

## Cabinet and Governor Appointed Agencies' Performance Audit Action Item(s) & Status

### Lead Testing For Children Enrolled in Medicaid

(See also [cabinet agency response](#) for full context to Washington State Auditor's Office (SAO) [report](#), December 2023)

The Department of Health (Health) and the Health Care Authority (HCA) were included for this performance audit.

SAO Recommendations to Health Care Authority (Rec) Summary:

1. Develop and use internal performance measures that capture and track whether all children enrolled in Medicaid are receiving all required blood lead tests.
2. Update contracts with MCOs to establish clear expectations and internal performance measures and thresholds regarding Medicaid testing requirements.
3. Work with the Department of Health (DOH) to ensure all guidance that providers receive from the state about this requirement is clear and consistent and includes contact information for who to contact if a provider has questions about the requirements.
4. Work with DOH to create a communication plan to ensure providers statewide understand this requirement and how to implement it.
5. Educate Medicaid providers to help them understand how in-office lead testing can increase testing rates.
6. Educate Medicaid providers to help them understand how system prompts to health care providers while they are at point-of-care with a patient can help increase compliance with required testing.

SAO Recommendations to Health (Rec) Summary:

7. Create a plan to regularly (at least annually) identify and assess Washington communities (at the census tract or zip code level) that are most at risk for lead exposure. Also, ensure providers have access to community level risk assessments.
8. Work with HCA to finalize a data-sharing agreement (DSA) to conduct a coordinated analysis, at least annually, to determine the extent to which children enrolled in Medicaid are receiving required lead tests, and whether children at the highest risk (based on the risk analysis performed in the previous recommendation) are receiving required testing.
9. Implement its current testing promotion plan and continue to update it at least annually.

The table below shows the current status of action items the agency initiated to address issues identified in the performance audit report. Please see the [cabinet agency response](#) for additional context and any additional steps already taken.

For an explanation of the columns below, [see the legend](#).

Issue/ Rec	Status	Action Steps	Lead Agency	Due Date	Current Resources?	Budget Impact?	Legislation Required?	Notes
Rec 1	Complete	To better align the existing national tracking of lead screening in children with	HCA	12/31/25	Yes, staff.	No.	No, not at this time.	Feedback was given in writing outside the usual measure change cycle and NCQA acknowledged the comments. Further,

Issue/ Rec	Status	Action Steps	Lead Agency	Due Date	Current Resources?	Budget Impact?	Legislation Required?	Notes
		Medicaid requirements, HCA will provide feedback to the measure sponsor on alignment when the measure is next open for public comment. While there is an annual measure review process, the measure is not required to be opened up for comment as part of that process. Because of this, we do not have an anticipated completion date but will monitor annually and provide feedback when we are able.						they indicated interest in more discussion on the topic. We will monitor the annual feedback process to support this messaging again to NCQA to reaffirm our earlier message.
1	Complete	Convene a work group to explore the feasibility of additional utilization tracking that aligns with the Medicaid requirements.	HCA	6/30/24	Yes, staff.	No, not at this time.	No, not at this time.	An initial meeting was held between HCA and DOH in August 2024. HCA's internal workgroup has met multiple times to plan and address issues related to lead testing for children enrolled in Medicaid. HCA is working with DOH to schedule an HCA/DOH coordinated workgroup.
2	Complete	Update the language in the Managed Care Organization contracts to clarify expectations for blood lead testing.	HCA	1/31/25	No.	No.	No.	The Managed Care contracts were amended with an effective date of 7/31/2024.
3-4	Complete	Work with DOH to establish a work group that will develop a plan to address recommendations 3 & 4.	HCA	6/30/24	Yes, staff.	No, not at this time.	No, not at this time.	An initial meeting was held between HCA and DOH in August 2024. HCA's internal workgroup has met multiple times to plan and address issues related to lead testing for children enrolled in Medicaid. HCA is working with DOH to schedule an HCA/DOH coordinated workgroup.

Issue/ Rec	Status	Action Steps	Lead Agency	Due Date	Current Resources?	Budget Impact?	Legislation Required?	Notes
5-6	Complete	Establish a work group that will develop a plan to address recommendations 5 & 6.	HCA	6/30/24	Yes, staff.	No, not at this time.	No, not at this time.	An initial meeting was held between HCA and DOH in August 2024. HCA's internal workgroup has met multiple times to plan and address issues related to lead testing for children enrolled in Medicaid. HCA is working with DOH to schedule an HCA/DOH coordinated workgroup.
7	In Progress	Work to identify a funding source for a new epidemiologist.	Health	<del>6/30/24</del> 12/31/24	Yes, staff.	Yes	No, not at this time.	DOH is working with HCA to update the Interagency Agreement to include an epidemiologist to do this work. This will provide a 50% match for foundational public health funding the lead program has. Once the contract is updated and the epi is hired, the remaining steps will begin.
7	Not Started	Review existing risks, definitions and analysis to identify opportunities to improve existing risk factors displayed on WTN.	Health	6/30/25	Yes, staff.	Yes	No, not at this time.	Over the past year CLPPP staff have worked with the WTN team to add the percentage of children under 72 months of age tested for blood lead levels at the county level. This map is now available as an overlay to the <a href="#">Lead Exposure Risk map</a> on WTN's Information by Location tool. In addition, 1 km proximity to airports has been added to the map.
7	Not Started	Develop an action plan to integrate changes to WTN.	Health	12/31/25	No, not at this time.	Yes	No, not at this time.	The new epi will be tasked with identifying new changes and developing a plan.
7	In Progress	Identify and assess Washington communities that are most at risk for lead exposure at the census tract or zip code level as available in WTN, as part of updating the Testing Promotion Plan. Continue annually thereafter.	Health	<del>12/31/24</del> 3/1/25	Yes, staff.	No, not at this time.	No, not at this time.	The current testing plan includes a WTN overview in Appendix B. Risk by county, smelter plume and former orchard lands are highlighted. As mentioned above the county-level testing overlay is now available.  This will be included in updates to the testing promotion plan as part of recommendation 9.

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8	In Progress	Fully execute the data sharing agreement.	Health	<del>3/31/24</del> 4/30/25	Yes, staff.	No, not at this time.	No, not at this time.	DOH and HCA are still in the process of finalizing HCA Medicaid Data Sharing Agreement.
8	Not started	Identify work group members from HCA and DOH.	Health	<del>3/31/24</del> 5/31/25	Yes, staff.	No, not at this time.	No, not at this time.	Cannot move forward until the DSA is signed.
8	Not started	Begin work group meetings.	Health	<del>6/1/24</del> 6/30/25	Yes, staff.	No, not at this time.	No, not at this time.	This will move forward once the DSA is signed. Additionally, working on having the IAA Contract with HCA updated and the Epidemiologist hired.
8	Not started	Review and solidify an initial set of core performance measures, as well as a reporting format that would be beneficial for both agencies.	Health	<del>12/31/24</del> 12/31/25	Yes, staff.	Yes	No, not at this time.	This will move forward once the DSA is signed. Additionally, working on having the IAA Contract with HCA updated and the Epidemiologist hired.
9	Complete	Finalize and communicate the testing promotion plan.	Health	1/31/24	Yes, staff.	No, not at this time.	No, not at this time.	Testing promotion plan was finalized in December 2023 and published on the DOH website- <a href="#">Washington State Child Lead Screening and Testing Plan January 2024</a>
9	Complete	Launch and implement the testing promotion plan.	Health	12/31/24	Yes, staff.	No, not at this time.	No, not at this time.	All identified activities in the testing promotion plan have been implemented. The testing promotion plan was posted early 2024.
9	In Progress	Identify HCA contact(s) to assist with the test plan review and modification.	Health	<del>6/30/24</del> 6/30/25	Yes, staff.	No, not at this time.	No, not at this time.	After this year's update of the Testing Promotion Plan, DOH will identify and invite HCA review and input into the updated plan.
9	In Progress	Update and publish the testing plan. Continue annually thereafter.	Health	<del>12/31/24</del> 3/31/25	Yes, staff.	No, not at this time.	No, not at this time.	Edits to testing plan are in process and the updated plan will be drafted by 12/31/2024 and will be completed in early 2025.  The testing promotion coordinator position was vacant for four months this last year causing delay with updating the plan.