



**Calendar Year 2025
Performance Improvement Project
(PIP) Validation Report**

***Improving the Cervical Cancer Screening
Rate (21-64 Years of Age)***

for AmeriHealth Caritas Louisiana

April 2026



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1. Background

Title 42 of the Code of Federal Regulations (42 CFR), specifically 42 CFR §438.350, requires states that contract with managed care entities (MCEs)¹ to conduct an external quality review (EQR) of each contracting MCE. An EQR includes analysis and evaluation by an external quality review organization (EQRO) of aggregated information on healthcare quality, timeliness, and access. Health Services Advisory Group, Inc. (HSAG) serves as the EQRO for the State of Louisiana, Department of Health (LDH)—responsible for the overall administration and monitoring of the Louisiana Medicaid managed care program.

In its performance improvement project (PIP) evaluation and validation, HSAG used the Department of Health and Human Services, Centers for Medicare & Medicaid Services (CMS) publication, *Protocol 1. Validation of Performance Improvement Projects: A Mandatory EQR-Related Activity*, February 2023 (CMS EQR Protocol 1).² HSAG’s evaluation of the PIP includes two key components of the quality improvement (QI) process:

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

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

¹ Throughout this report, “MCE” is used when collectively referring to managed care organizations (MCOs), behavioral health prepaid inpatient health plans (PIHPs), and dental prepaid ambulatory health plans (PAHPs); otherwise, the term “MCO,” “PIHP,” or “PAHP” is used.

² Department of Health and Human Services, Centers for Medicare & Medicaid Services. *Protocol 1. Validation of Performance Improvement Projects: A Mandatory EQR-Related Activity*, February 2023. Available at: <https://www.medicaid.gov/medicaid/quality-of-care/downloads/2023-eqr-protocols.pdf>. Accessed on: March 1, 2026.



Rationale

The purpose of a PIP is to achieve, through ongoing measurements and interventions, significant improvement sustained over time in clinical and nonclinical areas.

For calendar year (CY) 2025 validation, ACLA initiated its clinical PIP topic: *Improving the Cervical Cancer Screening Rate (21-64 Years of Age)*. The topic addressed CMS’ requirements related to quality outcomes—specifically, the quality, timeliness, and accessibility of care and services.



Validation Overview and Methodology

For CY 2025, LDH required the MCEs to conduct PIPs in accordance with 42 CFR §438.330(b)(1) and §438.330(d)(2)(i–iv). In accordance with §438.330(d)(2)(i–iv), each PIP must include:



Measuring performance using objective quality indicators



Implementing system interventions to achieve improvement in quality



Evaluating effectiveness of the interventions



Planning and initiating of activities for increasing or sustaining improvement

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

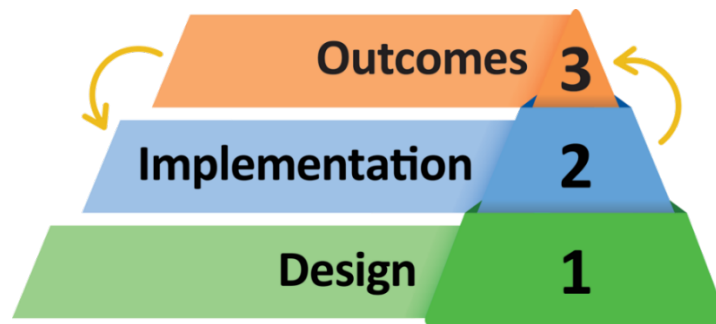
Table 1-1—CMS EQR Protocol Steps

Protocol Steps	
Step Number	Description
1	Review the Selected PIP Topic
2	Review the PIP Aim Statement
3	Review the Identified PIP Population
4	Review the Sampling Method
5	Review the Selected Performance Indicator(s)
6	Review the Data Collection Procedures

Protocol Steps	
Step Number	Description
7	Review the Data Analysis and Interpretation of PIP Results
8	Assess the Improvement Strategies
9	Assess the Likelihood That Significant and Sustained Improvement Occurred

Figure 1-1 illustrates the three stages of the PIP process—Design, Implementation, and Outcomes. Each sequential stage provides the foundation for the next stage. The Design stage (Steps 1–6) establishes the methodological framework for the PIP. The steps in this stage include development of the PIP topic, Aim statement, population, sampling methods, performance indicators, and data collection. To implement successful improvement strategies, a methodologically sound PIP design is necessary.

Figure 1-1—Stages of the PIP Process



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

HSAG obtains the information and data needed to conduct the PIP validation from ACLA’s PIP Submission Form. This form provides detailed information about ACLA’s PIP related to the steps completed and evaluated by HSAG for the CY 2025 validation cycle.³

³ By submitting data, records, documents, and information to HSAG as required by LDH and in support of this EQR activity, the MCE attests, based on best knowledge, information, and belief as to the accuracy, completeness, and truthfulness of the documents and data it submits to HSAG.

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

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

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

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

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

- *High Confidence*: All performance indicators demonstrated *statistically significant* improvement over the baseline.
- *Moderate Confidence*: One of the three scenarios below occurred:
 - All performance indicators demonstrated improvement over the baseline, **and** some but not all performance indicators demonstrated *statistically significant* improvement over the baseline.
 - All performance indicators demonstrated improvement over the baseline, **and** none of the performance indicators demonstrated *statistically significant* improvement over the baseline.
 - Some but not all performance indicators demonstrated improvement over baseline, **and** some but not all performance indicators demonstrated *statistically significant* improvement over baseline.
- *Low Confidence*: The remeasurement methodology was not the same as the baseline methodology for at least one performance indicator **or** some but not all performance indicators

demonstrated improvement over the baseline and none of the performance indicators demonstrated *statistically significant* improvement over the baseline.

- *No Confidence*: The remeasurement methodology was not the same as the baseline methodology for all performance indicators **or** none of the performance indicators demonstrated improvement over the baseline.

2. Findings: PIP Validation Tool

The following contains the final PIP Validation Tool for ACLA.

Section 2. Findings: 2025 PIP Validation Tool
Improving Cervical Cancer Screening Rates
for AmeriHealth Caritas Louisiana

Demographic Information			
MCO Name:	AmeriHealth Caritas Louisiana		
Project Leader Name:	Allison Ladner	Title:	Quality Performance Specialist
Telephone Number:	228-297-2973	Email Address:	aladner@amerihealthcaritasla.com
PIP Title:	<i>Improving Cervical Cancer Screening Rates Among Healthy Louisiana Enrollees 21-64 Years of Age</i>		
Submission Date:	January 30, 2026		
Resubmission Date:	March 13, 2026		

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

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

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

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

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

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

Section 2. Findings: 2025 PIP Validation Tool
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Results for Step 1 - 6			
Total Evaluation Elements	14	8	Critical Elements
<i>Met</i>	7	5	<i>Met</i>
<i>Partially Met</i>	0	0	<i>Partially Met</i>
<i>Not Met</i>	0	0	<i>Not Met</i>
<i>N/A (Not Applicable)</i>	7	3	<i>N/A (Not Applicable)</i>

Evaluation Elements	Critical	Scoring	Comments/Recommendations
Performance Improvement Project Validation			
Step 7. Review Data Analysis and Interpretation of Results: Clearly present the results for each indicator. Describe the data analysis performed, the results of the statistical analysis, and a narrative interpretation for each indicator. Through data analysis and interpretation, real improvement, as well as sustained improvement, can be determined. The data analysis and interpretation of the indicator outcomes:			
1. Included accurate, clear, consistent, and easily understood information in the data table.	C*	Met	
2. Included a narrative interpretation of results that addressed all requirements.		Met	
3. Addressed factors that threatened the validity of the data reported and ability to compare the initial measurement with the remeasurement.		Met	<p>The MCO documented factors that may impact validity and comparability within the narrative description. The MCO stated the CCS measure became administrative in 2025; however, in prior annual submissions the MCO documented that administrative data was used for both the baseline and Remeasurement 1. The MCO must clearly describe the change that occurred in 2025 and if there were any changes to the data collection method in the second remeasurement period.</p> <p>Resubmission March 2026: The MCO deleted the statement that the CCS measure became administrative in 2025 and added a statement that no changes have been made to the data collection method for the remeasurement period. The validation score for this evaluation element has been changed to <i>Met</i>.</p>
Results for Step 7			
Total Evaluation Elements**	3	1	Critical Elements***
<i>Met</i>	3	1	<i>Met</i>
<i>Partially Met</i>	0	0	<i>Partially Met</i>
<i>Not Met</i>	0	0	<i>Not Met</i>
<i>N/A (Not Applicable)</i>	0	0	<i>N/A (Not Applicable)</i>
<p>* "C" in this column denotes a critical evaluation element. ** This is the total number of all evaluation elements for this step. *** This is the total number of critical evaluation elements for this step.</p>			

Evaluation Elements	Critical	Scoring	Comments/Recommendations
Performance Improvement Project Validation			
Step 8. Assess the Improvement Strategies: Interventions were developed to address causes/barriers identified through a continuous cycle of data measurement and data analysis. The improvement strategies were developed from an ongoing quality improvement process that included:			
1. A causal/barrier analysis with a clearly documented team, process/steps, and quality improvement tools.	C*	<i>Met</i>	
2. Interventions that were logically linked to identified barriers and have the potential to impact indicator outcomes.	C*	<i>Met</i>	
3. Interventions that were implemented in a timely manner to allow for impact of indicator outcomes.		<i>Met</i>	
4. An evaluation of effectiveness for each individual intervention.	C*	<i>Met</i>	
5. Interventions that were adopted, adapted, abandoned, or continued based on evaluation data.		<i>Not Assessed</i>	The MCO was not required to report next steps for each intervention. The validation score for this evaluation element is <i>Not Assessed</i> .
Results for Step 8			
Total Evaluation Elements**	5	3	Critical Elements***
<i>Met</i>	4	3	<i>Met</i>
<i>Partially Met</i>	0	0	<i>Partially Met</i>
<i>Not Met</i>	0	0	<i>Not Met</i>
<i>N/A (Not Applicable)</i>	0	0	<i>N/A (Not Applicable)</i>
* "C" in this column denotes a critical evaluation element. ** This is the total number of all evaluation elements for this step. *** This is the total number of critical evaluation elements for this step.			

Section 2. Findings: 2025 PIP Validation Tool
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Results for Step 7 - 8			
Total Evaluation Elements	8	4	Critical Elements
<i>Met</i>	7	4	<i>Met</i>
<i>Partially Met</i>	0	0	<i>Partially Met</i>
<i>Not Met</i>	0	0	<i>Not Met</i>
<i>N/A (Not Applicable)</i>	0	0	<i>N/A (Not Applicable)</i>

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

**Section 2. Findings: 2025 PIP Validation Tool
Improving Cervical Cancer Screening Rates
for AmeriHealth Caritas Louisiana**

Table 2—1 2025 PIP Validation Tool Scores for Improving Cervical Cancer Screening Rates for AmeriHealth Caritas Louisiana										
Review Step	Total Possible Evaluation Elements (Including Critical Elements)	Total Met	Total Partially Met	Total Not Met	Total N/A	Total Possible Critical Elements	Total Critical Elements Met	Total Critical Elements Partially Met	Total Critical Elements Not Met	Total Critical Elements N/A
1. Review the Selected PIP Topic	1	1	0	0	0	1	1	0	0	0
2. Review the PIP Aim Statement(s)	1	1	0	0	0	1	1	0	0	0
3. Review the Identified PIP Population	1	1	0	0	0	1	1	0	0	0
4. Review the Sampling Method	5	0	0	0	5	2	0	0	0	2
5. Review the Selected Performance Indicator(s)	2	1	0	0	1	1	1	0	0	0
6. Review the Data Collection Procedures	4	3	0	0	1	2	1	0	0	1
7. Review Data Analysis and Interpretation of Results	3	3	0	0	0	1	1	0	0	0
8. Assess the Improvement Strategies	5	4	0	0	0	3	3	0	0	0
9. Assess the Likelihood that Significant and Sustained Improvement Occurred	4	4	0	0	0	1	1	0	0	0
Totals for All Steps	26	18	0	0	7	13	10	0	0	3

Table 2—2 2025 Overall Confidence of Adherence to Acceptable Methodology for All Phases of the PIP (Step 1 through Step 8) for Improving Cervical Cancer Screening Rates for AmeriHealth Caritas Louisiana	
Percentage Score of Evaluation Elements <i>Met</i> *	100%
Percentage Score of Critical Elements <i>Met</i> **	100%
Confidence Level***	High Confidence

Table 2—3 2025 Overall Confidence That the PIP Achieved Significant Improvement (Step 9) for Improving Cervical Cancer Screening Rates for AmeriHealth Caritas Louisiana	
Percentage Score of Evaluation Elements <i>Met</i> *	100%
Percentage Score of Critical Elements <i>Met</i> **	100%
Confidence Level***	High Confidence

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

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

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

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

EVALUATION OF THE OVERALL VALIDITY AND RELIABILITY OF PIP RESULTS

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

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

Confidence Level for Acceptable Methodology: *High Confidence*

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

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

Confidence Level for Significant Improvement: *High Confidence*