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General Comment

Comment on OMB Control No. 0938-0786 CMS External Quality Review Protocols, December 2018: Protocol 1. Validation of Performance Improvement Project. General: Robustness of interventions would be enhanced by requiring that interventions are measurable using Intervention Tracking Measures to monitor progress of interventions. Specific: Page 51, 8.2: Add bullet to specify that interventions should be measurable on an ongoing basis using Intervention Tracking Measure (e.g., quarterly, monthly, weekly). Refer to the CMS Medicaid Oral Health Performance Improvement Projects: A How-To Manual for States, page 27: "Indicate below the measure you will use to assess progress of the intervention and correct course, as necessary." Page 53, 9.4, Revise "statistical" to "quantitative" and specify reporting and interpretation using Intervention Tracking Measures (quarterly or monthly). The term "statistical" is ambiguous and plans have misused statistical significance testing by applying hypothesis testing to samples that are not independent, e.g., by comparing baseline measurement year to subsequent measurement years.