018	Re-measurement 1	295	411	71.78%	67%
MY 2019	Re-measurement 2	302	411	73.48%	68%
MY 2020	Re-measurement 3	3,208	5,457	58.79%	69%
<b>Care for Older Adults: Pain Assessment</b>					
MY 2017	Baseline	268	411	65.21%	62%
MY 2018	Re-measurement 1	366	411	89.05%	62%
MY 2019	Re-measurement 2	378	411	91.97%	63%
MY 2020	Re-measurement 3	4,209	5,457	77.13%	64%

## QIP 6: Transitions from the Nursing Home Facility to the Community

Aim: Neighborhood aimed increase the percentage of transitions from the nursing home to the community.

### Indicators/Goals:

1. The percentage of INTEGRITY MMP members who have transitioned out of a nursing facility to the community under the RTHP.
2. The number of INTEGRITY MMP members who have transitioned out of a nursing facility to the community.

The goals are to transition 20 INTEGRITY MMP enrollees eligible for the RTHP from the nursing facility to the community in 2020 and to transition 35% of INTEGRITY MMP members to the community.

#### Member-Focused Interventions:

- Provided telephonic education to member and/or members' representative about the services available to them once transitioned. Due to COVID-19, the education was transitioned to telephonic only.
- Neighborhood's pharmacy team performed outreach to members listed on a "gap in care" report to ensure safe, quality care was facilitated for nursing facility members who were prescribed antipsychotic medication.

#### Provider-Focused Intervention:

- Neighborhood's manager of care management implemented a process whereby nursing staff conducted reassessments every six months as opposed to annually.

#### MCP-Focused Interventions:

- Neighborhood obtained access to approximately 55 nursing homes' electronic medical records systems to assist in identifying opportunities for transition through reassessment.
- Neighborhood's Nursing Home Measures Quality Withhold Work Group implemented the Nursing Home Incentive Pilot Program, wherein participating nursing facilities submit their staffing metrics to Neighborhood for the calendar year and receive a calculated payment upon passing specific nursing home quality withhold measures.

Results: For the *Nursing Home transition to the Community for RTHP eligibles* indicator, Neighborhood reported 19 transitioned members in MY 2020 and did not meet the goal of transitioning 20 members. However, the MY 2020 rate for the *All Transitions from the Nursing Home to the Community* indicator exceeded the goal rate. There are no validation findings that indicate that the credibility is at risk for the QIP results.

**Table 13** displays the results of QIP 6 including measurement periods and project goal rates.

**Table 13: QIP 6 – Transitions from the Nursing Home to the Community, MY 2017-MY 2020**

Measurement Period/Measure	Measurement Type	Numerator	Denominator	Results	Goal
<b>Nursing Home Transitions to the Community for Rhode To Home Program (RTHP) Eligibles</b>					
MY 2017	Baseline	14	55	14 (25.5%) RTHP members transitioned	20 RTHP members transitioned
MY 2018	Re-measurement 1	20	58	20 (34.5%) RTHP members transitioned	20 RTHP members transitioned
MY 2019	Re-measurement 2	17	31	17 (54.8%) RTHP members transitioned	20 RTHP members transitioned
MY 2020	Re-measurement 3	19	30	19 (63.3%) RTHP members transitioned	20 RTHP members transitioned
<b>All Transitions from the Nursing Home to the Community</b>					
MY 2017	Baseline	391	982	39.8%	35%
MY 2018	Re-measurement 1	647	862	75.1%	35%
MY 2019	Re-measurement 2	390	636	61.3%	35%

IPRO's assessment of Neighborhood's strengths and opportunities for improvement related to QIPs, as well as recommendations to improve **quality**, **timeliness** and **access** are presented in **Section VIII** of this report.

## Validation of Performance Measures

### Information Systems Capabilities Assessment

The ISCA data collection tool allows the state or EQRO to evaluate the strength of each MCP's information system (IS) capabilities to meet the regulatory requirements for quality assessment and reporting. *Title 42 CFR § 438.242 Health information systems* and *42 CFR § 457.1233 Structure and operation standards (d) Health information systems* also require the state to ensure that each MCP maintains a health information system that collects, analyzes, integrates, and reports data for purposes including utilization, claims, grievances and appeals, disenrollment for reasons other than loss of Medicaid or CHIP eligibility, rate setting, risk adjustment, quality measurement, value-based purchasing, program integrity, and policy development. While some portions of the ISCA are voluntary, there are some components that are required to support the execution of the mandatory EQR-related activities protocols.

While the *CMS External Quality Review (EQR) Protocols* published in October 2019 stated that an ISCA is a required component of the mandatory EQR activities, CMS later clarified that the systems reviews that are conducted as part of the HEDIS audit may be substituted for an ISCA.

Neighborhood contracted with a NCQA-certified HEDIS compliance auditor for HEDIS MY 2020. Auditors assessed the MCP's compliance with NCQA standards in the following designated IS categories as part of the NCQA HEDIS MY 2020 Compliance Audit:

- **IS 1.0 Medicaid Services Data**: Sound Coding Methods and Data Capture, Transfer and Entry
- **IS 2.0 Enrollment Data**: Data Capture, Transfer and Entry
- **IS 3.0 Practitioner Data**: Data Capture, Transfer and Entry
- **IS 4.0 Medical Record Review Processes**: Training, Sampling, Abstraction and Oversight
- **IS 5.0 Supplemental Data**: Capture, Transfer and Entry
- **IS 6.0 Data Production Processing**: Transfer, Consolidation, Control Procedures that Support Measure Reporting Integrity
- **IS 7.0 Data Integration and Reporting**: Accurate Reporting, Control Procedures that Support Measure Reporting Integrity

The term "IS" – Information Systems – included the computer and software environment, data collection procedures, and abstraction of medical records for hybrid measures. The IS evaluation included a review of any manual processes used for HEDIS reporting. The compliance auditor determined the extent to which the MCPs had the automated systems, information management practices, processing environment, and control procedures to capture, access, translate, analyze, and report each HEDIS measure.

An MCP meeting all IS standards required for successful HEDIS reporting and submitting HEDIS data to EOHHS according to the requirements in Medicaid model contract were considered strengths during this evaluation. An MCP not meeting an IS standard was considered an opportunity for improvement during this evaluation.

## HEDIS Performance Measures

### Objectives

EOHHS utilizes performance measures to evaluate the quality and accessibility of services furnished to Medicaid beneficiaries and to promote positive health outcomes. Section 2.12.03.03 of the Contractor requires each MCP to provide performance measure data, specifically HEDIS, to EOHHS within 30 days following the presentation of these results to the MCPs quality improvement committee.

Further, Rhode Island Medicaid MCPs are required to seek and maintain NCQA Accreditation and to provide evidence of the accreditation to EOHHS. As part its accreditation process, HEDIS data reported by the applying MCP to NCQA is used to effectively measure care and service performance.

*Title 42 CFR § 438.358 Activities related to external quality review (2)(b)(1)(ii)* mandates that the state or an EQRO must validate the performance measures that were calculated during the preceding 12 months. EOHHS contracted with IPRO to perform this activity for MY 2020.

### Technical Methods of Data Collection and Analysis

All MCP submitting HEDIS data to NCQA must undergo a HEDIS Compliance Audit, which may only be performed by licensed organizations and certified auditors. Neighborhood contracted with Attest Health Care Advisors as its HEDIS Compliance Auditor for HEDIS MY 2020.

In accordance with the 2020 NCQA *HEDIS Compliance Audit: Standards, Policies, and Procedures*, Volume 5, the compliance auditor evaluated compliance with NCQA's IS standards. NCQA's IS standards detail the minimum requirements of an MCP's IS, as well as criteria that must be met for any manual processes used to report HEDIS information.

The NCQA-certified HEDIS compliance auditor validated the MCP's reported HEDIS rate and produce formal documents detailing the results of the validation. For each MCP, IPRO obtained a copy of the HEDIS MY 2020 FAR and a locked copy of the HEDIS MY 2020) Audit Review Table (ART). The MCP's NCQA-certified HEDIS compliance auditor produced both information sources. IPRO used these audit reports as the foundation for its evaluation.

IPRO's validation of Neighborhood's performance measures was conducted in alignment with the CMS EQR *Protocol 2-Validation of Performance Measures*. IPRO evaluated the Neighborhood's methodology for rate calculation to determine the accuracy of the reported rates using the following approach:

- Review of the HEDIS MY 2020 FAR which includes a summary of findings of the compliance auditor's IS reviews, medical record validation, and rate-level reporting designations.
- Assessment of the accuracy of reported HEDIS MY 2020 rates through appropriate benchmarking, review of trended data, and evaluation of the impact the MCP's QI activities have on health outcomes.

IPRO reviewed the HEDIS MY 2020 FAR and ART produced by Attest Health Care Advisors to ensure that that Neighborhood calculated its rates based on complete and accurate data using NCQA's established standards and that calculation of these rates also aligned with EOHHS requirements. Specifically, IPRO evaluated Neighborhood's IS capabilities that could affect the HEDIS Medicaid reporting set and verified that all performance measures were reportable.



Once the Neighborhood's compliance with NCQA's established standards was examined, IPRO objectively analyzed the MCP's HEDIS MY 2020 results and evaluated Neighborhood's current performance levels relative to the 2021 *Quality Compass* (MY 2020) national Medicaid percentiles.

Unless otherwise noted, benchmarks referenced in this report derive from NCQA's *Quality Compass 2021* for Medicaid (*National – All Lines of Business [excluding PPOs and EPOs]*) and represent the performance of all health plans that reported Medicaid HEDIS data to NCQA for HEDIS MY 2020.

## Description of Data Obtained

The FAR included key audit dates, product lines audited, audit procedures, vendors, data sources including supplemental, descriptions of system queries used by the auditor to validate the accuracy of the data, results of the medical record reviews, results of the information systems capabilities assessment, and rate status. Rates were determined to be reportable, or not reportable (small denominator, benefit not offered, not reported, not required, biased, or unaudited).

The ART produced by the HEDIS Compliance Auditor displayed performance measure-level detail including data collection methodology (administrative or hybrid), eligible population count, exclusion count, numerator event count by data source (administrative, medical record, supplemental), and reported rate. When applicable, the following information was also displayed in the ART: administrative rate before exclusions; minimum required sample size (MRSS), and MRSS numerator events and rate; oversample rate and oversample record count; exclusions by data source; count of oversample records added; denominator; numerator events by data source (administrative, medical records, supplemental); and reported rate.

## Conclusions and Findings

### Validation of Performance Measures

Neighborhood's HEDIS MY 2020 FAR produced by Attest Health Care Advisors indicated that Neighborhood met all the requirements to successfully report HEDIS data to EOHHS and to NCQA. **Table 14** displays the results of the IS audit.

**Table 14: Neighborhood's Compliance with Information System Standards**

Information System Standard	Review Result
1.0 Medical Services Data	Met
2.0 Enrollment Data	Met
3.0 Practitioner Data	Met
4.0 Medical Record Review Processes	Met
5.0 Supplemental Data	Met
6.0 Data Preproduction Processing	Met
7.0 Data Integration and Reporting	Met

### Performance Measure Results

This section of the report explores the utilization of Neighborhood's services by examining select measures under the following domains:

- Use of Services – Two measures (three rates) examine the percentage of Medicaid child and adolescent access routine care



- Effectiveness of Care – Five measures (seven rates) examine how well an MCP provides preventive screenings and care for members with acute and chronic illness
- Access and Availability – Three measures (five rates) examine the percentage of Medicaid children, adolescents, child-bearing women, and adults who received PCP or preventive care services, ambulatory care (adults only), or timely prenatal and postpartum care

Concerning the Use of Services measures, the three rates reported by Neighborhood exceeded the national Medicaid MY 2020 mean. The *Well-Child Visits in the First 30 Months of Life – First 15 Months* rate performed at the national Medicaid 95th percentile while the rate for *Well-Child Visits in the First 30 Months of Life – First 15-30 Months* performed at the 90th percentile. The *Child and Adolescent Well-Care Visits* rate performed at the 66.67th percentile.

Concerning the Effectiveness of Care measures, six of seven rates reported by Neighborhood exceeded the national Medicaid MY 2020 mean. Neighborhood's reported rates for *Cervical Cancer Screening*, *Childhood Immunization – Combination 10*, and *Follow-Up After Hospitalization for Mental Illness – 30 Days* performed at the 95th percentile. The rate for *Childhood Immunization – Combination 3* performed at the 90th percentile. Neighborhood's reported rates for *Chlamydia Screening in Women* and *Follow-Up After Hospitalization for Mental Illness – 7 Days* performed at the 75th percentile. The *Comprehensive Diabetes Care – HbA1c Testing* rate performed at the 25th percentile.

Concerning Access and Availability, the five rates reported by Neighborhood exceeded the national Medicaid MY 2020 mean. Neighborhood's reported rate for *Timeliness of Prenatal Care* rate performed at the 95th percentile. Neighborhood's reported rate for *Adults' Access to Preventive/Ambulatory Health Services 65+ years* age cohort performed at the 90th percentile, while the 45-64 years age cohort performed at the 75th percentile and 20-44 years age cohort performed at the 66.67th percentile. The *Postpartum Care* rate performed at the 50th percentile.

**Table 15** displays Neighborhood's MY 2020 HEDIS rates, as well as the national Medicaid benchmarks achieved by the MCP, and the national Medicaid means.

Table 15: Neighborhood's HEDIS Rates, MY 2018-MY 2020

Domain/Measures	Neighborhood HEDIS MY 2018	Neighborhood HEDIS MY 2019	Neighborhood HEDIS MY 2020	Quality Compass MY 2020 National Medicaid Benchmark (Met/Exceeded)	Quality Compass MY 2020 National Medicaid Mean
<b>Use of Services</b>					
Well-Child Visits in the First 30 Months of Life – First 15 Months			76.45%	95th	52.93%
Well-Child Visits in the First 30 Months of Life – First 15 to 30 Months			85.63%	90th	71.02%
Child and Adolescent Well-Care Visits			53.46%	66.67th	46.12%
<b>Effectiveness of Care</b>					
Cervical Cancer Screening for Women	71.04%	74.21%	73.83%	95th	56.84%
Chlamydia Screening for Women	68.58%	68.85%	63.19%	75th	54.49%
Childhood Immunization Status – Combination 3	78.83%	78.66%	80.15%	90th	67.60%
Childhood Immunization Status – Combination 10	57.65%	59.95%	62.31%	95th	38.88%
Comprehensive Diabetes Care – HbA1c Testing	90.82%	90.38%	81.05%	25th	82.82%
Follow-Up After Hospitalization for Mental Illness – 7 Days	57.14%	54.33%	55.92%	75th	39.36%
Follow-Up After Hospitalization for Mental Illness – 30 Days	76.54%	72.77%	73.82%	95th	58.92%
<b>Access and Availability</b>					
Adults' Access to Preventive/Ambulatory Health Services – 20-44 Years	77.35%	81.43%	78.96%	66.67th	74.05%
Adults' Access to Preventive/Ambulatory Health Services – 45-64 Years	87.59%	89.97%	87.92%	75th	82.08%
Adults' Access to Preventive/Ambulatory Health Services – 65+ Years	94.43%	95.77%	93.47%	90th	82.43%
Prenatal and Postpartum Care – Timeliness of Prenatal Care	93.24%	96.11%	95.86%	95th	83.82%
Prenatal and Postpartum Care – Postpartum Care	71.96%	87.59%	88.08%	50th	75.07%

IPRO's assessment of Neighborhood's strengths and opportunities for improvement related to the performance measures, as well as recommendations to improve **quality**, **timeliness** and **access** are presented in **Section VIII** of this report.

## Rhode Island Performance Goal Program

### Objectives

In 1998, the State initiated the Rhode Island Performance Goal Program, an incentive program that established benchmark standards for quality and access performance measures. Rhode Island was the second state in the nation to implement a value-based purchasing incentive for its Medicaid program. In 2020, the Performance Goal Program entered its twentieth year.

The 2005 reporting year marked a particularly important transition for the PGP, wherein the program was redesigned to be more fully aligned with nationally recognized performance benchmarks through the use of new performance categories and standardized HEDIS and CAHPS measures. In addition, superior performance levels were clearly established as the basis for incentive awards. For reporting year 2020, the performance categories were redefined into six categories. For Reporting Year 2020, the following performance categories were used to evaluate MCP performance:

1. Utilization
2. Access to Care
3. Prevention and Screening
4. Women's Health
5. Chronic Care
6. Behavioral Health

### Technical Methods of Data Collection and Analysis

Within each of the performance categories is a series of measures, including a variety of standard HEDIS and CAHPS measures, as well as State-specific measures for areas of particular importance to the State that do not have national metrics for comparison. Many of the measures are calculated through the MCP's HEDIS and CAHPS data submissions.

Benchmarks referenced in the evaluation of PGP results derive from NCQA's *2020 Quality Compass* MY 2019 for Medicaid (National – All Lines of Business [excluding PPOs and EPOs]) and represent the performance of all health plans that reported Medicaid HEDIS data to NCQA for HEDIS MY 2019.

### Description of Data Obtained

IPRO received a copy of the evaluation reports produced by EOHHS for each MCP included in the PGP for reporting year (RY) 2020. The evaluation reports include measure descriptive information such as name and corresponding performance category, rates, and numerators and denominators for each measure by Rhode Island Medicaid managed care program.

### Conclusions and Findings

This section of the report evaluates Neighborhood's performance on the PGP measures for RY 2019 (MY 2018) and RY 2020 (MY 2019) for all Medicaid populations. The HEDIS percentiles displayed were derived from the 2020 Performance Goal Program results, in which rates were benchmarked against the NCQA's *2020 Quality Compass* MY 2019 for Medicaid.

The Utilization domain included two HEDIS measures for RY 2020, *Well-Child visits in the First 15 Months of Life (6 or More Visits)* and *Well-Child Visits in the 3<sup>rd</sup>, 4<sup>th</sup>, 5<sup>th</sup> and 6<sup>th</sup> Years of Life*. Neighborhood's rates for both measures increased compared to RY 2019 and exceeded the national Medicaid 90th and 66.67th percentiles, respectively.

The Access to Care domain included *Children and Adolescents' Access to Primary Care Practitioners – 7-11 years* and *– 12-18 years* measures, and the *Prenatal and Postpartum Care – Timeliness of Prenatal Care* measure. Neighborhood's RY 2020 rates for these measures increased from RY 2019. Rates for the 7-11 years and 12-19 years age cohorts of the *Children and Adolescents' Access to Primary Care Practitioners* measure performed at national Medicaid 75th percentile and the *Timeliness of Prenatal Care* measure performed at the national Medicaid 90th percentile.

The Prevention and Screening domain included *Childhood Immunization Status – Combination 3* and *Immunizations for Adolescents – Combination 1*. Neighborhood's RY 2020 rates for both measures performed at the national Medicaid 75th percentile.

The Women's Health domain included two measures. Neighborhood's RY 2020 performance on the *Cervical Cancer Screening* measure improved from RY 2019 and performed at the national Medicaid 90th percentile. Neighborhood's *Chlamydia Screening in Women* rate performed at the national Medicaid 66.67th percentile.

The Chronic Care domain included two *Comprehensive Diabetes Care* measures, *Tobacco Screening and Cessation* and *HIV Viral Load Suppression*. Of the two *Comprehensive Diabetes Care* measures, the *HbA1c Control (<8.0%)* RY 2020 rate performed at national Medicaid 75th percentile and *HbA1c Poor Control (>9.0%)* RY 2020 rate performed at the national Medicaid 90th percentile.

The Behavioral Health domain included eleven measures. Neighborhood's RY 2020 rate for *Adherence to Antipsychotic Medications for Individuals with Schizophrenia* performed at the national Medicaid 95th percentile; the RY 2020 rate for *Follow-Up after Hospitalization for Mental Illness – 7 Days* performed at the national Medicaid 90th percentile; and the RY 2020 rate for *Follow-Up after Hospitalization for Mental Illness – 30 Days* performed at the national Medicaid 75th percentile. Neighborhood's rates for *Follow-Up Care for Children Prescribed with ADHD Medication – Initiation Phase* and *– Continuation and Maintenance Phase* measures performed at the national Medicaid 66.67th and 50th percentiles, respectively. RY 2020 rates for *Diabetes Screening for People with Schizophrenia or Bipolar Disorder who are using Antipsychotic Medications* and *Follow-Up After Emergency Department Visits for Alcohol and Other Drug Dependence – 7 Days* performed at the national Medicaid 33.33rd percentile.

**Table 16** presents Neighborhood's PGP rates for RY 2019 and RY 2020, as well as the national Medicaid benchmarks.

Table 16: Neighborhood's Performance Goal Program Results, RY 2019-RY 2020<sup>1</sup>

RI Medicaid Managed Care Performance Goal Program Measures	Measure Steward	RY 2019 (MY 2018)	RY 2020 (MY 2019)	2020 Quality Compass (MY 2019) Percentile Met
<b>Utilization</b>				
Well-Child Visits in the First 15 Months of Life (6 or more visits)	NCQA	78.04%	79.17%	90th
Well-Child Visits in the 3 <sup>rd</sup> , 4 <sup>th</sup> , 5 <sup>th</sup> , and 6 <sup>th</sup> Years of Life	NCQA	76.04%	79.00%	66 <sup>th</sup>
<b>Access to Care</b>				
Children and Adolescents' Access to Primary Care Practitioners – 7-11 Years	NCQA	93.45%	95.68%	75th
Children and Adolescents' Access to Primary Care Practitioners – 12-19 Years	NCQA	92.48%	94.24%	75th
Prenatal and Postpartum Care – Timeliness of Prenatal Care	NCQA	93.24%	96.11%	90th
<b>Prevention and Screening</b>				
Childhood Immunization Status – Combination 3	NCQA	78.83%	78.66%	75th
Immunizations for Adolescents – Combination 1	NCQA	87.80%	87.35%	75th
<b>Women's Health</b>				
Cervical Cancer Screening	NCQA	71.04%	74.21%	90th
Chlamydia Screening in Women	NCQA	68.04%	69.65%	66 <sup>th</sup>
<b>Chronic Care</b>				
Comprehensive Diabetes Care – HbA1c Control (<8.0%)	NCQA	60.55%	58.23%	75th
Comprehensive Diabetes Care – HbA1c Poor Control (>9.0%)	NCQA	25.31%	29.87%	95th
Tobacco Screening & Cessation	NQF	4.2%	19.6%	
HIV Viral Load Suppression	NQF		72.4%	
<b>Behavioral Health</b>				
Antidepressant Medication Management – Effective Acute Phase Treatment	NCQA	54.61%	56.91%	50th
Follow-Up After Hospitalization for Mental Illness—7 Days	NCQA	57.14%	54.33%	90th
Follow-Up After Hospitalization for Mental Illness—30 Days	NCQA	76.54%	72.77%	75th
Follow-Up Care for Children Prescribed ADHD Medication—Initiation	NCQA	47.58%	46.91%	66 <sup>th</sup>
Follow-Up Care for Children Prescribed ADHD Medication—Continuation and Maintenance	NCQA	61.12%	56.19%	50th
Diabetes Screening for People with Schizophrenia or Bipolar Disorder who are using Antipsychotic Medications	NCQA	80.25%	80.61%	33 <sup>rd</sup>
Follow-Up After Emergency Department Visits for Alcohol and Other Drug Dependence – 7 Days	NCQA	14.87%	11.31%	33 <sup>rd</sup>
Adherence to Antipsychotic Medications for Individuals with Schizophrenia	NCQA	78.02%	78.20%	95th
Use of First-line Psychosocial Care for Children and Adolescents on Antipsychotics (Total)	NCQA	67.74%	66.28%	50th
Use of Opioids at High Dosage	NCQA	5.27%	6.07%	95th
Use of Opioids from Multiple Providers	NCQA	19.26%	17.85%	95th

## Review of Compliance with Medicaid and CHIP Managed Care Regulations

### Objectives

Title *42 CFR §438.358*, a review must be conducted within the previous 3-year period that determines a plan's adherence to standards established by the state related to member rights and protections, access to services, structure and operations, measurement and improvement, and grievance system standards, as well as applicable elements of EOHHS's MMC provider agreement with the plans.

Per *42 CFR § 438.360*, in place of a Medicaid administrative review by the state, its agent or EQRO, states can use information obtained from a national accrediting organization review for determining plan compliance with standards established by the state to comply with these requirements.

### Technical Methods of Data Collection and Analysis

EOHHS relies on the NCQA Accreditation standards, review process, and findings, in addition to other sources of information, to ensure MCP compliance with many of the structure and operations standards. The state also conducts an annual monitoring review to assess MCP processes and gather data for the State's Performance Goal Program metrics. Further, EOHHS submitted a crosswalk to CMS, pertaining to comparability of NCQA's accreditation standards to the federal regulatory requirements for compliance review, in accordance with *42 CFR §438.360(b)(4)*. This strategy was approved by CMS, with the most recent version being submitted to CMS in December 2014.

IPRO received the approved crosswalk and the results of the NCQA Accreditation Survey from EOHHS for each MCP. IPRO verified MCP compliance with federal Medicaid standards of *42 CFR Part 438 Subpart D* and *Subpart E 438.330*.

### Description of Data Obtained

The *Score Summary Overall Results* presented Accreditation Survey results by category code, standard code, review category title, self-assessed score, current score, issues not met, points received and possible points. The crosswalk provided to IPRO EOHHS included instructions on how to use the crosswalk, a glossary, and detailed explanations on how the NCQA accreditation standards support federal Medicaid standards.

### Conclusions and Findings

Neighborhood's accreditation was granted by NCQA on October 29, 2020. **Table 17** displays the results of Neighborhood's most recent NCQA Accreditation survey. It was determined that Neighborhood was fully compliant with the standards *42 CFR Part 438 Subpart D* and *Subpart E 438.330*.

**Table 17: Evaluation of Compliance with 42 CFR Part 438 Subpart D and QAPI Standards**

Part 438 Subpart D and Subpart E 438.330	Neighborhood Results
438.206: Availability of Services	Met
438.207: Assurances of adequate capacity and services	Met
438.208: Coordination and continuity of care	Met
438.210: Coverage and authorization of services	Met
438.214: Provider selection	Met
438.224: Confidentiality	Met
438.228: Grievance and appeal system	Met
438.230: Sub-contractual relationships and delegation	Met
438.236: Practice guidelines	Met
438.242: Health information systems	Met
438.330: Quality assessment and performance improvement program	Met

## Validation of Network Adequacy

### Objectives

In the absence of a CMS protocol for *42 CFR § 438.358 Activities related to external quality review (b)(1)(iv)*, IPRO assessed MCP compliance with the standards of *42 CFR § 438.358 Network adequacy standards* and Section 2.09.02 of the state's Medicaid Managed Care Services Contract.

MCPs must ensure that a sufficient number of primary and specialty care providers are available to members to allow for a reasonable choice among providers. This is required by federal Medicaid requirements, state licensure requirements, NCQA accreditation standards, and the state's Medicaid Managed Care Services Contract.

Per section *2.08.01 Network Composition* of the Contract, MCPs are required to “establish and maintain a robust geographic network designed to accomplish the following goals:

1. Offer an appropriate range of services, including access to preventive care, primary care, acute care, specialty care, behavioral health care, substance use disorder and long-term services and supports (including nursing homes and home and community-based care) services for the anticipated number of enrollees in the services area;
2. Maintain providers in sufficient number, mix, and geographic areas; and
3. Make available all services in a timely manner. Pursuant to *42 CFR 438.206(c)(3)*, the Contractor will ensure that its contracted providers provide physical access, reasonable accommodations, and accessible equipment for members with physical or mental disabilities.”

Network and appointment timeliness standards included in the State's *Medicaid Managed Care Contract* are displayed in **Table 18**.

**Table 18: Rhode Island Medicaid Managed Care Contract Network Standards**

Network Standards
<b>Time and Distance</b>
▪ Primary Care, Adult and Pediatric Within 20 Minutes or 20 Miles
▪ OB/GYN Within 45 Minutes or 30 Miles
▪ Top 5 Adult Specialties Within 30 Minutes or 30 Miles
▪ Top 5 Pediatric Specialties Within 45 Minutes or 45 Miles

Network Standards	
▪	Hospital Within 45 Minutes or 30 Miles
▪	Pharmacy Within 10 Minutes or 10 Miles
▪	Imaging Within 45 Minutes or 30 Miles
▪	Ambulatory Surgery Centers Within 45 Minutes or 30 Miles
▪	Dialysis Within 30 Minutes or 30 Miles
▪	Adult Prescribers Within 30 Minutes or 30 Miles
▪	Pediatric Prescribers Within 45 Minutes or 45 Miles
▪	Adult Non-Prescribers Within 20 Minutes or 20 Miles
▪	Pediatric Non-Prescribers Within 20 Minutes or 20 Miles
▪	Substance Use Prescribers Within 30 Minutes or 30 Miles
▪	Substance Use Non-Prescribers Within 20 Minutes or 20 Miles
Appointment Standards	
▪	After-Hours Care (telephone) Available 24 Hours a Day, 7 Days a Week
▪	Emergency Care Available Immediately
▪	Urgent Care Within 24 Hours
▪	Routine Care Within 30 Calendar Days
▪	Physical Exam Within 180 Calendar Days
▪	EPSDT Within 6 Weeks
▪	New Member Within 30 Calendar Days
▪	Non-Emergent or Non-Urgent Mental Health or Substance Use Services Within 10 Calendar Days
Member-to-PCP Ratio Standards	
▪	No more than 1,500 members to any single PCP
▪	No more than 1,000 members per single PCP within a PCP team
24 Hour Coverage	
▪	On a 24 hours a day, 7 days a week basis access to medical and behavioral health services must be available to members either directly through the MCP or PCP
Other	
▪	Each Medicaid network should include Patient Centered Medical Homes (PCMH) that serve as PCPs

## Technical Methods of Data Collection and Analysis

IPRO's evaluation was performed using network data submitted by Neighborhood in the *Managed Care Accessibility Analysis* reports as of the end of December 2020. IPRO's evaluation included a comparison of Neighborhood access data to state standards for appointment availability and time and distance. Neighborhood access standards for PCPs is one provider within 20 miles and one provider within 30 miles for OB/GYNs.

Neighborhood's goal is to have 95% of its network of primary care, high-volume, and high-impact providers meet the established distance requirements, as well as to meet provider-to-member ratios. The distance requirements and ratios differ by provider type and county designation.

## Description of Data Obtained

Neighborhood monitors its provider network for accessibility and network adequacy using the GeoAccess software program. This program assigns geographic coordinates to addresses so that the distance between providers and members can be assessed to determine whether members have access to care within a reasonable distance from their homes.



Neighborhood monitors its network's ability to provide timely routine and urgent appointments through secret shopper surveys. The data includes the number of providers surveyed, the number of appointments made and not made, the total number of appointments meeting the timeframe standards and appointment rates.

## Conclusions and Findings

**Table 19** shows the percentage of members for whom the geographic access standards were met. The results of this analysis show that Neighborhood exceeded its geographic accessibility standards for all provider types reported.

**Table 19: GeoAccess Provider Network Accessibility, December 2020**

Provider Type	Access Standard <sup>1</sup>	% of English Speaking Members	% of Spanish Speaking Members
Primary Care Provider (PCP)	1 in 20 miles	100.0%	99.9%
Family Medicine	1 in 20 miles	99.9%	99.9%
Internal Medicine	1 in 20 miles	99.9%	99.9%
Pediatricians	1 in 20 miles	99.9%	99.4%
Cardiology	1 in 30 miles	100.0%	99.9%
Dermatology	1 in 30 miles	100.0%	99.8%
Endocrinology	1 in 30 miles	100.0%	100.0%
Gastroenterology	1 in 30 miles	100.0%	99.7%
Pulmonary	1 in 30 miles	100.0%	99.7%
Oncologists	1 in 30 miles	100.0%	100.0%
Obstetrician/Gynecologists	1 in 30 miles	100.0%	99.8%

<sup>1</sup> The Access Standard is measured in travel time from a member's home to provider offices.

<sup>2</sup> The percentages represent the proportion of members for whom the Access Standards were met.

**Table 20** displays the results of the appointment availability survey conducted by the MCP in the fourth quarter of 2020. Availability of both routine and urgent care appointments was assessed for a variety of provider types.

**Table 20: Appointment Availability for Network Providers, Fourth Quarter of 2020**

Provider Type	Number of Providers Surveyed	Number of Appointments Made	Appointment Rate	Rate of Timely Appointments Made <sup>1</sup>	Mean Number of Days to Appointment
<b>Primary Care</b>					
<b>Routine Appointments</b>					
Family/General Practice	10	0	0.0%	Not Applicable	Not Applicable
Pediatricians	10	2	20.0%	20.0%	9.5
<b>Urgent Appointments</b>					
Family/General/Internal	10	1	10.0%	10.0%	Not reported
Pediatricians	10	0	0.0%	Not Applicable	Not Applicable
<b>Adult Specialty Care</b>					
<b>Routine Appointments</b>					
Cardiology	6	1	16.67%	16.67%	27
Dermatology	6	4	66.67%	66.67%	3.75
Endocrinology	6	1	16.67%	16.67%	1
Gastroenterology	6	2	33.33%	33.33%	6.5
Pulmonary	6	2	33.33%	33.33%	4

Provider Type	Number of Providers Surveyed	Number of Appointments Made	Appointment Rate	Rate of Timely Appointments Made <sup>1</sup>	Mean Number of Days to Appointment
<b>Urgent Appointments</b>					
Cardiology	6	1	16.67%	0.0%	2
Dermatology	6	2	33.33%	0.0%	6
Endocrinology	6	0	0.0%	Not Applicable	Not Applicable
Gastroenterology	6	0	0.0%	Not Applicable	Not Applicable
Pulmonary	6	0	0.0%	Not Applicable	Not Applicable
<b>Pediatric Specialty Care</b>					
<b>Routine Appointments</b>					
Allergy/Immunology	6	3	50.0%	50.0%	4.6
Gastroenterology	6	1	16.67%	0.0%	58
Neurology	6	0	0.0%	Not Applicable	Not Applicable
Orthopedics	6	1	16.67%	16.67%	7
Otolaryngology/ENT	6	0	0.0%	Not Applicable	Not Applicable
<b>Urgent Appointments</b>					
Allergy/Immunology	6	1	16.67%	16.67%	1
Gastroenterology	6	0	0.0%	Not Applicable	Not Applicable
Neurology	6	1	16.67%	16.67%	1
Orthopedics	6	3	50.0%	50.0%	1
Otolaryngology/ENT	6	1	16.67%	16.67%	1
<b>Behavioral Health Care</b>					
<b>Routine Appointments</b>					
Adult Behavioral Health	15	2	13.33%	13.33%	3.5

IPRO's assessment of Neighborhood's strengths and opportunities for improvement related to network adequacy, as well as recommendations to improve **quality, timeliness, and access** are presented in **Section VIII** of this report.

## Administration of Quality of Care Surveys – Member Experience

### Objectives

The EOHHS requires contracted health plans to evaluate and report on member satisfaction annually. Neighborhood utilizes NCQA's CAHPS tool to capture such data. The CAHPS survey is a standardized questionnaire that asks enrollees to report on their experiences with care and services from the MCP, the providers, and their staff.

The overall objective of the CAHPS study is to capture accurate and complete information about consumer-reported experiences with health care. Specifically, the survey aims to measure how well plans are meeting their members' expectations and goals; to determine which areas of service have the greatest effect on members' overall satisfaction; and to identify areas of opportunity for improvement, which can aid plans in increasing the quality of provided care.

Neighborhood independently contracted with a certified CAHPS vendor to administer the adult and child surveys for MY 2020.

## Technical Methods of Data Collection and Analysis

The standardized survey instruments selected were the CAHPS 5.1H Adult Medicaid Health Plan Survey and the CAHPS 5.1H Child Medicaid Health Plan Survey. The CAHPS Medicaid questionnaire set includes separate versions for the adult and child populations.

HEDIS specifications require that the MCPs provide a list of all eligible members for the sampling frame. Following HEDIS requirements for the adult survey, the MCP included members in the sample frame who were 18 years and older (as of December 31 of the MY) who were continuously enrolled in the plan for at least five of the last six months of the MY. Following HEDIS requirements for the child survey, the MCP included parents and guardians of members 17 years and younger (as of December 31 of the measurement year) who were continuously enrolled in the plan for at least five of the last six months of the measurement year in the sample frame.

**Table 21** provides a summary of the technical methods of data collection for the adult and child surveys.

**Table 21: CAHPS Technical Methods of Data Collection, MY 2020**

Data Collection Elements	Neighborhood
<b>Adult CAHPS Survey</b>	
Survey Vendor	SPH Analytics
Survey Tool	5.1H
Survey Timeframe	February 2021-May 2021
Method of Collection	Mail
Sample Size	3,375
Response Rate	17.05%
<b>Child CAHPS Survey</b>	
Survey Vendor	SPH Analytics
Survey Tool	5.1H
Survey Timeframe	February 2021-May 2021
Method of Collection	Mail
Sample Size - General	1980
Response Rate	13.01%

Results were calculated in accordance with HEDIS specifications for survey measures. According to HEDIS specifications, results for the adult and child populations were reported separately, and no weighting or case-mix adjustment was performed on the results.

For the global ratings, composite measures, composite items, and individual item measures the scores were calculated using a 100-point scale. Responses were classified into response categories. **Table 22** displays these categories and the measures which these response categories are used.

**Table 22: CAHPS Response Categories, MY 2020**

Measures	Response Categories
Rating of Health Plan, Rating of All Health Care, Rating of Personal Doctor, and Rating of Specialist	0 to 4 (Dissatisfied) 5 to 7 (Neutral) 8 to 10 (Satisfied)
Getting Needed Care, Getting Care Quickly, How Well Doctors Communicate, and Customer Service composite measures and items; and the Coordination of Care individual item measure	Never (Dissatisfied) Sometimes (Neutral) Usually/Always (Satisfied)

To assess MCP performance, IPRO compared MCP scores to national Medicaid performance reported in the *2021 Quality Compass* (MY 2020) for all lines of business that reported MY 2020 CAHPS data to NCQA.

### Description of Data Obtained

IPRO received a copy of the final MY 2020 study reports produced by the certified CAHPS vendor. These reports included comprehensive descriptions of the project objectives and methodology, as well as MCP-level results and analyses.

### Conclusions and Findings

Overall, member satisfaction among Neighborhood's enrollees in MY 2020 was similar to member satisfaction in MY 2019. There were no statistically significant changes in CAHPS scores observed between MY 2019 and MY 2020.

Of the nine measures reported for the adult survey, NCQA benchmarks were available for eight of these measures. Of the eight scores, six performed above the national Medicaid mean. Specifically, Neighborhood's scores for *Rating of Health Plan* and *Rating of Specialist* performed at the national Medicaid 95th and 90th percentiles, respectively. Neighborhood's scores for *Rating of All Health Care*, *Getting Care Quickly* and *Getting Needed Care* performed at the national Medicaid 75th percentile and the score for *Rating of Personal Doctor* performed at the 50th percentile. Of the remaining scores, two scores performed at the 33.33rd percentile, namely *Customer Service* and *How Well Doctors Communicate*.

Concerning the child survey, Neighborhood's scores for four child measures were not reported due to small sample sizes. Of the four scores reported, only one score performed above the national Medicaid mean. The score for *Rating of Health Plan* performed above the national Medicaid mean and at the national Medicaid 95th percentile. The score for *Rating of Personal Doctor* performed at national Medicaid 33.33rd percentile. Neighborhood's scores for *How Well Doctors Communicate* and *Rating of all Health Care* performed at or below the national Medicaid 10th percentile.

**Table 23** displays the results of the MY 2018, MY 2019 and MY 2020 CAHPS Adult Medicaid Survey administered for Neighborhood, and **Table 24** displays the results of the MY 2018, MY 2019 and MY 2020 CAHPS Child Medicaid Survey.

**Table 23: Neighborhood's Adult CAHPS Results, MY 2018-MY 2020**

Measures	Neighborhood			2021 Quality Compass (MY 2020)	
	2019 CAHPS MY 2018	2020 CAHPS MY 2019	2021 CAHPS MY 2020	National Medicaid Benchmark Met/Exceeded	National Medicaid Mean
Rating of Health Plan <sup>1</sup>	86.15%	85.46%	90.15%	95th	78.32%
Rating of All Health Care	79.04%	77.69%	82.10%	75th	77.63%
Rating of Personal Doctor <sup>1</sup>	83.18%	85.34%	83.19%	50th	83.23%
Rating of Specialist <sup>1</sup>	81.08%	86.27%	88.36%	90th	83.56%
Getting Care Quickly <sup>2</sup>	83.59%	86.16%	85.93%	75th	81.83%
Getting Needed Care <sup>2</sup>	83.95%	87.39%	88.14%	75th	83.58%
Customer Service <sup>2</sup>	91.01%	91.86%	89.17%	33.33 <sup>rd</sup>	88.94%
How Well Doctors Communicate <sup>2</sup>	92.79%	93.79%	92.00%	33.33 <sup>rd</sup>	92.17%
Coordination of Care <sup>2</sup>	86.13%	89.45%	84.32%	No Benchmark	No Benchmark

<sup>1</sup> Rates reflect respondents who gave a rating of 8, 9, or 10 (with 10 being the "best possible").

<sup>2</sup> Rates reflect responses of "always" or "usually."

**Table 24: Neighborhood's Child General Population CAHPS Results, MY 2018-MY 2020**

Measures	Neighborhood			2021 Quality Compass (MY 2020)	
	2019 CAHPS MY 2018	2020 CAHPS MY 2019	2021 CAHPS MY 2020	National Medicaid Benchmark Met/Exceeded	National Medicaid Mean
Rating of Health Plan <sup>1</sup>	92.55%	92.21%	92.53%	95th	86.63%
Rating of All Health Care	88.84%	89.29%	84.5%	<10th	88.91%
Rating of Personal Doctor <sup>1</sup>	91.44%	91.59%	90.22%	33.33 <sup>rd</sup>	90.53%
Rating of Specialist <sup>1</sup>	SS	SS	SS	Not Applicable	87.42%
Getting Care Quickly <sup>2</sup>	89.11%	90.81%	SS	Not Applicable	86.90%
Getting Needed Care <sup>2</sup>	88.17%	89.38%	SS	Not Applicable	85.65%
Customer Service <sup>2</sup>	SS	SS	SS	Not Applicable	88.32%
How Well Doctors Communicate <sup>2</sup>	91.97%	95.51%	91.97%	10th	94.36%

<sup>1</sup> Rates reflect respondents who gave a rating of 8, 9, or 10 (with 10 being the "best possible").

<sup>2</sup> Rates reflect responses of "always" or "usually."

SS: Small sample.

## Administration of Quality of Care Surveys – Provider Satisfaction Survey

### Objectives

The EOHHS requires contracted health plans to evaluate and report on provider satisfaction annually. Neighborhood utilizes the annual provider satisfaction survey to capture such data.

The overall objective of the provider satisfaction survey study is to assess and identify opportunities to improve providers' experience with health plan services and operations, with the goal of influencing members' care experience.

SPH Analytics, a certified CAHPS vendor, administered the provider satisfaction survey on behalf of Neighborhood for MY 2020.

## Technical Methods of Data Collection and Analysis

Neighborhood collaborated with the survey vendor SPH Analytics to conduct the MY 2020 provider satisfaction survey. The 50-question 2020 survey instrument is similar to the 2019 instrument, with one exception: the likelihood to recommend survey measure was updated from a binary yes/no choice to a 0-10 Net Promoter Score.

SPH Analytics followed a mail and Internet with phone follow-up survey methodology to administer the provider satisfaction survey from October to December of 2020. The timing of the survey was shifted from spring 2020 to the fourth quarter of 2020 in an effort to lessen the administrative burden on provider offices during the initial surge of the COVID-19 pandemic. Sampling methodology was similar to that of prior years.

A total of 900 PCPs and specialists having a visit with at least 100 or more unique members between March and September 2019 were surveyed. A total of 108 surveys were completed (55 mail, 34 Internet, and 19 phone), yielding a response rate of 13.0%, significantly lower than the 2019 response rate of 23.4%.

Where possible, Neighborhood results are compared to the SPH Analytics 2019 Medicaid Book of Business benchmarks which consists of data from 106 Medicaid health plans representing 30,348 respondents.

## Description of Data Obtained

IPRO received a copy of the final study report produced by SPH Analytics for Neighborhood and utilized the reported results to evaluate the administration of the 2020 provider satisfaction survey. The report included detailed descriptions of the survey objectives, methodology, and results.

## Conclusions and Findings

The MY 2020 provider survey results for all the reported rates showed an increase in comparison to the rates reported in MY 2019. Neighborhood's rate for the provider satisfaction measure *Overall Satisfaction* for MY 2020 was 73% which demonstrated a 21-percentage point increase in comparison to MY 2019. **Table 25** displays the survey questions and results for MY 2019 and MY 2020.

**Table 25: Provider Satisfaction Performance Summary, MY 2019 and MY 2020**

Measures	Summary Rate Definition	Neighborhood Summary Rate MY 2019	Neighborhood Summary Rate MY 2020	2019 SPHA Medicaid Book of Business Summary Rate
Overall Satisfaction <sup>1</sup>	Well / Somewhat Above Average	52%	73%	68%
Finance Issues		19%	32%	30%
Utilization and Quality management		25%	38%	32%
Network/Coordination of Care		21%	28%	29%
Pharmacy		11%	24%	23%
Health Plan Call Center Staff <sup>2</sup>		35%	51%	37%
Provider Relations		16%	24%	35%

<sup>1</sup> Proportions represent percentage Completely or Somewhat Satisfied.

## VI. NCQA Accreditation

### Objectives

NCQA's Health Plan Accreditation program is considered the industry's gold standard for assuring and improving quality care and patient experience. It reflects a commitment to quality that yields tangible, bottom-line value. It also ensures essential consumer protections, including fair marketing, sound coverage decisions, access to care, and timely appeals.

### Technical Methods of Data Collection and Analysis

The accreditation process is a rigorous, comprehensive, and transparent evaluation process through which the quality of key systems and processes that define a health plan are assessed. Additionally, accreditation includes an evaluation of the actual results the health plan achieved on key dimensions of care, service, and efficacy. Specifically, NCQA reviews the health plan's quality management and improvement, utilization management, provider credentialing and re-credentialing, members' rights and responsibilities, standards for member connections, and HEDIS and CAHPS performance measures.

Beginning with Health Plan Accreditation 2020 and the 2020 HEDIS reporting year, the Health Plan Ratings and Accreditation were aligned to improve consistency between the two activities and to simplify the scoring methodology for Accreditation. An aggregate summary of MCP performance on these two activities is summarized in the NCQA Health Plan Report Cards.

To earn NCQA Accreditation, each MCP must meet at least 80% of applicable points in each standards category, submit HEDIS and CAHPS during the reporting year after the first full year of Accreditation, and submit HEDIS and CAHPS annually thereafter. The standards categories include quality management, population health management, network management, utilization management, credentialing and recredentialing, and member experience.

To earn points in each standards category, MCPs are evaluated on the factors satisfied in each applicable element and earn designation of 'met,' partially met' or 'not met' for each element. Elements are worth one or two points and are awarded based on the following:

- Met = Earns all applicable points (either 1 or 2 points)
- Partially Met = Earns half of applicable points (either 0.5 or 1 point)
- Not Met = Earns no points (0 points)

Within each standards category, the total number of points is added. MCPs achieve one of three accreditation levels based on how they score on each standards category. **Table 26** displays the accreditation determination levels and points needed to achieve each level.

**Table 26: NCQA Accreditation Levels and Points**

Accreditation Status	Points Needed
Accredited	At least 80% of applicable points
Accredited with Provisional Status	Less than 80% but no less than 55% of applicable points
Denied	Less than 55%^ of applicable points

To distinguish quality among the accredited MCPs, NCQA calculates an "overall rating" for each MCP as part of its *Health Plan Ratings* program. The "overall rating" is the weighted average of a MCP's HEDIS and CAHPS measure

ratings, plus Accreditation bonus points (if the plan is Accredited by NCQA), rounded to the nearest half point displayed as stars.

Overall ratings are recalculated annually and presented in the *Health Plan Ratings* that is released every September. However, in response to COVID-19's impact to health plans and the changes to HEDIS and CAHPS for MY 2019, NCQA did not calculate the *Health Plan Ratings 2020*.

The *Health Insurance Plan Ratings 2021* methodology used to calculate an "overall rating" is based on MCP performance on dozens of measures of care and is calculated on a 0–5 scale in half points, with five being the highest. Performance includes these three subcategories (also scored 0–5 in half points):

1. Patient Experience: Patient-reported experience of care, including experience with doctors, services and customer service (measures in the Patient Experience category).
2. Rates for Clinical Measures: The proportion of eligible members who received preventive services (prevention measures) and the proportion of eligible members who received recommended care for certain conditions (treatment measures).
3. NCQA Health Plan Accreditation: For a plan with an Accredited or Provisional status, 0.5 bonus points are added to the overall rating before rounded to the nearest half point and displayed as stars. A plan with an Interim status receives 0.15 bonus points added to the overall rating before rounded to the nearest half point and displayed as stars.

The rating scale and definitions for each are displayed in **Table 27**.

**Table 27: NCQA Health Plan Star Rating Scale**

Ratings	Rating Definition
5	The top 10% of health plans, which are also statistically different from the mean.
4	Health plans in the top one-third of health plans that are not in the top 10% and are statistically different from the mean.
3	The middle one-third of health plans and health plans that are not statistically different from the mean.
2	Health plans in the bottom one-third of health plans that are not in the bottom 10% and are statistically different from the mean.
1	The bottom 10% of health plans, which are also statistically different from the mean.

For 2021 only, NCQA implemented a special "Overall Rating Policy" for NCQA-accredited plans. The *Health Plan Ratings 2021* displays the better of the overall rating score between the *Health Plan Ratings 2019* and *Health Plan Ratings 2021*, for plans with accredited, provisional, and interim status as of June 30, 2021. Individual measures, sub composites and composites continued to be scored and displayed using *Health Plan Rating 2021* performance (i.e., MY 2020 data) for all plans.

## Description of Data Obtained

IPRO accessed the NCQA Health Plan Reports website to review the *Health Plan Report Cards 2021* for Neighborhood. For each MCP, star ratings, accreditation status, plan type and distinctions were displayed. At the MCP-specific pages, information displayed was related to membership size, accreditation status, survey type and schedule, and star ratings for each measure and overall. The data presented here was as of June 30, 2021.



## Conclusions and Findings

Neighborhood was compliant with the state's requirement to achieve and maintain NCQA Accreditation.

Neighborhood achieved overall health plan star ratings of 4.5 out of 5 for the *Health Plan Ratings 2021*. **Table 28** displays Neighborhood's overall health plan star ratings, as well as the ratings for the three overarching categories (patient experience, prevention, and treatment) and their subcategories under review.

**Table 28: Neighborhood's NCQA Rating by Category, 2020**

Performance Measure/Area	Neighborhood's Rating (Highest Possible Star Rating is 5 Stars)
<b>Overall Rating</b>	<b>4.5 stars</b>
<b>Patient Experience</b>	<b>3.5 stars</b>
Getting Care	4 stars
Satisfaction with Plan Physicians	3.5 stars
Satisfaction with Plan Services	5 stars
<b>Prevention</b>	<b>5 stars</b>
Children and Adolescent Well Care	5 stars
Women's Reproductive Health	5 stars
Cancer Screening	4.5 stars
Other Preventive Services	
Chlamydia Screening	4 stars
Flu Shots	5 stars
<b>Treatment</b>	<b>4 stars</b>
Asthma	2 stars
Diabetes	4.5 stars
Heart Disease	4.5 stars
Mental and Behavioral Health	3.5 stars

Note: Getting Need Care includes two measures; Satisfaction with Plan Physicians includes four measures; Satisfaction with Plan Services includes one measure; Children and Adolescent Well-Care includes four measures; Women's Reproductive Health includes two measures; Cancer Screening includes two measures; Other Preventive Services includes two measures; Asthma includes one measure; Diabetes includes five measures; Heart Disease includes five measures; and Mental and Behavioral Health includes 10 measures; and Other Treatment Measures which is not included in the table includes nine measures.

## VII. Neighborhood Health Plan's Response to the 2019 EQR Recommendations

*Title 42 CFR § 438.364 External quality review results (a)(6)* require each annual technical report include “an assessment of the degree to which each MCO, PIHP, PAHP, or PCCM entity has effectively addressed the recommendations for QI made by the EQRO during the previous year’s EQR.” **Table 29** displays the assessment categories used by IPRO to describe MCP progress towards addressing the to the 2019 EQR recommendations. **Table 30** display’s Neighborhood’s progress related to the *Neighborhood Health Plan’s Annual External Quality Review Technical Report, Reporting Year 2019*, as well as IPRO’s assessment of Neighborhood’s response.

**Table 29: MCP Response to Recommendation Assessment Levels**

Assessment Determinations and Definitions
<b>Addressed</b>
MCP’s quality improvement response resulted in demonstrated improvement.
<b>Partially Addressed</b>
MCP’s quality improvement response was appropriate; however, improvement is still needed.
<b>Remains an Opportunity for Improvement</b>
MCP’s quality improvement response did not address the recommendation; improvement was not observed, or performance declined.

**Table 30: IPRO’s Assessment of Neighborhood’s Response to the 2019 EQR Recommendations**

2019 EQR Recommendation	IPRO’s Assessment of MCP Response
To improve timeliness and access, Neighborhood should continue monitoring the access and availability of routine and urgent care appointments. In 2019, all provider types surveyed had an appointment rate at or below 50%, Neighborhood should re-educate network providers of appointment standards and request providers submit a plan of correction should standards continue to not be met.	Partially Addressed
The QIPs were comprised of multi-faceted intervention strategies that targeted members, providers, and Health Plan systems and processes. Opportunities for improvement remain for all of the QIPs, as the Health Plan did not achieve the established project goals for some of the indicators. Neighborhood should continuously monitor the effectiveness of the interventions implemented for the QIPs. Many of the interventions are passive in nature (i.e., automated messaging, newsletters, etc.). The Health Plan should consider developing and initiating more active interventions. The Health Plan should also include additional provider focused interventions.	Addressed

## VIII. Strengths, Opportunities and 2020 Recommendations Related to Quality, Timeliness and Access

The MCP's strengths and opportunities for improvement identified during IPRO's EQR of the activities described are enumerated in this section. For areas needing improvement, recommendations to improve the **quality** of, **timeliness** of and **access** to care are presented. These three elements are defined as:

- **Quality** is the degree to which an MCP increases the likelihood of desired health outcomes of its enrollees through: (1) its structural and operational characteristics. (2) The provision of health services that are consistent with current professional, evidence-based knowledge. (3) Interventions for performance improvement. (42 CFR 438.320 Definitions.)
- **Timeliness** is the MCP's capacity to provide care quickly after a need is recognized. (Office of Disease Prevention and Health Promotion, U.S. Department of Health and Human Services)
- **Access** is the timely use of services to achieve health optimal outcomes, as evidenced by MCPs successfully demonstrating and reporting on outcome information for the availability and timeliness elements. (42 CFR 438.320 Definitions.)

The strengths and opportunities for improvement based on the MCP's 2020 performance, as well recommendations for improving **quality**, **timeliness**, and **access** to care are presented in **Table 31**. In this table, links between strengths, opportunities, and recommendations to **quality**, **timeliness** and **access** are made by IPRO (indicated by 'X'). In some cases, IPRO determined that there were no links between these elements (indicated by shading). Unless otherwise noted, the benchmarks referenced in this table derive from NCQA's *Quality Compass 2021* for Medicaid (National – All Lines of Business [Excluding PPOs and EPOs]) and represent the performance of all health plans that reported Medicaid HEDIS data to NCQA for HEDIS MY 2020.

**Table 31: Strengths, Opportunities and Recommendations for Improvement, 2020**

EQR Activity	EQRO Assessment/Recommendation	Quality	Timeliness	Access
<b>Strengths</b>				
NCQA Accreditation	Neighborhood maintained NCQA accreditation in 2020.	X	X	X
QIPS – General	Six of six QIPs pass PIP validation.			
QIPS – Developmental Screening	All performance indicators exceeded the goal rate in MY 2020.	X	X	X
Performance Measures	Neighborhood met all IS and validation requirements to successfully report HEDIS data to EOHHS and NCQA.			
	Neighborhood reported MY 2020 HEDIS rates that exceeded the national MY 2020 Medicaid mean for all three Use of Services rates, six Effectiveness of Care rates and all five Access and Availability rates.	X	X	X
Compliance with Medicaid Standards	Neighborhood is fully compliant with the federal Medicaid standards.	X	X	X
Network Adequacy	Neighborhood's appointment availability for network providers met the state standard for number of days to		X	X

EQR Activity	EQRO Assessment/Recommendation	Quality	Timeliness	Access
	schedule an urgent pediatric care (all specialties) and behavioral health appointment.			
Quality of Care Surveys – Member Satisfaction	Six adult MY 2020 CAHPS scores exceeded the national Medicaid mean.	X		X
Quality of Care Surveys – Provider Satisfaction	Of the seven rates reported in the provider satisfaction survey, all reported rates in MY 2020 demonstrated an increase in comparison to the rates reported in MY 2019.			
<b>Opportunities for Improvement</b>				
QIPs	Of the six QIPs conducted by Neighborhood, five QIPs had one or more indicators that did not meet the benchmark goal.	X	X	X
Performance Measures	One of Neighborhood's MY 2020 HEDIS rates related to diabetes care did not meet the national Medicaid MY 2020 mean and performed at the 25th percentile national Medicaid mean.	X	X	X
Quality of Care Surveys – Member Satisfaction	Two adult MY 2020 CAHPS scores benchmarked below the national Medicaid 50th percentile. Three child MY 2020 CAHPS scores benchmarked below the national Medicaid 50th percentile.	X		X
Quality of Care Surveys – Provider Satisfaction	Satisfaction with provider relations was identified as an area need improvement.			
Network Adequacy	Neighborhood's reported mean number of days to an appointment for urgent adult specialty care did not meet the 24-hour standard for any specialty evaluated.		X	X
<b>Recommendations to Neighborhood to Address Quality, Timeliness and Access</b>				
QIPs	Neighborhood should investigate opportunities to improve the current interventions as five of the six QIPs did not achieve the goal rates. Neighborhood should continue to monitor the effectiveness of their multi-faceted intervention strategies, including member-focused, provider-focused and MCP-focused interventions.	X	X	X
Performance Measures	Neighborhood should investigate opportunities to improve the health of members with diabetes.	X	X	X
Compliance with Medicaid Standards	None.			
Network Adequacy	Neighborhood should investigate opportunities to improve adult access to urgent care as none of the specialties reported met the 24-hour standard.		X	X
Quality of Care Surveys – Member Satisfaction	Neighborhood should evaluate the adult and child CAHPS scores to identify opportunities to improve member experience with the MCP.	X		X

EQR Activity	EQRO Assessment/Recommendation	Quality	Timeliness	Access
Quality of Care Surveys – Provider Satisfaction	Neighborhood should monitor the effectiveness of the planned interventions outlined in the 2020 Provider Satisfaction Survey Summary and modify interventions as needed.			

## Appendix A: NCQA Quality Improvement Activity Form

### QUALITY IMPROVEMENT FORM NCQA Quality Improvement Activity Form

Activity Name:	
Section I: Activity Selection and Methodology	
A. Rationale. Use objective information (data) to explain your rationale for why this activity is important to members or practitioners <i>and</i> why there is an opportunity for improvement.	
B. Quantifiable Measures. List and define <i>all</i> quantifiable measures used in this activity. Include a goal or benchmark for each measure. If a goal was established, list it. If you list a benchmark, state the source. Add sections for additional quantifiable measures as needed.	
Quantifiable Measure #1:	
Numerator:	
Denominator:	
First measurement period dates:	
Baseline Benchmark:	
Source of benchmark:	
Baseline goal:	
Quantifiable Measure #2:	
Numerator:	
Denominator:	
First measurement period dates:	
Benchmark:	
Source of benchmark:	
Baseline goal:	
Quantifiable Measure #3:	
Numerator:	
Denominator:	
First measurement period dates:	
Benchmark:	
Source of benchmark:	
Baseline goal:	
C. Baseline Methodology.	

<b>C.1 Data Sources.</b>				
<input type="checkbox"/> Medical/treatment records <input type="checkbox"/> Administrative data: <input type="checkbox"/> Claims/encounter data <input type="checkbox"/> Complaints <input type="checkbox"/> Appeals <input type="checkbox"/> Telephone service data <input type="checkbox"/> Appointment/access data <input type="checkbox"/> Hybrid (medical/treatment records and administrative) <input type="checkbox"/> Pharmacy data <input type="checkbox"/> Survey data (attach the survey tool and the complete survey protocol) <input type="checkbox"/> Other (list and describe): The Plan also uses a local access database to track all pregnant members as part of our Healthy First Steps Program. Although this database was not used as an administrative database from NCQA perspective, it was used by local Plan team members to identify and outreach to pregnant members. In addition, we used this database to track number of members who participated in our Diaper Reward Program.				
<b>C.2 Data Collection Methodology. Check all that apply and enter the measure number from Section B next to the appropriate methodology.</b>				
If medical/treatment records, check below: <input type="checkbox"/> Medical/treatment record abstraction If survey, check all that apply: <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"/> Incentive provided <input type="checkbox"/> Other (list and describe):		If administrative, check all that apply: <input type="checkbox"/> Programmed pull from claims/encounter files of all eligible members <input type="checkbox"/> Programmed pull from claims/encounter files of a sample of members <input type="checkbox"/> Complaint/appeal data by reason codes <input type="checkbox"/> Pharmacy data <input type="checkbox"/> Delegated entity data <input type="checkbox"/> Vendor file <input type="checkbox"/> Automated response time file from call center <input type="checkbox"/> Appointment/access data <input type="checkbox"/> Other (list and describe):		
<b>C.3 Sampling. If sampling was used, provide the following information.</b>				
<b>Measure</b>	<b>Sample Size</b>	<b>Population</b>	<b>Method for Determining Size (describe)</b>	<b>Sampling Method (describe)</b>
<b>C.4 Data Collection Cycle.</b>			<b>Data Analysis Cycle.</b>	
<input type="checkbox"/> Once a year <input type="checkbox"/> Twice a year <input type="checkbox"/> Once a season <input type="checkbox"/> Once a quarter <input type="checkbox"/> Once a month <input type="checkbox"/> Once a week <input type="checkbox"/> Once a day <input type="checkbox"/> Continuous <input type="checkbox"/> Other (list and describe): Annual HEDIS data collection in Spring, and interim measure in Summer preceding close of the HEDIS 2008 year (Summer 2007)			<input type="checkbox"/> Once a year <input type="checkbox"/> Once a season <input type="checkbox"/> Once a quarter <input type="checkbox"/> Once a month <input type="checkbox"/> Continuous <input type="checkbox"/> Other (list and describe): _____ _____	

<b>C.5 Other Pertinent Methodological Features.</b> Complete only if needed.							
<b>D. Changes to Baseline Methodology.</b> Describe any changes in methodology from measurement to measurement.							
Include, as appropriate: I. Measure and time period covered II. Type of change III. Rationale for change IV. Changes in sampling methodology, including changes in sample size, method for determining size, and sampling method V. Any introduction of bias that could affect the results							
Section II: Data/Results Table Complete for each quantifiable measure; add additional sections as needed.							
<b>#1 Quantifiable Measure:</b>							
Time Period Measurement Covers	Measurement	Numerator	Denominator	Rate or Results	Comparison Benchmark	Comparison Goal	Statistical Test and Significance*
	<i>Baseline:</i>						
<b>#2 Quantifiable Measure:</b>							
Time Period Measurement Covers	Measurement	Numerator	Denominator	Rate or Results	Comparison Benchmark	Comparison Goal	Statistical Test and Significance*
	<i>Baseline:</i>						
<b>#3 Quantifiable Measure:</b>							
Time Period Measurement Covers	Measurement	Numerator	Denominator	Rate or Results	Comparison Benchmark	Comparison Goal	Statistical Test and Significance*
	<i>Baseline:</i>						

\* If used, specify the test, p value, and specific measurements (e.g., baseline to remeasurement #1, remeasurement #1 to remeasurement #2, etc., or baseline to final remeasurement) included in the calculations. NCQA does not require statistical testing.



<b>Section III: Analysis Cycle</b> Complete this section for EACH analysis cycle presented.			
<b>A. Time Period and Measures That Analysis Covers.</b>			
<b>B. Analysis and Identification of Opportunities for Improvement.</b> Describe the analysis and include the points listed below.			
<i>B.1 For the quantitative analysis:</i>			
<i>B.2 For the qualitative analysis:</i> <ul style="list-style-type: none"> <li>▪ <u>Opportunities identified through the analysis</u></li> <li>▪ <u>Impact of interventions</u></li> <li>• <u>Next steps</u></li> </ul>			
<b>Section IV: Interventions Table</b>			
<b>Interventions Taken for Improvement as a Result of Analysis.</b> List chronologically the interventions that have had the most impact on improving the measure. Describe only the interventions and provide quantitative details whenever possible (e.g., "hired 4 UM nurses" as opposed to "hired UM nurses"). Do not include intervention planning activities.			
Date Implemented (MM / YY)	Check if Ongoing	Interventions	Barriers That Interventions Address
<b>Section V: Chart or Graph (Optional)</b>			
Attach a chart or graph for any activity having more than two measurement periods that shows the relationship between the timing of the intervention (cause) and the result of the remeasurements (effect). Present one graph for each measure unless the measures are closely correlated, such as average speed of answer and call abandonment rate. Control charts are not required, but are helpful in demonstrating the stability of the measure over time or after the implementation.			

## Appendix B: Rhode Island Medicaid Managed Care Quality Strategy, 2019-2022

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# **RHODE ISLAND MEDICAID MANAGED CARE QUALITY STRATEGY**

## **Rhode Island Executive Office of Health and Human Services**

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**July 31, 2019**

# Section 1: RI Medicaid Managed Care Overview

## Section 1.1 Overview

For over 25 years, Rhode Island (RI) has utilized managed care as a strategy for improving access, service integration, quality and outcomes for Medicaid beneficiaries while effectively managing costs. Most RI Medicaid members are enrolled in managed care for at least acute care, including behavioral health services, and most children are enrolled in both a managed care organization (MCO) and in the dental Prepaid Ambulatory Health Plan (PAHP). Similar to the state's rationale for managed medical and behavioral health services, the managed dental program (Rite Smiles) was designed to increase access to dental services, promote the development of good oral health behaviors, decrease the need for restorative and emergency dental care, and better manage Medicaid expenditures for oral health care.

To achieve its goals for improving the quality and cost-effectiveness of Medicaid services for beneficiaries, over time Rhode Island has increasingly transitioned from functioning simply as a payer of services to becoming a purchaser of medical, behavioral, and oral health delivery systems. Among other responsibilities, the contracted managed care entities (MCEs) program are charged with:

- ensuring a robust network beyond safety-net providers and inclusive of specialty providers,
- increasing appropriate preventive care and services, and
- assuring access to care and services consistent with the state Medicaid managed care contract standards, including for children with special health care needs.

In the context of reinventing Medicaid, expansion and health system transformation, RI Medicaid continues to achieve and sustain national recognition for the quality of services provided. The State contracts with three MCOs that are consistently ranked among the top Medicaid plans nationally according to the National Committee for Quality Assurance (NCQA).<sup>1</sup> RI Medicaid operates a Medicaid-Medicare Plan with one of its MCOs to serve dually-eligible members in managed care. In addition, RI Medicaid contracts with one dental plan. Rhode Island does not contract with any Prepaid Inpatient Health Plans (PIHP).

RI Medicaid's Managed Care Quality Strategy is required by the Medicaid Managed Care rule, 42 CFR 438 Subpart E.<sup>2</sup> This strategy focuses on RI Medicaid's oversight of MCO and PAHP compliance and quality performance to monitor the quality of care provided to Medicaid and CHIP members.<sup>3</sup> RI Medicaid will work with CMS to ensure that the Quality Strategy meets all content requirements set forth in 42 CFR 438.340 (c)(2).

Throughout this document, the MCOs and the PAHP will be collectively referred to as Managed Care Entities (MCEs), unless otherwise noted. Demonstrating compliance with federal managed care rules, this revised Quality Strategy reflects RI Medicaid's objective to transition to a state-wide collaborative framework for quality improvement activities, including measurement development, data collection, monitoring, and evaluation.

<sup>1</sup> <http://healthinsuranceratings.ncqa.org/2018/search/Medicaid>

<sup>2</sup> This Quality Strategy incorporates CMS guidance from its initial "Quality Considerations for Medicaid and CHIP programs," communicated by CMS in its [November 2013 State Health Official Letter](#) and the [Quality Strategy Toolkit for States](#).

<sup>3</sup> Throughout this document, reference to Medicaid managed care programs and members also includes CHIP members served under the same managed care programs and contracts.

Rhode Island contracts with IPRO, a qualified External Quality Review Organization (EQRO) to conduct external quality reviews (EQRs) of its MCEs in accordance with 42 CFR 438.354.

## **Section 1.2 Rhode Island Medicaid and CHIP**

The Executive Office of Health and Human Services (EOHHS) is the single state agency for Rhode Island's Medicaid program and, as such, is responsible for the fiscal management and administration of the Medicaid program. As health care coverage funded by CHIP is administered through the State's Medicaid program, the EOHHS also serves as the CHIP State Agency under Federal and State laws and regulations.

In 2019, over 317,000 Rhode Island residents are covered by Medicaid under one of the following eligibility categories:

- Adults with incomes up to 138 percent of poverty,
- Pregnant women with household incomes up to 253 percent of poverty,
- Children with household incomes up to 261 percent of poverty, and
- Persons eligible under categories for persons who are aged, blind, or those with a disability.

After the state expanded Medicaid eligibility under the Affordable Care Act, Rhode Island's total Medicaid population increased rapidly, and its uninsured rate dropped to less than four percent. Today, Medicaid is the state's largest health care purchaser covering one out of four Rhode Islanders in a given year. The Medicaid Program constitutes the largest component of the state's annual budget, State General Revenue expenditures are expected to reach \$2.9 billion in State Fiscal Year (SFY) 2018.

In the context of reinventing Medicaid, expansion and health system transformation, RI Medicaid continues to achieve and sustain national recognition for the quality of services provided. The State contracts with MCOs that are consistently ranked among the top Medicaid plans nationally according to the National Committee for Quality Assurance (NCQA).<sup>4</sup>

## **Section 1.3 History of Medicaid Managed Care Programs**

The State's initial Medicaid and CHIP managed care program, Rite Care, began in 1994. As shown in Table 1 below, in the 25 years since, there has been a steady increase in the managed care populations and services, including carving in behavioral health services and serving populations with more complex needs.

<sup>4</sup> <http://healthinsuranceratings.ncqa.org/2018/search/Medicaid>

**Table 1 Rhode Island Medicaid Managed Care Program Additions**

Year	Managed Care Program Additions
1994	Rlte Care SCHIP
2000	Children in Substitute Care Rlte Share
2003	Children with Special Needs Rlte Smiles
2008	Rhody Health Partners
2014	Medicaid Expansion Behavioral Health carved in to managed care
2015	Accountable Entities Pilot
2016	Medicare-Medicaid Plan (MMP)
2018	MCO-Certified Accountable Entities APMs

Today, RI Medicaid and CHIP beneficiaries enrolled in managed care entities include children and families; children in substitute care;<sup>5</sup> children with special health care needs; aged, blind, and disabled adults; low-income adults without children; adults with dual Medicare and Medicaid coverage; and adults who need long-term services and supports (LTSS).

This increase in Medicaid managed care population and services has led RI Medicaid to progressively transition from a fee-for-service claims payer to a more active purchaser of care. Central to this transition has been the state's focus on improved access to and quality of care for Medicaid beneficiaries along with better cost control. Rhode Island Medicaid is committed to managed care as a primary vehicle for the organization and delivery of covered services to eligible Medicaid beneficiaries.

<sup>5</sup> Under the provisions of Rhode Island's 1115 waiver, enrollment in managed care is mandatory for each of these populations except for children in legal custody of the State Department of Children, Youth and Families referenced as Children in Substitute Care.

## Section 1.4 Medicaid and CHIP Managed Care in 2019

Approximately 90 percent of Medicaid and CHIP members are enrolled in managed care entities for acute care and/or for dental services. Currently, RI Medicaid contracts with three MCOs and one managed dental health plan. These risk-based managed care contractors are paid per member per month (PMPM) capitation arrangements and include the following MCEs:

- **MCOs:** Rhode Island's three MCOs include: Neighborhood Health Plan of Rhode Island (Neighborhood); United Healthcare Community Plan of Rhode Island (UHC-RI), and Neighborhood Health Public Plan (Neighborhood). Neighborhood and UHC-RI began accepting Medicaid members in Rhode Island's initial managed care program in 1994. Neighborhood began accepting RI Medicaid members in July 2017. MCOs enroll Medicaid beneficiaries in the following lines of business (LOBs):
  - Rlte Care Core (children and families)
  - Rlte Care Substitute Care (children in substitute care)
  - Rlte Care CSHCN (children with special healthcare needs)
  - Rhody Health Expansion (low-income adults without children)
  - Rhody Health Partners (aged, blind, disabled adults)
- **Dental MCE:** The state contracts with United Healthcare Dental to manage the Rlte Smile dental benefits for children enrolled in Medicaid. Enrollment in United Healthcare Dental began in 2006 for children born on or after May 1, 2000.

For RI Medicaid beneficiaries that are determined eligible, long-term services and supports (LTSS) are offered through a variety of delivery systems. RI Medicaid programs for persons dually eligible for Medicare and/or meeting high level of care determinations, including eligibility for LTSS include:

- **Medicare-Medicaid Plan (MMP) Duals:** EOHHS, in partnership with CMS and Neighborhood launched an innovative program in 2016 that combined the benefits of Medicare and Medicaid into one managed care plan to improve care for some of the state's most vulnerable residents. Enrollment in MMP duals is voluntary and covered benefits include Medicare Part A, B, and D, and Medicaid Services (including LTSS for those who qualify). (Dental Care and transportation are covered out-of-plan).
- **Program for All Inclusive Care for the Elderly (PACE)** is a small voluntary program for qualifying eligible individuals over age 55 who require a nursing facility level of care. PACE provides managed care through direct contracts with PACE providers rather than through MCEs.

Table 2 displays MCO and PAHP enrollment in RI Medicaid managed care as of January 2019.

Table 2: Enrollment in Medicaid and CHIP Managed care as of January 2019

Managed Care Program	Members Enrolled in Program	Eligible MCEs
RIte Care Core (children and families)	157,376	Neighborhood Neighborhood UHC-RI
RIte Care Substitute Care (children in substitute care)	2,631	Neighborhood
RIte Care CSHCN (children with special healthcare needs)	6,967	Neighborhood Neighborhood UHC-RI
Rhody Health Expansion (low income adults without children)	71,456	Neighborhood Neighborhood UHC-RI
Medicare/Medicaid Plan	15,777	Neighborhood
Grand Total MCO Members	264,841	
Dental PAHP Members Rite Smiles	114,101	United Healthcare

## Section 2: Guiding Principles, Goals and Objectives

### Section 2.1 Medicaid Guiding Principles and Accountable Entities

Rhode Island's Medicaid managed care program is dedicated to improving the health outcomes of the state's diverse Medicaid and CHIP population by providing access to integrated health care services that promote health, well-being, independence and quality of life.

In 2015, Governor Gina Raimondo established the "Working Group to Reinvent Medicaid," tasked with presenting innovative recommendations to modernize the state's Medicaid program and increase efficiency. The Working Group established **four guiding principles**:

- pay for value, not volume,
- coordinate physical, behavioral, and long-term health care,
- rebalance the delivery system away from high-cost settings, and
- promote efficiency, transparency and flexibility.

*Rhode Island's vision, as expressed in the Reinventing Medicaid report is for "...a reinvented Medicaid in which our Medicaid managed care organizations (MCOs) contract with Accountable Entities (AEs), integrated provider organizations that will be responsible for the total cost of care and healthcare quality and outcomes of an attributed population."*

In alignment with its guiding principles, RI Medicaid developed the AE program as a core part of its managed care quality strategy. AEs are Rhode Island's version of an accountable care organization. AEs represent interdisciplinary



partnerships between providers with strong foundations in primary care that also work to address services outside of the traditional medical model which includes behavioral health and social support services. Medicaid MCOs are required to enter into Alternative Payment Model (APM) arrangements with certified AEs. As of early 2019, RI Medicaid has certified six Comprehensive AEs as part of its Health System Transformation Project (HTSP).

RI Medicaid created the AE Initiative to achieve the following goals in Medicaid managed care:<sup>6</sup>

1. transition Medicaid from fee for service to value-based purchasing at the provider level
2. focus on Total Cost of Care (TCOC)
3. create population-based accountability for an attributed population
4. build interdisciplinary care capacity that extends beyond traditional health care providers
5. deploy new forms of organization to create shared incentives across a common enterprise, and
6. apply emerging data capabilities to refine and enhance care management, pathways, coordination, and timely responsiveness to emergent needs.

The state's MCO contracts stipulate that only Rhode Island residents who are not eligible for Medicare and are enrolled in Medicaid managed care plans are eligible to participate in the AE Program. In early 2019, qualified

<sup>6</sup> RI Medicaid Accountable Entity Roadmap [http://www.eohhs.ri.gov/Portals/0/Uploads/Documents/Acc\\_Entities/AERoadmap041117v6.pdf](http://www.eohhs.ri.gov/Portals/0/Uploads/Documents/Acc_Entities/AERoadmap041117v6.pdf)

APM contracts were in place between five AEs and two Medicaid MCOs. Combined, close to 150,000 RI Medicaid managed care members are attributed to an AE. These RI Medicaid members include participants in the following programs: Rlte Care, Rhody Health Partners, and the Rhody Health Expansion Population. RI Medicaid contracts directly with the MCO, certifies the AEs and works closely with the dyads to improve quality as outlined in the 1115 waiver. More information on AEs is included in *Section 7: Delivery System Reform*.

## Section 2.2 Quality Strategy Goals

Evolving from the state’s guiding principles, RI Medicaid established eight core goals for its Managed Care Quality Strategy from 2019-2022 as depicted in Table 3 below.

<b>Table 3: Managed Care Quality Strategy Goals</b>
1. Maintain high level managed care performance on priority clinical quality measures
2. Improve managed care performance on priority measures that still have room for improvement (i.e., are not ‘topped out’)
3. Improve perinatal outcomes
4. Increase coordination of services among medical, behavioral, and specialty services and providers
5. Promote effective management of chronic disease, including behavioral health and comorbid conditions
6. Analyze trends in health disparities and design interventions to promote health equity
7. Empower members in their healthcare by allowing more opportunities to demonstrate a voice and choice
8. Reduce inappropriate utilization of high-cost settings

This strategic quality framework will be used as a tool for RI Medicaid to better facilitate alignment of agency- wide initiatives that assess managed care progress to date and identify opportunities for improvement to better serve RI Medicaid and CHIP managed care populations in a cost-effective manner. Each of the eight managed care goals is aligned with one or more quality objectives outlined in **Section 1.7**

In its managed care programs, RI Medicaid employs standard measures that have relevance to Medicaid- enrolled populations. Rhode Island has a lengthy experience with performance measurement via collecting and reporting on HEDIS<sup>7</sup> measures for each managed care subpopulation it serves. RI Medicaid also requires its managed care plans to conduct Consumer Assessment of Healthcare Providers and Systems (CAHPS)<sup>8</sup> 5.0 surveys. During this quality strategy period, RI Medicaid will focus on strengthening its current MCE measurement and monitoring activities and benchmarks to continually improve performance and achieve the goals of Medicaid managed care. RI Medicaid will also implement and continually improve AE performance measurement specifications, benchmarks and incentives, consistent with the goals of the AE initiative and this Quality Strategy.

<sup>7</sup> HEDIS is a registered trademark of the National Committee for Quality Assurance (NCQA).

<sup>8</sup> CAHPS surveys are developed by the Agency for Healthcare Research and Quality (AHRQ), a government organization and administered by qualified vendors. <https://www.ahrq.gov/cahps/index.html>

## Section 2.3 Quality Strategy Objectives

To support achievement of the Quality Strategy goals, RI Medicaid has established specific objectives as identified in Table 3 below. The state has developed objectives to focus state, MCE and other activities on interventions likely to result in progress toward the eight managed care goals. The right column of the table depicts how each objective aligns with one or more referenced managed care goals as numbered in **Section 2.2**.

<b>Table 3: Managed Care Quality Objectives</b>	<b>Aligned with Goal #</b>
A. Continue to work with MCEs and the EQRO to collect, analyze, compare and share clinical performance and member experience across plans and programs.	1-8
B. Work collaboratively with MCOs, AEs, OHIC and other stakeholders to strategically review and modify measures and specifications for use in Medicaid managed care quality oversight and performance incentives. Establish consequences for declines in MCE performance.	1
C. Create non-financial incentives such as increasing transparency of MCE performance through public reporting of quality metrics & outcomes – both online & in person.	1,2
D. Review and potentially modify financial incentives (rewards and/or penalties) for MCO performance to benchmarks and improvements over time.	1-5
E. Work with MCOs and AEs to better track and increase timely, appropriate preventive care, screening, and follow up for maternal and child health.	3, 6, 8
F. Incorporate measures related to screening in managed care and increase the use of screening to inform appropriate services.	3, 4, 5, 6, 8
G. Increase communication and the provision of coordinated primary care and behavioral health services in the same setting for members attributed to AEs.	4,5,8
H. Monitor and assess MCO and AE performance on measures that reflect coordination including: follow up after hospitalization for mental health and data from the new care management report related to percentage/number of care plans shared with PCPs.	4,5,8
I. Develop a chronic disease management workgroup and include state partners, MCEs and AEs, to promote more effective management of chronic disease, including behavioral health and co-morbid conditions.	5,8
J. Review trend for disparity-sensitive measures and design interventions to improve health equity, including working with MCOs and AEs to screen members related to social determinants of health and make referrals based on the screens.	6
K. Share and aggregate data across all RI HHS agencies to better address determinants of health. Develop a statewide workgroup to resolve barriers to data-sharing.	6
L. Continue to require plans to conduct CAHPS 5.0 surveys and annually share MCO CAHPS survey results with the MCAC.	7
M. Explore future use of a statewide survey to assess member satisfaction related to AEs, such as the Clinician Group (CG-CAHPS) survey for adults and children receiving primary care services from AEs.	7
N. Explore use of focus groups to solicit additional member input on their experiences & opportunities for improvement.	7

## Section 3: Development and Review of Quality Strategy

### Section 3.1 Quality Management Structure

The EOHHS is designated as the administrative umbrella that oversees and manages publicly funded health and human services in Rhode Island, with responsibility for coordinating the organization, financing, and delivery of services and supports provided through the State's Department of children, Youth and Families (DCYF), the Department of Health (DOH), the Department of Human Services (DHS) including the divisions of Elderly Affairs and Veterans Affairs, and the Department of Mental Healthcare, Developmental Disabilities and Hospitals (BHDDH). Serving as the State's Medicaid agency, EOHHS has responsibility for the State's Comprehensive 1115 Demonstration.

RI Medicaid oversees and monitors all contractual obligations of the MCEs to further enhance the goals of improving access to care, promote quality of care and improve health outcomes while containing costs. RI Medicaid also provides technical assistance to MCEs and when necessary takes corrective action to enhance the provision of high quality, cost-effective care.

Medicaid Quality functions include:

1. measurement selection and/or development,
2. data collection,
3. data analysis and validation,
4. identification of performance benchmarks,
5. presentation of measurement and analysis results, including changes over time, and
6. quality improvement activities.

The above functions are conducted at different levels including: RI Medicaid program level, the MCE level, the AE level, and the provider level, where appropriate and feasible. The cadence of each activity aligns with federal guidelines and best practices. The RI Medicaid managed care quality strategy demonstrates an increase in alignment of priorities and goals across state agencies and Medicaid MCEs. This quality strategy will continue to evolve in the next few years to increase the strategic focus and measurement linked to state objectives for managed care.

RI Medicaid conducts oversight and monitoring meetings with all managed care entities. These monthly meetings are conducted separately with each of the MCEs. Meeting agendas focus on routine and emerging items accordingly. The following content areas are addressed on at least a quarterly basis:

- managed care operations
- quality measurement, benchmarks, and improvement
- managed care financial performance
- Medicaid program integrity

RI Medicaid utilizes a collaborative approach to quality improvement activities at the State level. RI Medicaid coordinates with state partners across health and human services agencies. On a routine basis, representatives

from DCYF, BHDDH, DOH join RI Medicaid in routine oversight activities to lend their expertise related to subject matter and populations served. This collaborative approach has proven to be sustainable and efficient.

As part of the 2019-2022 Quality Strategy, the 1115 Quality and Evaluation Workgroup with state partners will be crucial to monitoring various quality improvement efforts occurring within the broad array of Medicaid programming, sharing lessons learned, and discussing quality and evaluation efforts on the horizon.

In addition to managed medical care, there is also state oversight of the managed dental care provided to Medicaid managed care members. The focus of the RI Medicaid dental quality strategy continues to be on ensuring access to preventive dental services for members under age 21 and effective collaboration between state partners. Along with the RI Medicaid dental contract oversight, the DOH regulates the utilization review and quality assurance, or quality management (UR/QA) functions of all licensed Dental Plans, including Rite Smiles. The Medicaid managed dental plan contractor must comply with all DOH UR/QA standards as well as specific standards described in the dental contract.

### **Section 3.2 Review and Update of the Quality Strategy**

RI Medicaid will conduct an annual review of the Medicaid Managed Care Quality Strategy and complete an update to its quality strategy as needed but not less frequently than every three years. As part of the review, RI Medicaid and its contracted MCEs will meet with interested parties, state partners, and consumer advisors to share annual EQRO results and other data to assess the strategy's effectiveness.

To obtain the input of recipients and other stakeholders in the development of the strategy and make the strategy available for public comment before adopting it in final, the State put the proposed Medicaid Managed Care Quality Strategy on the March 2019 agenda of the Medical Care Advisory Committee (MCAC) for discussion. In April 2019, Rhode Island will post the final draft Medicaid Managed Care Quality Strategy on the RI EOHHS Website for 30 days for public comment. After public comments are received and reviewed, the Quality Strategy will be finalized, and copies will be forwarded to CMS Central and Regional Offices. EOHHS will post the most recent version of the Quality Strategy on its website.

In accordance with 42 CFR 438.204(b)(11), Rhode Island has defined what constitutes a "significant change" that would require revision of the Quality Strategy more frequently than every three years. Rhode Island will update its Quality Strategy whenever any of the following significant changes and/or temporal events occur:

- a. a new population group is to be enrolled in Medicaid managed care;
- b. a Medicaid managed care procurement takes place
- c. substantive changes to quality standards or requirements resulting from regulatory authorities or legislation at the state or federal level, or
- d. significant changes in managed care membership demographics or provider network as determined by EOHHS.

### **Section 3.3 Evaluating the Effectiveness of the Quality Strategy**

Rhode Island engages in regular activities to assess the effectiveness of its Medicaid managed care quality strategy including:

- routine monitoring of required MCE reports and data submissions that are due to the state according to a contractually-defined reporting calendar

- collection and analysis of key performance indicators to assess MCE progress toward quality goals and targets at least annually.
- annual review of EQR reports to assess the effectiveness of managed care program in providing quality services in an accessible manner.
- annual strategy review conducted by internal stakeholders for each type of managed care program: acute MCO (including AEs), managed dental, and managed LTSS/Duals.

As MCE, EQR, and other quality reports are reviewed, opportunities may be identified for additional reporting requirements to ensure RI Medicaid is meeting the mission statement assuring access to high quality and cost-effective services that foster the health, safety, and independence of all Rhode Islanders.

Internal and external stakeholders provide input to the development of Rhode Island's Medicaid quality programs, and to the Medicaid Managed Care Quality Strategy itself. Through committees, work groups and opportunities for comment, stakeholders identify areas that merit further discussion to ensure the advancement of person-centered, integrated care and quality outcomes for Medicaid managed care members. For example, in 2019, EOHHS convened a series of stakeholder meetings with the AEs and MCOs to discuss the implementation of the AE Total Cost of Care quality measures, pay-for-performance methodology, and the outcome measures and incentive methodology to ensure measures and methodology met the intended program goals. Similarly, RI Medicaid also convened an MCO and AE workgroup to discuss further refinement of the Social Determinants of Health screening measure.

## Section 4: Assessment of Managed Care

### Section 4.1 State Monitoring of Managed Care Entities

To assess the health care and services furnished by Medicaid MCEs, RI Medicaid has a managed care monitoring system which addresses all aspects of the MCE program consistent with 42 CFR 438.66. For example, the state's oversight and monitoring efforts include assessing performance of each MCE to contract requirements in the following areas:

- administration and management
- appeal and grievance systems
- claims management
- enrollee materials and customer services, including the activities of the beneficiary support system.
- finance, including new medical loss ratio (MLR) reporting requirements,
- Information systems, including encounter data reporting,
- marketing,
- medical management, including utilization management and case management.
- program integrity,
- provider network management, including provider directory standards,
- availability and accessibility of services, including network adequacy standards,
- quality improvement, and
- for MMPs, areas related to the delivery of LTSS not otherwise included above and as applicable to the MMP contract.

RI uses data collected from its monitoring activities to improve the performance of its MCE programs. For example, the state MCE oversight includes reviewing:

- enrollment and disenrollment trends in each MCE and other data submitted by the RI Medicaid enrollment broker related to MCE performance
- member grievance and appeal logs,
- provider complaint and appeal logs,
- findings from RI's EQR process,
- results from enrollee and provider satisfaction surveys conducted by the State/EQRO or MCE,
- MCE performance on required quality measures,
- MCE medical management committee reports and minutes,
- the annual quality improvement plan for each MCE.
- audited financial and encounter data submitted by each MCE,
- the MLR summary reports required by 42 CFR 438.8.
- customer service performance data submitted by each MCE, and
- for the MMP contract, other data related to the provision of LTSS not otherwise included above as applicable to the MMP contract.

## Section 4.2 Specific MCE Oversight Approaches Used by RI Medicaid

Rhode Island Medicaid has detailed procedures and protocols to account for the regular oversight, monitoring, and evaluation of its MCEs in the areas noted above. As part of its managed care program, RI Medicaid employs a variety of mechanisms to assess the quality and appropriateness of care furnished to all MCO and PAHP members including:

1. Contract management - All managed care contracts and contracts with entities participating in capitated payment programs include quality provisions and oversight activities. Contracts include requirements for quality measurement, quality improvement, and reporting. Active Contract Management is a crucial tool in RI Medicaid's oversight. Routine reporting allows RI Medicaid to identify issues, trends and patterns early and efficiently to mitigate any potential concerns. Another key part of its contract management approach are monthly oversight meetings that RI Medicaid directs with each MCE. One topic that may be included in contract oversight meetings, for example, is mental health parity. The state may use this meeting as a forum to address compliance issues or questions related to the updated MCO Contract language related to mental health parity:
  - *The Contractor must comply with MHPAEA requirements and establish coverage parity between mental health/substance abuse benefits and medical/surgical benefits. The Contractor will cover mental health or substance use disorders in a manner that is no more restrictive than the coverage for medical/surgical conditions. The Contractor will publish any processes, strategies, evidentiary standards, or other factors used in applying Non-Qualitative Treatment Limitations (NQTL) to mental health or substance use disorder benefits and ensure that the classifications are comparable to, and are applied no more stringently than, the processes, strategies, evidentiary standards, or other factors used in applying the limitation for medical/surgical benefits in the classification. The Contractor will provide EOHHS with its analysis ensuring parity compliance when: (1) new services are added as an in-plan benefit for members or (2) there are*

*changes to non-qualitative treatments limitations. The Contractor will publish its MHPAEA policy and procedure on its website, including the sources used for documentary evidence. In the event of a suspected parity violation, the Contractor will direct members through its internal complaint, grievance and appeals process as appropriate. If the matter is still not resolved to the member's satisfaction, the member may file an external appeal (medical review) and/or a State Fair Hearing. The Contractor will track and trend parity complaints, grievances and appeals on the EOHHS approved template at a time and frequency as specified in the EOHHS Managed Care Reporting Calendar and Templates.*

2. State-level data collection and monitoring – RI Medicaid collects data to compare MCE performance to quality and access standards in the MCE contracts. At least annually, for example, Rhode Island collects HEDIS and other performance measure data from its managed care plans and compares plan performance to national benchmarks, state program performance, and prior plan performance. In addition, the state monitors MCE encounter data to assess trends in service utilization, as well as analyzing a series of quarterly reports, including informal complaints, grievances, and appeals.

RI Medicaid's enhanced Reporting Calendar tool helps MCOs and the state better track, manage, and assess a comprehensive series of standing reports used for oversight and monitoring of the State's managed care programs. MCO reports are submitted monthly, quarterly and annually depending on the reporting cadence on a variety of topics specified by the state, such as:

- Care Management
- Compliance
- Quality Improvement Projects
- Access, secret shopper, provider panel
- Grievances and Appeals
- Financial Reports
- Informal Complaints
- Pharmacy Home

See **Appendix C** for an abbreviated copy of the MCO Reporting Attestation Form developed by RI Medicaid. The scheduled MCE reports allow RI Medicaid to identify emerging trends, potential barriers or unmet needs, and/or quality of care issues for managed care beneficiaries. The findings from the MCE reports are analyzed by the state and discussed with contracted health plans during monthly MCE Oversight and Monitoring meetings. During this Quality Strategy period, RI Medicaid will expand the enhanced Reporting Calendar tool to apply to the dental PAHP and to the MMP.

In addition, MCEs are required to submit information for financials, operations, and service utilization through the encounter data system. RI Medicaid maintains and operates a data validation plan to assure the accuracy of encounter data submissions.



3. Performance Incentives - Within the contract for Rite Care, Rhody Health Partners and Rhody Health Expansion, the state requires performance measures through a pay-for-performance program called the Performance Goal Program (PGP). MCOs can earn financial incentives for achieving specified benchmarks for measures in the following domains: utilization, access to care, prevention/screening, women's health, and chronic care management, and behavioral health. The contract for the MMP requires performance measures that are tied to withholds. The plan can earn the withhold payment by meeting benchmarks as outlined in the contract. The PAHP has one required performance measure that is calculated using a HEDIS methodology.

To create more meaningful consequences for MCE performance in the future, RI Medicaid will develop and more actively utilize a combination of financial and non-financial incentives for contracted MCEs to meet or exceed performance expectations. To make a stronger business case for MCEs to invest in improved performance on behalf of members, RI Medicaid may amend its MCE policies and contracts to specifically require more transparency on performance and to specify financial penalties on MCEs performing below state-defined minimum benchmarks for certain key measures.

4. Performance improvement projects - Each managed care entity is required to complete at least two performance improvement projects (PIPs) annually in accordance with 42 CFR 438.330(d) and the RI Medicaid managed care contracts. RI Medicaid MCOs are contractually obligated to conduct 4 PIPs annually. The dental plan has two contractually required PIP(s). The MMP is also required to perform one additional PIP specific to that population and their service needs. After analysis and discussion, MCEs are required to act on findings from each contractually required quality improvement project.
5. Annual Quality Plan-Each MCE must submit an annual quality plan to RI Medicaid. This plan must align the RI Medicaid's goals and objectives. RI Medicaid contracts with an EQRO to perform an independent annual review of each Medicaid MCE. The state's EQRO is involved in reviewing the MCE quality plans as part of its broader role in performing the external quality review of each managed care entity and program.
6. Accreditation Compliance Audit- As part of the annual EQR, the EQRO conducts an annual accreditation compliance audit of contracted MCOs. The compliance review is a mandatory EQR activity and offers valuable feedback to the state and the plans. Based on NCQA rankings, RI's Medicaid health plans continue to rank in the top percentiles of Medicaid plans nationally. The state and the EQR reinforces the State's requirement that participating MCOs maintain accreditation by the NCQA. The state reviews and acts on changes in any MCO's accreditation status and has set a performance "floor" to ensure that any denial of accreditation by NCQA is considered cause for termination of the RI Medicaid MCO Contract. In addition, MCO achievement of no greater than a provisional accreditation status by NCQA requires the MCO to submit a Corrective Action Plan within 30 days of the MCO's receipt of its final report from the NCQA.

RI Medicaid conducts monthly internal staff meetings to discuss MCE attainment of performance goals and standards related to access, quality, health outcomes, member services, network capacity, medical management, program integrity, and financial status. Continuous quality improvement is at the core of RI Medicaid's managed care oversight and monitoring activities. The state conducts ongoing analysis of MCE data as it relates to established standards/measures, industry norms, and trends to identify areas of performance improvement and compliance.

When MCE compliance and/or performance is deemed to be below the established benchmark or contractual requirement, RI Medicaid will impose a corrective action, provide technical assistance and will potentially impose financial penalties as necessary.

In addition to the MCE oversight and monitoring mechanisms detailed in this section, RI Medicaid may make modifications or additions to metric development and specification, performance incentives, and data and reporting requirements as necessary, e.g., as part of a contract amendment, a new procurement, or with the implementation of new managed care programs.

The remainder of **Section 4** summarizes components of the RI Medicaid Managed Care Quality Strategy related to oversight of:

- appropriateness of care in managed care (Section 4.3),
- MCE performance levels and targets (Section 4.4) and
- The External Quality Review (Section 4.5).

### **Section 4.3 Appropriateness of Care in Managed Care**

RI Medicaid's oversight of appropriateness of care for Medicaid managed care members includes a variety of state requirements and processes, including early identification and swift treatment, consideration of persons with special health care needs, cultural competency and considerations to measure and address health disparities. This section summarizes key components of the Quality Strategy related to appropriateness of care.

#### **1. EPSDT: Early Periodic Screening, Diagnosis and Treatment (EPSDT)**

Appropriateness of care begins with early identification and swift treatment. As part of its MCE oversight, RI Medicaid monitors provision of Early Periodic Screening, Diagnosis and Treatment (EPSDT) to managed care members. The *State's CMS 416: Annual EPSDT Participation Report* is produced annually. Medicaid beneficiaries under age 21 are entitled to EPSDT services, whether they are enrolled in a managed care plan or receive services in a fee-for-service delivery system. EPSDT is key to ensuring that children and adolescents receive appropriate preventive, dental, mental health, and developmental, and specialty services.

Rhode Island uses findings from the CMS 416 Report as part of its Medicaid Quality Strategy to monitor trends over time, differences across managed care contractors, and to compare RI results to data reported by other states. RI Medicaid will share the 416 report results with the MCEs annually, discuss opportunities for improvement and modifications to existing EPSDT approaches as necessary. For example, the CMS 416 report includes but is not limited to the following measures:

- Screening Ratio
- Participant Ratio
- Total Eligibles Receiving Any Dental Services
- Total Eligibles Receiving Preventive Dental Services
- Total Eligibles Receiving Dental Treatment Services
- Total Eligibles Receiving a Sealant on a Permanent Molar Tooth
- Total Eligibles Receiving Dental Diagnostic Services
- Total Number of Screening Blood Lead Tests

## 2. Persons with Special Health Care Needs

A critical part of providing appropriate care is identify Medicaid beneficiaries with special health care needs as defined in the MCE contracts. Each MCE must have mechanisms in place to assess enrollees identified as having ***special health care needs***. Rhode Island defines children with special health care needs (CSHCN) as: persons up to the age of twenty-one who are blind and/or have a disability and are eligible for Medical Assistance on the basis of SSI; children eligible under Section 1902(e) (3) of the Social Security Administration up to nineteen years of age (“Katie Beckett”); children up to the age of twenty-one receiving subsidized adoption assistance, and children in substitute care or “Foster Care”. The State defines adults with special health care needs as adults twenty-one years of age and older who are categorically eligible for Medicaid, not covered by a third-party insurer such as Medicare, and residing in an institutional facility.

For each enrollee that the managed care program deems to have special health care needs, the MCE must determine ongoing treatment and monitoring needs. In addition, for members including but not limited to enrollees with special health care needs, who are determined through an assessment by appropriate health care professionals to need a course of treatment or regular care monitoring, each MCO must have a mechanism in place to allow such enrollees direct access to a specialist(s) (for example, through a standing referral or an approved number of visits) as appropriate for the enrollee’s condition and identified needs. Access to Specialists is monitored through a monthly report from the managed care entity.

For populations determined to have special healthcare needs, continuity of care and subsequent planning is crucial. As such, Medicaid MCOs are required to continue the out-of-network coverage for new enrollees for a period of up to six months, and to continue to build their provider network while offering the member a provider with comparable or greater expertise in treating the needs associated with that member's medical condition. See **Appendix A** for a copy of RI Medicaid’s currently proposed Transition of Care (TOC) Policy. This TOC policy is being finalized simultaneously with this Quality Strategy.

## 3. Cultural Competency

At the time of enrollment, individuals are asked to report their race and ethnicity and language. These data are captured in an enrollment file and can be linked to MMIS claims data and analyzed. This data is used to ensure the delivery of culturally and linguistically appropriate services to Health Plan members. For example, Health Plans are required to provide member handbook and other pertinent health information and documents in languages other than English, including the identification of providers who speak a language other than English as well as to provide interpreter services either by telephone or in-person to ensure members are able to access covered services and communicate with their providers. In addition, Health Plans are obligated to adhere to the American Disabilities Act and ensure accessible services for members with a visual, hearing, and/or physical disability.

## 4. Health Disparity Analysis

MCOs are required to submit their annual HEDIS submission stratified by Core Rite Care only and for All Populations, including special needs population such as Rhody Health Partners. As part of Rhode Island’s External Quality Review process, analysis is completed to identify differences in rates between the Core Rite Care only group and those including All Populations. (The Health Plans utilize internal quality and analytic tools such as CAHPS which is provided in both English and Spanish as well as informal complaints to identify and monitor for potential health disparities.)

In addition, since 2014, (for CY 2013) the Health Plans have provided the following four HEDIS measures stratified by gender, language, and SSI status:

- *Controlling high blood pressure (CBP)*
- *Cervical cancer screening (CCS)*
- *Comprehensive diabetes care HbA1c Testing (CDC)*
- *Prenatal and Postpartum care: Postpartum care rate (PPC)*

With assistance from the EQRO, the state and MCOs are assessing trends in the disparities shown in these disparity-sensitive national performance measures over time. The state and MCEs are also working to design quality improvement efforts to address social determinants of health and hopefully improve health equity. As part of this Managed Care Quality Strategy, RI Medicaid will support these efforts by:

- working with MCOs and AEs to screen members related to social determinants of health and make referrals based on the screens, and
- developing a statewide workgroup to resolve barriers to data-sharing and increase the sharing and
- aggregating of data across all state Health and Human Service agencies to better address determinants.

#### Section 4.4 MCE Performance Measures and Targets

The development of quality measures and performance targets is an essential part of an effective Medicaid program. RI Medicaid identifies performance measures specific to each managed care program or population served across different types of measurement categories. The State works with its MCEs and its EQRO to collect, analyze, and compare MCE and program performance on different types of measures and measure sets that include both clinical performance measures and member experience measures. The MCE measure sets described in this section and the MCO performance measures in **Appendix B** provide quantifiable performance driven objectives that reflect state priorities and areas of concern for the population covered.

Rhode Island uses HEDIS and CAHPS results as part of its quality incentive programs and to inform its approach to quality management work undertaken with managed care entities. The RI Medicaid staff work collaboratively with MCOs, AEs, the Office of the Health Insurance Commissioner OHIC and other internal and external stakeholders to strategically review and where needed modify, measures and specifications for use in Medicaid managed care quality oversight and incentive programs.

RI Medicaid has employed use of standard measures that are nationally endorsed, by such entities as the National Quality Forum (NQF). Rhode Island collects and voluntarily reports on most CMS Adult and Child Core Measure Set performance measures.<sup>9</sup> In 2019, Rhode Island reported on 20 measures from the Adult Core Set and 17 measures from the Child Core Set, with measurement reflecting services delivered to Medicaid beneficiaries in CY2017. RI Medicaid also opts to report on some CMS Health Home core measures.

Rhode Island uses HEDIS and CAHPS results as part of its quality incentive programs and to inform its approach to quality management work undertaken with managed care entities. For example, the Child and Adult Core Measure Sets inform the measures used in RI Medicaid's MCO Performance Goal Program (PGP). In addition, all applicable PGP measures are benchmarked on a national level using the Quality Compass<sup>®</sup>. Historically, the

<sup>9</sup> <https://www.medicaid.gov/medicaid/quality-of-care/downloads/performance-measurement/2019-child-core-set.pdf> and <https://www.medicaid.gov/medicaid/quality-of-care/downloads/performance-measurement/2019-adult-core-set.pdf>

MCO PGP has provided financial incentives to the health plans for performing in the 90th and 75th national Medicaid percentiles according to Quality Compass rankings.

As RI Medicaid moves forward with new performance measures, specifications and incentive approaches with its AE program, the state also intends to re-visit the MCO performance measures, specifications, and incentives used to support and reward quality improvement and excellence. Similarly, as the state prepares to re-procure its managed dental program, RI Medicaid intends to review the performance measures, expectations, and incentives for future dental plan contractors.

RI Medicaid consults with its EQRO in establishing and assessing CAHPS survey requirements and results for MCEs. All MCEs are required to conduct CAHPS 5.0 member experience surveys and report to RI Medicaid and its EQR on member satisfaction with the plan. RI Medicaid is exploring the use of additional member satisfaction surveys to assess AE performance in the future. For example, Rhode Island will explore the future use of a statewide CAHPS survey to assess consumer satisfaction with members in AEs, such as the potential use of the Clinician Group CG-CAHPS version survey for adults and children receiving primary care services from AEs.

Rhode Island Medicaid has historically relied heavily on HEDIS and NCQA to identify measures and specifications. This has proven to be a crucial component of the success of RI's MCOs as evidenced by their high NCQA rankings. However, recently there have been significant changes in RI's managed care delivery system that may require a more customized approach to at least some managed care performance measures and targets. The catalyst for this shift is inherently connected to the AE program and the future vision of RI Medicaid. With behavioral health benefits carved in and the addition of the AE program, a vast array of managed care services and providers are or will be involved in collecting and reporting on quality data in a new way. RI Medicaid is working to ensure that contracted MCEs, their AE provider partners and behavioral health network providers are equipped to adequately collect and report on quality measures. RI Medicaid has required the MCEs to support provider readiness related to quality. As part of its managed care quality strategy, RI Medicaid will continue to monitor MCE, AE, and provider progress via a variety of oversight and reporting activities.

RI Medicaid has obtained technical assistance from experts in quality to support state efforts and ensure RI Medicaid has a mechanism to track and achieve its goals. RI Medicaid now has some additional capacity to develop measures, collect data, analyze findings and enforce accountability (penalties/incentives). Over the next three years, RI Medicaid will look to include state custom measures into managed care oversight activities. The states modifications to its managed care performance measures and specifications over time will be designed to ensure that the MCE and AE programs are capturing accurate data to reflect activities related to the state's unique approaches to achieving its quality goals.

Rhode Island Medicaid works to ensure that its performance measures tie back to the agency's goals, objectives, and mission. Measures are chosen that align with the State's commercial partners which lessens provider burden and streamlines expectations. Clinical and non-clinical measures that represent key areas of interest are chosen accordingly. Many MCO performance measures belong to the CMS Adult and Child Core Measure Sets and the measurement domains for AEs are closely aligned with the MCO measures.

To assess MCE performance and establish targets across areas of member experience, clinical performance and monitoring measures, MCE rates are compared to appropriate regional, national, or state benchmarks as available and applicable. As is currently the practice at RI Medicaid, many of these performance benchmarks will be obtained from the NCQA's Medicaid Quality Compass, from performance comparison across MCEs and, when feasible, from

the state's OHIC or its all-payer claims database. Where external benchmarks are not available, EOHHS will use baseline performance and targets established through initial or historical performance (e.g., for new or emerging measures).

Alongside efforts to create new AE performance benchmarks, targets, and quality incentives to support its delivery system reform efforts, during 2019, RI Medicaid will re-examine its MCE performance benchmarks, targets, and consider modifications to financial and non-financial MCO performance incentives. EOHHS shall also consider refinements to the measures used in the Total Cost of Care Program and Medicaid Infrastructure Incentive Program for AEs.

## Section 4.5 External Quality Review

As required by 42 CFR 438.350, an annual External Quality Review (EQR) of Rhode Island's Medicaid managed care program must be conducted by an independent contractor and submitted to the CMS annually. IPRO is under contract with RI Medicaid to conduct the EQR function for the State. Rhode Island's current Medicaid managed care EQR contract with IPRO runs from January 2019 through January 2020. The contract period for this effort begins on January 1, 2019 through December 31, 2021, with the potential for up to three one-year extensions.

In accordance with 42 CFR Part 438, subpart E, the EQRO performs, at minimum, the mandatory activities of the annual EQR. RI Medicaid may ask the EQRO to perform optional activities for the annual EQR. The EQRO provide technical guidance to MCOs/PAHP on the mandatory and optional activities that provide information for the EQR. These activities will be conducted using protocols or methods consistent with the protocols established by the Secretary in accordance with 42 CFR 438.352 Activities- the EQRO must perform the following activities for each MCO/PAHP:

1. **Performance Improvement Projects** - Validation of PIPs required in accordance with 42 CFR 438.330(b)(1) that were underway during the preceding 12 months. Currently, MCOs are required to complete at least four PIPs each year. Additionally, the contract for the MMP requires at least one more PIP. The PAHP is required to complete at least two performance improvement projects each year.
2. **Performance Goal Program** - Validation of MCO and PAHP performance measures required in accordance with 42 CFR 438.330(b)(2) or MCO/PAHP performance measures calculated by the state during the preceding 12 months.
3. **Access** -Validation of MCO and PAHP network adequacy during the preceding 12 months to comply with requirements set forth in 42 CFR 438.68 and 438.14(b)(1) and state standards established in the respective MCE contracts as summarized in **Section 5**. Validation of network adequacy will include, but not be limited to a secret shopper survey of MCO and dental PAHP provider appointment availability in accordance with contractual requirements established by the state.
4. **Accreditation Compliance Review** - A review, conducted within the previous three-year period, to determine each MCO's and PAHP's compliance with the standards set forth in 42 CFR Part 438, subpart D and the quality assessment and performance improvement requirements described in 42 CFR 438.330. Within the contracts for Rite Care, Rhody Health Partners Rhody Health Expansion, Rhody Health Options, and Medicare Medicaid Plan the state requires the MCOs to be accredited by the National Committee for Quality Assurance as a Medicaid Managed Care organization. The PAHP is accredited by the Utilization Review Accreditation Commission (URAC).
5. **Special enhancement activities** as needed. In addition, the State reserves the option to direct the EQRO to conduct additional tasks to support the overall scope of this EQR work in order to have flexibility to bring

on additional technical assistance and expertise in a timely manner to perform activities which require similar expertise and work functions as those described in 1 to 4 above. One example of this may be the EQRO's future assistance in conducting a CAHPs satisfaction survey for Medicaid members attributed to an AE.

6. The EQRO is responsible for the analysis and evaluation of aggregated information on quality outcomes, timeliness of, and access to the services that a managed care entity or its contractors furnish to Medicaid enrollees. The EQRO produces an annual detailed technical report that summarizes the EQR findings on access and quality of care for MCEs including:
  - A description of the way data from all activities conducted were aggregated and analyzed, and conclusions were drawn as to the quality, timeliness, and access to care furnished by the MCEs.
  - For each Mandatory and, if directed by the State, Optional Activity conducted the objectives, technical methods of data collection and analysis, description of data obtained (including validated performance measurement data for each activity conducted), and conclusions drawn from the data.
  - An assessment of each MCE's strengths and weaknesses for the quality, timeliness, and access to health care services furnished to Medicaid beneficiaries.
  - Recommendations for improving the quality of health care services furnished by each MCE including how the State can establish target goals and objective in the quality strategy to better support improvement in the quality, timeliness, and access to health care services furnished to Medicaid beneficiaries.
  - An assessment of the degree to which each MCE has addressed effectively the recommendations for quality improvement made by the EQRO during the previous year's EQR.
  - An evaluation of the effectiveness of the State's quality strategy and recommendations for updates
  - based on the results of the EQR.

Concurrently, each MCE is presented with the EQRO's report, in conjunction with the State's annual continuous quality improvement cycle, as well as correspondence prepared by RI Medicaid which summarizes the key findings and recommendations from the EQRO. Subsequently, each MCO must make a presentation outlining the MCO's response to the feedback and recommendations made by the EQRO to the State formally.

The EQRO presents clear and concrete conclusions and recommendations to assist each MCO, PAHP, and RI Medicaid in formulating and prioritizing interventions to improve performance and to consider when updating the State's managed care quality strategy and other planning documents. A recent EQR can be found here: <http://www.eohhs.ri.gov/Portals/0/Uploads/Documents/Reports/2016AggregateEQRTechnicalReport.pdf>

Each MCO and PAHP is required to respond the EQRO's recommendations and to state any improvement strategies that were implemented. The MCO and PAHP responses to previous recommendations are included in the report. Recommendations for improvement that are repeated from the prior year's report are closely monitored by the EQRO and RI Medicaid. The EQRO produces a technical report for each MCO and PAHP and one aggregate report for RI Medicaid. The aggregate report includes methodologically appropriate comparative information about all MCEs. The EQRO reviews the technical reports with the State and MCEs prior to the State's submission to CMS and posting to the State's website; however, the State or MCEs may not substantively revise the content of the final EQR technical report without evidence of error or omission.

In conjunction with the State's annual continuous quality improvement cycle, findings from the annual EQR reports are presented to RI Medicaid's Quality Improvement Committee for discussion by the State's team which oversees the MCEs. The information provided as a result of the EQR process informs the dialogue between the EQRO and the State. Rhode Island incorporates recommendations from the EQRO into the State's oversight and administration of Rite Care, Rhody Health Partners, Rite Smiles and the Medicare-Medicaid Dual Demonstration program.

## Section 5: State Standards

### Section 5.1 RI Managed Care Standards

Rhode Island's Medicaid managed care contracts have been reviewed by CMS for compliance with the Medicaid managed care rule and the 2017 version of the *"State Guide to CMS Criteria for Medicaid Managed Care Contract Review and Approval."*<sup>10</sup> The State is concurrently amending its dental plan contract to clarify the contractor's requirement to specifically comply with all applicable PAHP requirements in 42 CFR 438 per CMS feedback. RI Medicaid is also preparing to make additional changes to its managed dental program when it re-procures its dental contract prior to July 2020. The state seeks to contract with two qualified, statewide Medicaid dental plans by mid-2020.

All RI Medicaid MCEs are required to maintain standards for access to care including availability of services, care coordination and continuity of care, and coverage and authorization of services required by 42 CFR 438.68 and 42 CFR 438.206-438.210.

For example, in accordance with the standards in 42 CFR 438.206 RI Medicaid ensures that services covered under MCE contracts are accessible and available to enrollees in a timely manner. Each plan must maintain and monitor a network of appropriate providers that is supported by written agreements and sufficient to provide adequate access to all services covered under the MCE contract. The RI Medicaid MCE contracts require plans to monitor access and availability standards of the provider network to determine compliance with state standards and take corrective action if there is a failure to comply by a network provider(s).

### Section 5.2 MCO Standards

In the contracts for Rite Care, Rhody Health and Partners Rhody Health Expansion the state has specified time and distance standards for adult and pediatric primary care, obstetrics and gynecology, adult and pediatric behavioral health (mental health and substance use disorder), adult and pediatric specialists, hospitals, and pharmacies.

<sup>10</sup> <https://www.medicaid.gov/medicaid/managed-care/downloads/mce-checklist-state-user-guide.pdf>



**Table 4** below includes time and distance standards for contracted Medicaid MCOs:

<b>TABLE 4: MCO ACCESS TO CARE STANDARDS</b>	
<b>Provider Type</b>	<b>Time and Distance Standard Provider office is located within the lesser of</b>
Primary care, adult and pediatric	Twenty (20) minutes or twenty (20) miles from the member's home.
OB/GYN specialty care	Forty-five (45) minutes or thirty (30) miles from the member's home
Outpatient behavioral health-mental health	
Prescribers-adult	Thirty (30) minutes or thirty (30) miles from the member's home.
Prescribers-pediatric	Forty-five (45) minutes or forty-five (45) miles from the member's home.
Non-prescribers-adult	Twenty (20) minutes or twenty (20) miles from the member's home.
Non-prescribers-pediatric	Twenty (20) minutes or twenty (20) miles from the member's home.
Outpatient behavioral health-substance use	
Prescribers	Thirty (30) minutes or thirty (30) miles from the member's home.
Non-prescribers	Twenty (20) minutes or twenty (20) miles from the member's home.
Specialist	
The Contractor to identify top five adult specialties by volume	Thirty (30) minutes or thirty (30) miles from the member's home.
The Contractor to identify top five pediatric specialties by volume	Forty-five (45) minutes or forty-five (45) miles from the member's home.
Hospital	Forty-five (45) minutes or thirty (30) miles from the member's home
Pharmacy	Ten (10) minutes or ten (10) miles from the member's home
Imaging	Forty-five (45) minutes or thirty (30) miles from the member's home
Ambulatory Surgery Centers	Forty-five (45) minutes or thirty (30) miles from the member's home
Dialysis	Thirty (30) minutes or thirty (30) miles from the member's home.

The RI Medicaid MCO contract, (Section 2.09.04 Appointment Availability) also includes the following state standards. The contracted MCOs agree to make services available to Medicaid members as set forth below:

<b>Table 5: MCO Timeliness of Care Standards</b>	
<b>Appointment</b>	<b>Access Standard</b>
After Hours Care Telephone	24 hours 7 days a week
Emergency Care	Immediately or referred to an emergency facility
Urgent Care Appointment	Within 24 hours
Routine Care Appointment	Within 30 calendar days
Physical Exam	180 calendar days
EPSDT Appointment	Within 6 weeks
New member Appointment	30 calendar days
Non-Emergent or Non-Urgent Mental Health or Substance Use Services	Within 10 calendar days

Among other federal and state requirements, MCE contract provisions related to availability of services require RI Medicaid MCEs to:

- offer an appropriate range of preventive, primary care, and specialty services,
- maintain network sufficient in number, mix, and geographic distribution to meet the needs of enrollees,
- require that network providers offer hours of operation that are no less than the hours of operation offered to commercial patients or comparable to Medicaid fee-for-service patients if the provider does not see commercial patients,
- ensure female enrollees have direct access to a women's health specialist,
- provide for a second opinion from a qualified health care professional,
- adequately and timely cover services not available in network,
- provide the state and CMS with assurances of adequate capacity and services as well as assurances and documentation of capacity to serve expected enrollment,
- have evidence-based clinical practice guidelines in accordance with 42 CFR §438.236, and
- comply with requests for data from the EOHHS' EQRO.

### Section 5.3 MMP Standards

In the contracts for Rhody Health Options and Medicare Medicaid Plan the state has specified time and distance standards for long-term services and supports.

MMP standards are included in the RI Medicaid MCO contract with Neighborhood and are specific to members who are dually eligible for Medicare and Medicaid and enrolled in this managed care plan. Network requirements, including network adequacy and availability of services under the State's MMP contract are similar to those for managed medical and behavioral health care but also take into account Medicare managed care standards and related federal requirements for plans serving dual-eligibles. Although methods and tools may vary, each long-term service and supports (LTSS) delivery model is expected to ensure that, for example:

- an individual residing in the community who has a level of care of "high" or "highest" will have, at a minimum, a comprehensive annual assessment,
- an individual residing in the community who has a level of care of "high" or "highest" will have, at a minimum, an annual person-centered care/service plan,
- Covered services provided to the individual is based on the assessment and service plan,

- providers maintain required licensure and certification standards,
- training is provided in accordance with state requirements,
- a critical incident management system is instituted to ensure critical incidents are investigated and substantiated and recommendations to protect health and welfare are acted upon, and
- providers will provide monitoring, oversight and face-to-face visitation per program standards.

## Section 5.4 Dental PAHP Standards

In the Medicaid managed dental contract, Rhode Island has specified time and distance standards for pediatric dental. RI Medicaid network adequacy and availability of service requirements under the State's managed dental care contract are broadly similar to those for managed medical and care but focused on covered dental services for Medicaid enrollees under age 21. The Dental Plan is contractually required to establish and maintain a geographically accessible statewide network of general and specialty dentists in numbers sufficient to meet specified accessibility standards for its membership. The Dental Plan is also required to contract with all FQHCs providing dental services, as well as with both hospital dental clinics in Rhode Island, and State-approved mobile dental providers.

For example, the Dental PAHP is required to make available dental services for Rite Smiles members within forty-eight (48) hours for urgent dental conditions. The Dental Plan also is required to make available to every member a dental provider, whose office is located within twenty (20) minutes or less driving distance from the member's home. Members may, at their discretion, select a dental provider located farther from their homes. The Dental plan is required to make services available within forty-eight (48) hours for treatment of an Urgent Dental Conditions and to make services available within sixty (60) days for treatment of a non-emergent, non-urgent dental problem, including preventive dental care. The Dental Plan is also required to make dental services available to new members within sixty (60) days of enrollment.

## Section 6: Improvement and Interventions

### Section 6.1 Improvement and Interventions

Improvement strategies described throughout this RI Medicaid Quality Strategy document are designed to advance the quality of care delivered by MCEs through ongoing measurement and intervention. To ensure that incentive measures, changes to the delivery system, and related activities result in improvement related the vision and mission, RI Medicaid engages in multiple interventions. These interventions are based on the results of its MCE assessment activities and focus on the managed care goals and objectives described in **Section 2**.

RI Medicaid's ongoing and expanded interventions for managed care quality and performance improvement include:

1. Ongoing requirements for MCEs to be nationally accredited

RI Medicaid MCOs will continue to be required to obtain and maintain NCQA accreditation and to promptly share its accreditation review results and notify the state of any changes in its accreditation status. As NCQA increases and modifies its Medicaid health plan requirements over time based on best practices nationally, the standards for RI Medicaid plans are also updated. Loss of NCQA accreditation, or a change to provisional accreditation status will continue to trigger a corrective action plan requirement for RI Medicaid plans and may result in the state terminating an MCO contract. As previously noted, the dental PAHP is accredited by URAC which similarly offers

ongoing and updated dental plan utilization review requirements over time. In addition, RI Medicaid uses its EQRO to conduct accreditation reviews of its MCE plans.

During its upcoming re-procurement of the managed dental contract, RI Medicaid will explore modifications to its existing plan accreditation requirements, as well as modifications to contract language related to consequences for loss of sufficient accreditation for its dental plans.

## 2. Tracking participation in APMs related to value-based purchasing (pay for value not volume)

Medicaid MCOs will be required to submit reports on a quarterly basis that demonstrate their performance in moving towards value-based payment models, including:

- a. Alternate Payment Methodology (APM) Data Report
- b. Value Based Payment Report and
- c. Accountable Entity-specific reports.

RI Medicaid will review these reports internally and with contracted MCEs and AEs to determine how the progress to date aligns with the goals and objectives identified in this Medicaid managed care Quality Strategy. This APM data and analysis will also inform future state, MCE, AE and work group interventions and quality improvement efforts.

## 3. Pay for Performance Incentives for MCEs and AEs

As noted in the Managed Care Quality Strategy Objectives in **Section 2**, RI Medicaid intends create non-financial incentives such as increasing transparency of MCE performance through public reporting of quality metrics & outcomes – both online & in person.

In addition, as part of this Quality Strategy, RI Medicaid will review and potentially modify financial incentives (rewards and/or penalties) for MCO performance to benchmarks and improvements over time. RI Medicaid will also consider modifications to AE measures and incentives over time based on results of its MCO and AE assessments and its managed care goals and objectives.

Finally, as part of its upcoming managed dental procurement, RI Medicaid intends to both strengthen its model contract requirements related to dental performance, transparency of performance, and consider the use of new or modified financial and/or non-financial performance incentives for its managed dental plans in the future.

## 4. Statewide collaboratives and workgroups that focus on quality of care

RI Medicaid will continue to work with MCEs and the EQRO to collect, analyze, compare and share quality and other performance data across plans and programs to support ongoing accountability and performance improvement. EOHHS convenes various collaborative workgroups to ensure stakeholders have opportunities to advise, share best practices, and contribute to the development of improvement projects and program services. Examples of these workgroups include:

- Accountable Entity Advisory Committee
- Behavioral Health Workgroup for Children
- Behavioral Health Workgroup for Adults
- 1115 waiver Demonstration Quality Workgroup
- Integrated Care Initiative Implementation Council

- Governor's Overdose Taskforce
- Long-term Care Coordinated Council

During the period of this Quality Strategy, RI Medicaid will consider how the work of these groups can better align with and support the goals and objectives identified in this Medicaid managed care Quality Strategy. In addition, as noted in **Section 2**, the State will develop a chronic disease management workgroup and include state partners, MCEs and AEs, to promote more effective management of chronic disease, including behavioral health and co-morbid conditions.

5. Soliciting member feedback through a variety of forums and mechanisms: empowering members in their care

As previously noted, MCEs and the EQRO are involved in administering and assessing performance and satisfaction surveys sent to Medicaid managed care participants and/or their representatives. RI Medicaid will require, compare, and share member experience data to support ongoing managed care accountability and performance improvement. In addition, as part of its managed care objectives, RI Medicaid will explore future use of a statewide survey to assess member satisfaction related to AEs, such as the Clinician Group (CG-CAHPS) survey for adults and children receiving primary care services from AEs. RI Medicaid is also considering the use of managed care focus groups to better identify improvement opportunities and develop measures and strategies to ensure better outcomes that matter to members.

## Section 6.2 Intermediate Sanctions

Rhode Island's Medicaid MCO Contracts clearly define intermediate sanctions, as specified in CFR 438.702 and 438.704, which EOHHS will impose if it makes any of the following determinations or findings against an MCO from onsite surveys, enrollee or other complaints, financial status or any other source:

1. EOHHS determines that a Medicaid MCO acts or fails to act as follows:
  - a. Fails substantially to provide medically necessary services that it is required to provide, under law or under its contract with the State, to an enrollee covered under the contract; EOHHS may impose a civil monetary penalty of up to \$25,000 for each instance of discrimination.
  - b. Imposes on Members premiums or charges that are in excess of the premiums or charges permitted under the Medicaid program; the maximum amount of the penalty is \$25,000 or double the amount of the excess charges, whichever is greater.
  - c. Acts to discriminate among enrollees on the basis of their health status or need for health care services; the limit is \$15,000 for each Member EOHHS determines was not enrolled because of a discriminatory practice, subject to an overall limit of \$100,000.
  - d. Misrepresents or falsifies information that it furnishes to CMS or to EOHHS; EOHHS may impose a civil monetary penalty of up to \$100,000 for each instance of misrepresentation.
  - e. Misrepresents or falsifies information that it furnishes to a Member, potential Member, or health care provider; EOHHS may impose a civil monetary penalty of up to \$25,000 for each instance of misrepresentation.
  - f. Fails to comply with the requirements for physician incentive plans, as set forth (for Medicare) in CFR 422.208 and 422.210 EOHHS may impose a civil monetary penalty of up to \$25,000 for each failure to comply.
  - g. EOHHS determines whether the Contractor has distributed directly or indirectly through any agent or independent contractor, marketing materials that have not been approved by EOHHS or that contain

false or materially misleading information. EOHHS may impose a civil monetary penalty of up to \$25,000 for each failure to comply.

- h. EOHHS determines whether Contractor has violated any of the other applicable requirements of sections 1903(m) or 1932 of the Act, and any implementing regulations.

In addition to any civil monetary penalty levied against a Medicaid MCE as an intermediate sanction, EOHHS may also: a) appoint temporary management to the Contractor; b) grant members the right to disenroll without cause; c) suspend all new enrollment to the Contractor; and/or d) suspend payment for new enrollments to the Contractor. As required in 42 CFR 438.710, EOHHS will give a Medicaid MCE written notice thirty (30) days prior to imposing any intermediate sanction. The notice will include the basis for the sanction and any available appeals rights.

### **Section 6.3 Health Information Technology**

Rhode Island's All Payer Claims Database (APCD) was initiated in 2008. Rhode Island's APCD is an interagency initiative to develop and maintain a central repository of membership, medical, behavioral health and pharmacy claims from all commercial insurers, the self-insured, Medicare, and Medicaid. The purpose of APCD is to build a robust database that helps identify areas for improvement, growth, and success across Rhode Island's health care system. The production of actionable data and reports that are complete, accessible, trusted, and relevant allow for meaningful comparison and help inform decisions made by consumers, payers, providers, researchers, and state agencies. As a co-convenor of APCD, EOHHS was one of the drivers of the project, and continues to be actively involved in its implementation. EOHHS has access to, and the ability to analyze APCD data including Medicaid and Medicare data in the APCD via a business intelligence tool supported by the APCD analytic Vendor. APCD data will be able to be used to report quality measures derived from claims data across the various Medicaid delivery systems.

Rhode Island seeks to expand its' Health Information Technology systems to streamline and automate the quality reporting process to inform policy level interventions and data-driven decision making. State-level Health and Human Service agencies have partnered to share information and collaborate towards achieving positive health outcomes and reducing disparities. This has culminated with the development of an eco-system that collects data from each HHS agency that can be shared within each agency. The ecosystem is still in its infancy but is expected to be a promising tool used in quality reporting and active contract management.

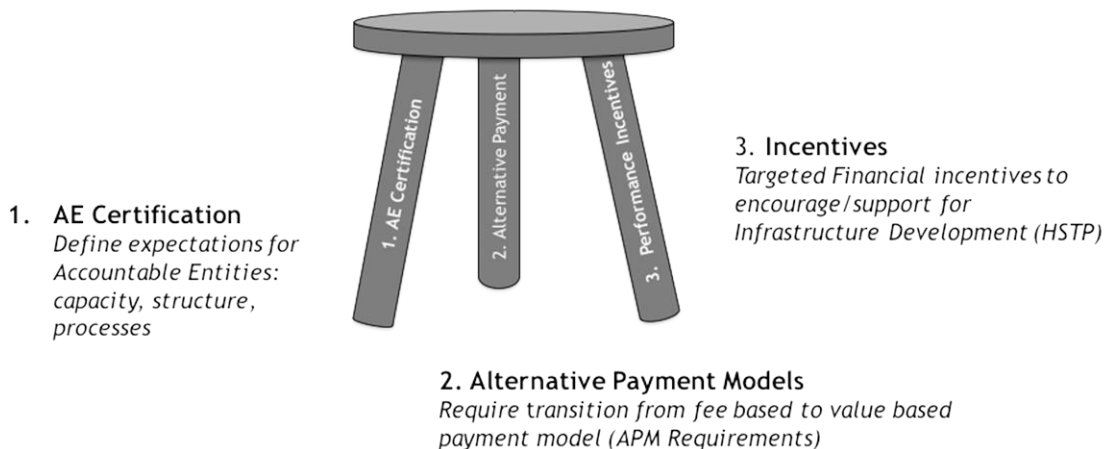
The Rhode Island Department of Health (DOH) also provides oversight functions related to the State's HIT/EHR initiatives with strategies, policies, and clinical guidelines established at the state government level. The Department of Health manages several key HIT initiatives to support data-focused public health and the EHR Incentive Program. These include:

- KIDSNET Childhood Immunization Registry
- Syndromic Surveillance Registry
- Electronic Lab Reporting
- Prescription Drug Monitoring Program (PDMP)

## Section 7: Delivery System Reform

AEs represent interdisciplinary partnerships between providers with strong foundations in primary care that also work to address services outside of the traditional medical model, including but not limited to, behavioral health and social support services. The percentage of members attributed to AEs continues to grow in accordance with EOHHS effort to pay for value not volume.

### Accountable Entity Program Approach: Three “Pillars”



In late 2015, RI Medicaid provisionally certified Pilot AEs and in late 2017, CMS approved the state’s AE Roadmap outlining the State’s AE Program, Alternative Payment Methodologies (APMs) and the Medicaid Infrastructure Incentive Program (MIIP). The MIIP consists of three core programs: (1) Comprehensive AE Program; (2) Specialized LTSS AE Pilot Program; and (3) Specialized Pre-eligibles AE Pilot Program.

EOHHS certifies Accountable Entities which are then eligible to enter into EOHHS-approved alternative payment model contractual arrangements with the Medicaid MCOs. To date, six Comprehensive Accountable Entities have been certified, and qualified APM contracts are in place between five AEs and Medicaid MCOs. The percentage of members attributed to AEs continues to grow in accordance with EOHHS effort to pay for value not volume.

To secure full funding, AEs must earn payments by meeting metrics defined by EOHHS and its MCO partners and approved by CMS. Actual incentive payment amounts to AEs will be based on demonstrated AE performance.

Shared priorities are being developed through a joint MCO/AE working group that includes clinical leadership from both the MCOs and the AEs using a data driven approach. RI Medicaid is actively engaged in this process for identifying performance metrics and targets with the MCOs and the AEs.

Below is the initial list of AE performance measures as developed by RI Medicaid. The state identified these AE performance metrics after examining the Medicaid MCO measures, Adult and Child Core Measure Sets, and the OHIC standardized measures for commercial insurers developed as part of Healthy RI. The state’s quality strategy for AEs, as with MCEs, continues to include alignment with other payers in the market and regionally to reduce

confusion and administrative burden at the provider level where possible, while continuing to focus efforts on performance improvement.

Initial AE Performance Measures	Steward
Breast Cancer Screening	NCQA
Weight Assessment & Counseling for Physical Activity, Nutrition for Children and Adolescents	NCQA
Developmental Screening in the 1st Three Years of Life	OHSU
Adult BMI Assessment	NCQA
Tobacco Use: Screening and Cessation Intervention	AMA-PCPI
Comp. Diabetes Care: HbA1c Control (<8.0%)	NCQA
Controlling High Blood Pressure	NCQA
Follow-up after Hospitalization for Mental Illness (7 days & 30 days)	NCQA
Screening for Clinical Depression & Follow-up Plan	CMS
Social Determinants of Health (SDOH) Screen	RI EOHHS

As part of its ongoing quality strategy for MCOs and AEs, RI Medicaid will examine these AE performance metrics annually to determine if and when certain measures will be cycled out, perhaps because performance in some areas have topped out in Rhode Island and there are other opportunities for improvement on which the state wants MCOs and AEs to focus. For example, for AE performance year three, RI Medicaid is removing Adult BMI Assessment from the measure slate and moving the tobacco use measure to “reporting only.” For the same time period, RI Medicaid will add two new AE HEDIS measures: Adolescent Well Care Visits and Comprehensive Diabetes Care: Eye Exam.

## Section 8: Conclusions and Opportunities

Rhode Island is committed to ongoing development, implementation, monitoring and evaluation of a vigorous quality management program that will effectively and efficiently improve and monitor quality of care for its Medicaid managed care members. Our goals include improving the health outcomes of the state’s diverse Medicaid and CHIP population by providing access to integrated health care services that promote health, well- being, independence and quality of life.

We are excited by the progress in our AE program and the collaboration between RI Medicaid our contracted MCOs and the state-certified AEs. Today, close to 150,000 RI Medicaid MCO members are attributed to an AE. Consistent with our overall managed care approach, RI Medicaid is developing and refining an AE performance measure set and detailed measure specifications to assess AE performance over time as part of a joint workgroup with the state, the MCOs and their contracted AEs.

While strides have been made in Medicaid managed care accountability and value-based purchasing, Rhode Island continues to work towards a focus on accountability for health outcomes inclusive of population health and social determinants. Rhode Island is on the forefront of a shift from a fee for service model to a value-based payment system; this paradigm shift requires collaboration across delivery systems and stakeholders. There is also limited capacity within Medicaid managed care to address broader social needs, which often overshadow and exacerbate members’ medical needs – e.g., housing/housing security, food security, domestic violence/sexual violence. These



issues are particularly problematic when serving the most complex Medicaid populations. In the future, RI Medicaid anticipates taking lessons learned from its AE initiative and its care management initiatives as part of its efforts to improve cost-effective, quality care for the most complex Medicaid populations, including those with long-term care needs.