

THE HEDIS INSURGENCY: BUILDING AI AGENT ARMY TO HACK HEALTHCAR QUALITY MEASUREMENT

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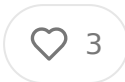


TABLE OF CONTENTS

- 1. Introduction
- 2. The HEDIS Measurement Problem
- 3. Market Opportunity and Economics
- 4. Technical Architecture and AI Agent Design
- 5. Agent Army Operations and Coordination
- 6. Clinical Workflows and Integration Points
- 7. Business Model and Go-to-Market Strategy
- 8. Competitive Landscape and Differentiation
- 9. Implementation Roadmap and Scaling Strategy
- 10. Risks, Challenges, and Mitigation
- 11. Conclusion

ABSTRACT

Disclaimer: The views and opinions expressed in this essay are my own and do not reflect the positions, strategies, or opinions of my employer or any affiliated organizations.

This dossier presents a technical and business framework for a health technology company built around deploying specialized AI agents to systematically improve Healthcare Effectiveness Data and Information Set (HEDIS) measures across health plan populations. The core innovation involves creating an "agent army" where each agent specializes in a specific HEDIS measure or clinical pathway, operating semi-autonomously while coordinating through a central orchestration layer. The company would generate revenue through performance-based contracts tied to quality measure improvement, targeting the approximately \$60 billion annual flow between CMS Medicare Advantage plans based on Star Ratings. Key technical components include multi-modal data ingestion from claims, EHR, and pharmacy systems; specialized large language models fine-tuned for clinical workflows; real-time decisioning engines; and integration with existing care management platforms. The business model leverages risk-sharing arrangements where the company captures 30-50% incremental quality bonus payments generated through measurable HEDIS improvements. Primary risks include regulatory scrutiny of AI in clinical workflow integration complexity with legacy health IT systems, and the challenge of maintaining AI model performance across diverse health plan populations.

Introduction

The American healthcare system runs on measures that nobody particularly likes but everyone must obsess over. Chief among these are the Healthcare Effectiveness Data and Information Set measures, those seventy-some metrics that determine whether health plans receive applause or penalties from the National Committee for Quality Assurance. If you have spent any time inside a Medicare Advantage plan during September and October, you have witnessed the annual HEDIS panic, where entire organizations mobilize to close care gaps before the measurement period ends.

Clinical teams make frantic outreach calls to patients who need colorectal cancer screenings. Pharmacy teams scramble to improve medication adherence rates. Care coordinators chase down hemoglobin A1c results for diabetic patients. The whole enterprise feels simultaneously critical and absurd, like watching a hospital try to simultaneously treat patients while also making sure the right boxes get checked for regulators.

This frenzy exists because HEDIS measures directly translate into revenue through Medicare Advantage Star Ratings and increasingly through Medicaid managed care quality bonuses. A half-star improvement in Star Ratings can mean hundreds of millions of dollars in additional revenue for a large Medicare Advantage plan. The stakes are extraordinary. Yet the fundamental approach to HEDIS improvement remained remarkably unchanged for two decades. Health plans employ armies of nurses to review charts and make outreach calls. They build care gap reports that physicians largely ignore. They implement clunky clinical decision support systems that interrupt workflows without providing real value. Billions of dollars get spent on this infrastructure every year, yet many health plans still struggle to move their metrics meaningfully.

What if instead of this traditional approach, we built something completely different? What if we created an actual army of artificial intelligence agents, each one specialized and relentless, each one focused on a single HEDIS measure, each one capable of operating semi-autonomously while coordinating with hundreds of similar agents in a shared mission to systematically dismantle care gaps across an entire health population? This is not a metaphor. This is a technical architecture and business model for a company that could fundamentally change how health plans approach quality measurement.

The HEDIS Measurement Problem

Before diving into the solution, we need to understand the problem with sufficient granularity. HEDIS measures come in several flavors, each with distinct technical challenges. Some measures are purely administrative, calculable entirely from cl

data. Others are hybrid measures requiring both claims data and medical record review. Still others are survey-based measures dependent on patient-reported outcomes. For our purposes, we focus on the seventy-two measures that matter for Medicare Advantage Star Ratings and Medicaid managed care quality programs.

Consider the complexity of a single measure like Diabetes Care - Blood Sugar Controlled. This measure requires identifying all plan members with diabetes, determining whether they received a hemoglobin A1c test in the measurement year, extracting the test result, and categorizing control status. Simple in theory. In practice, this requires parsing International Classification of Diseases codes from medical and pharmacy claims to identify the denominator population, integrating with laboratory information systems or medical records to retrieve test results, handling missing data when results are not available electronically, coordinating medical record retrieval from hundreds of provider practices, abstracting values from unstructured clinical notes when structured data is unavailable, and managing the logic for exclusions when patients have specific conditions that make the measure inapplicable.

Multiply this complexity by seventy-two measures. Add the reality that each measure has different numerator and exclusion criteria that change annually. Layer on the fact that health plans typically have provider networks spanning hundreds or thousands of independent practices with wildly varying levels of health IT sophistication. Factor in that many critical data elements live in unstructured clinical documentation rather than discrete fields. The result is a measurement and improvement problem of staggering technical complexity.

The current market solution involves mostly human labor. Health plans employ thousands of nurses who manually review medical records, either on-site at provider practices or through electronic record retrieval. They use care management platforms from companies like Arcadia, Innovaccer, or Lightbeam to generate care gap reports. Many health plans contract with specialized HEDIS vendors like Inovalon or HealthEdge for chart review, data retrieval and abstraction services. Some forward-thinking plans have begun experimenting with natural language processing to extract data from clinical notes, but these efforts remain nascent and narrow in scope. The entire ecosystem is built on a foundation of human labor.

around humans doing most of the cognitive work, with technology serving primarily as data aggregation and workflow management infrastructure.

The cost structure is punishing. Large Medicare Advantage plans spend tens of millions of dollars annually on HEDIS-related activities. This includes salaries for internal quality teams, contracts with chart retrieval vendors at thirty to sixty dollars per record, fees for care management platform licenses, and payments to provider practices for quality improvement initiatives. Meanwhile, physician practices face their own HEDIS burden in the form of additional documentation requirements, quality reporting workflows, and participation in endless health plan quality programs. The friction and expense in the system are enormous, yet the measures themselves are not going away. If anything, quality measurement is expanding in new domains as value-based care becomes more prevalent.

Market Opportunity and Economics

The total addressable market for HEDIS improvement is actually quite tractable to estimate with reasonable precision. Start with Medicare Advantage. Approximately twenty-nine million beneficiaries are enrolled in Medicare Advantage plans as of 2024. CMS pays Medicare Advantage plans roughly five percent bonus payments for achieving four or more stars, with additional quality bonus payments for five-star plans. The average Medicare Advantage per-member-per-month payment is around one thousand dollars, meaning approximately three hundred fifty billion dollars annually from CMS to Medicare Advantage plans. A conservative estimate suggests that approximately sixty billion dollars of this is directly or indirectly tied to quality performance through Star Ratings bonuses and quality-adjusted benchmarks.

The incremental revenue opportunity from Star Ratings improvement is substantial. Moving from 3.5 stars to 4.0 stars can generate an additional five percent revenue increase for a plan. For a plan with one million Medicare Advantage members, this translates to approximately six hundred million dollars in annual run-rate revenue increase. The willingness to pay for technology and services that can reliably deliver this improvement is correspondingly high. Health plans will readily pay twenty t

thirty percent of incremental quality bonus revenue for solutions that demonstrate a move to 5 Star Ratings.

Medicaid managed care represents a parallel opportunity. Approximately forty-two million beneficiaries receive Medicaid benefits through managed care plans. While Medicaid quality bonus programs vary by state, an increasing number of states have implemented meaningful quality-based payment programs. States like Pennsylvania, Ohio, and Michigan have quality withhold programs where five to ten percent of capitation payments are at risk based on HEDIS performance. The total Medicaid managed care market exceeds three hundred billion dollars annually, with approximately fifteen to twenty billion dollars likely tied to quality performance.

Beyond the direct financial incentive, there is a secondary market in provider-sponsored health plans and risk-bearing provider organizations. As more physician groups take on full or partial risk through Accountable Care Organizations and contracting arrangements, they face the same HEDIS improvement challenges as traditional payers. The number of beneficiaries attributed to risk-bearing provider entities exceeds fifteen million in Medicare alone, creating an adjacent market for quality improvement solutions.

The competitive landscape for capturing this opportunity is fragmented. Existing point solutions address narrow slices of the problem. Care management platforms provide data aggregation and workflow tools but rely on humans for intervention. Natural language processing vendors extract some data from clinical notes but do not drive interventions. Traditional HEDIS vendors focus on chart retrieval and abstraction but do not close care gaps. Disease management companies provide outreach but lack the technical sophistication for measure-specific optimization. A company that has built a comprehensive, measure-specific, AI-agent-driven platform can systematically drive improvement across the full HEDIS measure set.

This represents a classic market inefficiency. The total pain is enormous, the willingness to pay is high, the existing solutions are inadequate, and the technical capabilities to build something better now exist in ways they did not five years ago.

The window is open for a well-capitalized entrant with strong technical capabilities and deep healthcare domain expertise.

Technical Architecture and AI Agent Design

The core technical innovation is building an army of specialized AI agents where each agent is purpose-built for a specific HEDIS measure or clinical workflow. This is not a single general-purpose AI trying to do everything. Instead, imagine seventy distinct agents, each one an expert in its domain, each one continuously operating across the health plan population to identify opportunities, prioritize interventions, execute outreach, coordinate with providers, and measure impact.

The architecture has several layers. At the foundation is a data ingestion and harmonization layer that connects to all relevant data sources within a health plan. This includes claims data warehouses, electronic health record systems via FHIR/HL7 interfaces, pharmacy systems, laboratory information systems, health information exchanges, and care management platforms. The data layer must handle both structured and unstructured data, must resolve patient identity across disparate systems, must maintain data freshness with near-real-time updates for critical workflows, and must ensure appropriate privacy and security controls throughout. This is table-stakes health IT infrastructure, difficult but well-understood.

Above the data layer sits the agent orchestration platform. This is where things get interesting. Each agent is implemented as a specialized large language model fine-tuned on clinical documentation, medical coding, and workflows specific to its target measure. For example, the Colorectal Cancer Screening agent would be trained on gastroenterology notes, pathology reports, and colonoscopy documentation. It would understand the nuances of when a colonoscopy is truly diagnostic versus screening, how to interpret CT colonography results, and when fecal immunochemical tests are appropriate alternatives. The agent would maintain a dynamic model of every eligible member in its population, understanding current gap status, prior outreach attempts, barriers to completion, and optimal intervention strategies.

The agents operate through a continuous sense-and-respond loop. Every day, each agent reviews its population, identifies new opportunities based on fresh data, prioritizes interventions based on likelihood of success and impact on overall measure performance, selects appropriate intervention modalities, executes outreach through various channels, monitors responses, adjusts strategies based on outcomes, and coordinates with other agents when interventions overlap. This is not batch processing. This is continuous, real-time operation with agents making thousands of micro-decisions daily.

The model architecture for each agent combines several components. A base large language model, likely something in the GPT-4 or Claude-3 class, provides general language understanding and reasoning capabilities. A fine-tuning layer specializes the model for clinical documentation and workflows specific to the target measure. A retrieval-augmented generation system allows the agent to query relevant clinical guidelines, measure specifications, and patient-specific data to ground its decisions. A policy layer encodes business rules, compliance constraints, and escalation criteria. A reinforcement learning component allows the agent to improve over time based on outcomes.

The intervention toolkit available to agents is multimodal. Agents can generate natural language outreach via SMS, email, or interactive voice response systems. They can create faxes to provider offices requesting specific documentation or actions. They can populate task lists within provider EHR systems where integration exists. They can schedule care gap closure visits by interfacing with practice management systems. They can identify transportation or language barriers and coordinate appropriate support services. They can escalate complex cases to human care managers with detailed briefings on the clinical situation and recommended approaches.

A critical technical challenge is coordination between agents. A single patient may have care gaps across fifteen different HEDIS measures. We cannot have fifteen different agents simultaneously bombarding that patient with outreach. The orchestration layer manages these conflicts through a priority ranking system based on clinical urgency, likelihood of success, and impact on overall Star Ratings. Agents negotiate resources through an internal market mechanism where higher-priorit

interventions get preferential access to outreach channels and care management support. This prevents both patient overwhelm and resource waste while ensuring that the most valuable opportunities receive attention.

The system requires robust monitoring and evaluation infrastructure. Each agent tracks detailed performance metrics including population size, current performance rate, care gap closure rate, cost per intervention, and projected end-of-year performance. The platform provides real-time dashboards showing aggregate performance across all measures, identifying underperforming agents or measures, highlighting emerging opportunities, and projecting final Star Ratings based on current trajectories. This creates a flywheel where underperforming measures automatically receive additional resources and attention.

Integration points with existing health plan systems are essential for practical deployment. The platform must integrate with existing care management systems to avoid creating a parallel workflow universe. It must connect to provider portals and EHR systems to enable seamless information exchange. It must interface with member engagement platforms to coordinate outreach. It must feed into quality reporting systems to ensure measure performance is properly captured. The business reality is that health plans will not rip out their existing infrastructure, so the new system must wrap around and enhance what already exists.

Agent Army Operations and Coordination

The operational model for the agent army is where the metaphor becomes concrete. Each agent operates with a high degree of autonomy within defined parameters, but all agents coordinate through a central command structure that manages resources, resolves conflicts, and ensures overall mission success. Think of it as a military command structure applied to healthcare quality measurement.

Individual agents maintain situational awareness of their entire eligible population. For a health plan with one million members, the Diabetes Care agent might be responsible for eighty thousand members with diabetes. The agent maintains a detailed profile for each member including current gap status, clinical complexity,

social determinants of health, prior engagement history, and predicted likelihood of gap closure. Every morning, the agent reviews overnight data feeds to identify new gaps, new eligible members, and changes in clinical status. Based on this updated intelligence, the agent reprioritizes its intervention queue.

The prioritization algorithm balances multiple objectives. Clinical urgency comes first—a patient with uncontrolled diabetes who has not seen a provider in eight months receives higher priority than a patient with well-controlled diabetes who needs an annual eye exam. Likelihood of success factors in—patients who have responded to prior outreach and have scheduled appointments are higher priority than patients who have never engaged. Impact on measure performance matters—the measurement year progresses, interventions that can still impact the current rating take precedence over interventions that will only help future years. Cost-effectiveness plays a role—high-touch interventions requiring care manager involvement are reserved for situations where they are most likely to succeed.

Agents execute interventions across multiple channels simultaneously. For a patient who needs colorectal cancer screening, the agent might send an educational SMS message about screening options, generate a reminder notice to be included in the patient's next mailing, populate a best practice alert in the patient's primary care physician's EHR, send a fax to the physician's office with a pre-filled screening card, and flag the patient for a care manager call if no action is taken within thirty days. This multi-touch, multi-channel approach dramatically increases conversion rates compared to single-mode outreach.

The agents learn continuously from outcomes. When an intervention succeeds or fails, the agent updates its model of what works for different patient segments. It might learn that Spanish-speaking patients over seventy respond better to phone calls than text messages, or that patients in rural areas need transportation assistance to complete screening appointments, or that certain physician practices are highly responsive to faxed reminders while others ignore them entirely. This learning propagates across the agent network, so insights gained by one agent can inform strategies of other agents working with similar populations.

Coordination between agents prevents conflicts and optimizes resource utilization. The central orchestration layer maintains a master calendar of all planned interventions for every patient. When multiple agents want to contact the same patient, the orchestration layer sequences these contacts to avoid overwhelming the patient. It might batch several reminders into a single communication, or it might space outreach across several weeks. The orchestration layer also manages access to limited resources like care manager time, transportation assistance, and high-touch interventions.

The agent army scales elegantly. Adding a new HEDIS measure means developing and deploying a new specialized agent, but the orchestration infrastructure and data foundations remain unchanged. Onboarding a new health plan client means configuring the agents for that plan's specific population characteristics and provider network, but the core agent logic is reusable. This creates powerful economies of scale as the platform grows across multiple health plans.

Clinical Workflows and Integration Points

The ultimate test of any health IT system is whether it integrates into actual clinical workflows without creating additional burden. Physicians are already overwhelmed with electronic alerts, quality measures, and administrative tasks. Adding another system that interrupts their workflow with more requests is a recipe for failure. An agent platform must be designed from the ground up to augment rather than interrupt clinical workflows.

The primary integration point is the electronic health record. For health systems and practices using major EHR platforms like Epic or Cerner, the agents can write directly into the EHR using FHIR APIs or proprietary integration mechanisms. This allows agents to populate care gap reminders, screening orders, and best practice alerts that appear within the physician's normal workflow. The key is making these alerts contextually relevant and actionable. An alert that appears when a diabetic patient is in the office for an annual physical and reminds the physician to order an A1c test is helpful. An alert that fires randomly when the patient is not present is noise.

The agents use natural language generation to create clinical documentation that physicians can easily incorporate into their notes. For example, if a patient needs medication reconciliation for a diabetes medication adherence measure, the agents generate a pre-filled medication list with suggested changes based on claims data showing which medications the patient is actually filling. The physician can review, modify, and sign this documentation rather than creating it from scratch. This turns the quality measure from a burden into a tool that actually helps the physician provide better care.

Provider practices without sophisticated EHR integration capabilities receive support through traditional channels that are enhanced by AI. The agents generate intelligent faxes that include patient-specific information, clear action requests, and pre-filled order forms. Unlike generic care gap reports that list dozens of patients and measures, these faxes are targeted, specific, and actionable. A practice might receive a fax saying that Mrs. Johnson is scheduled for an appointment next Tuesday and a colorectal cancer screening, along with a pre-filled order for a colonoscopy including the appropriate CPT code and suggested gastroenterology referrals.

The agents also integrate with scheduling systems to proactively create opportunities for care gap closure. If a patient needs multiple preventive services, the agent can coordinate with the practice's scheduling system to book an extended visit that allows time to address all outstanding items. The agent can identify schedule openings and suggest appointment times to patients through automated outreach. For patients who have not been seen recently, the agent can trigger proactive outreach offering to schedule an appointment and providing multiple convenient time slots.

Pharmacy integration creates additional intervention opportunities. Many HEDIS measures relate to medication adherence, which requires understanding not just whether prescriptions are written but whether they are being filled and taken. The agents integrate with pharmacy claims data and can trigger interventions when adherence drops. They can coordinate with pharmacies to set up automatic refill reminders, remind patients when medications are due, and alert prescribers when patients repeatedly fail to fill prescriptions. For diabetes medication adherence measures

agents can identify patients who are sub-optimally controlled and work with prescribers to intensify therapy.

Laboratory integration closes a major data gap. Many hybrid HEDIS measures rely on lab results that are not always available through claims data. The agents integrate with major laboratory information systems to retrieve test results directly. When results are not available electronically, the agents orchestrate medical record retrieval and abstracting results from clinical documents using natural language processing. This eliminates the need for expensive manual chart review for many measures.

The platform includes a provider portal where practices can view all outstanding quality gaps for their patients, submit documentation to close gaps, and track their performance on quality measures. The portal provides value to practices beyond HEDIS reporting by helping them succeed in value-based payment arrangements by identifying patients who need outreach for chronic disease management. This creates a positive incentive for providers to engage with the platform rather than viewing it as just another health plan reporting burden.

Business Model and Go-to-Market Strategy

The business model is structured around performance-based risk-sharing contracts where the company captures a percentage of incremental quality bonus revenue generated through measurable HEDIS improvement. This aligns incentives perfectly with health plan customers and ensures that the company only makes money when it delivers real value.

A typical contract structure works as follows. The company establishes a baseline performance level for each HEDIS measure based on the health plan's most recently reported performance. The company then commits to delivering measurable improvement above baseline, typically targeting improvements of five to fifteen percentage points on key Star Ratings measures over an eighteen-month engagement. The company receives payment based on the incremental quality bonus revenue

generated by this improvement, typically capturing thirty to fifty percent of the created.

For a Medicare Advantage plan with one million members, moving from 3.5 star 4.0 stars generates approximately six hundred million dollars in incremental revenue. If the company can demonstrate that its interventions were responsible for the improvement, a thirty percent share would yield one hundred eighty million dollars in revenue. Even after accounting for technology costs, data integration expenses, and operational overhead, the unit economics are extremely attractive.

The payment structure includes both upfront platform fees and success-based performance payments. The upfront platform fee covers data integration, agent deployment, and ongoing operational costs. This might be five to ten million dollars for a large health plan, paid as a monthly subscription over the contract term. The performance payments are paid quarterly in arrears based on actual measured improvement in HEDIS rates. This structure ensures the company has sufficient capital to operate while aligning long-term incentives with customer success.

The go-to-market strategy focuses initially on Medicare Advantage plans where financial incentives for quality improvement are most direct and substantial. The target customer profile is a plan with five hundred thousand to two million Medicare Advantage members, current Star Ratings between 3.0 and 4.0 stars, and demonstrated strategic commitment to quality improvement. These plans have the scale to justify the implementation investment while having sufficient room for improvement to generate meaningful financial returns.

The sales process is technical and consultative, typically requiring six to twelve months from initial engagement to signed contract. The process begins with a detailed analysis of the health plan's current HEDIS performance, identifying specific measures where the agent platform can drive improvement. The company provides a detailed financial model projecting the expected revenue impact of improvement across each measure and demonstrating the ROI of the engagement. This analysis phase builds credibility and allows both parties to align expectations before committing to a contract.

Proof of concept engagements provide a lower-risk entry point for health plans hesitant to commit to a full deployment. A typical proof of concept focuses on the five measures where the plan is underperforming and where the technical integration is relatively straightforward. The proof of concept runs for six months and includes partial deployment of the agent platform, limited integration with health plan systems, and focused interventions on a subset of the member population. Successful proof of concept creates a pathway to full deployment.

The customer success organization is critical to long-term retention and expansion. Each health plan customer is assigned a dedicated customer success team including a strategic account director, clinical operations lead, and technical integration manager. This team works closely with the health plan's quality and clinical operations teams to ensure smooth deployment, address technical issues, optimize agent performance, and demonstrate value through regular business reviews. The goal is to become deeply embedded in the customer's operations and to expand from initial deployments to additional measures, member populations, and product lines.

Expansion opportunities within existing customers are substantial. Initial deployments might focus on Medicare Advantage, but successful engagements create opportunities to expand into Medicaid, commercial populations, and provider-sponsored health plans. The platform can also expand beyond HEDIS into other quality measurement frameworks like Merit-based Incentive Payment System measures for providers or condition-specific quality measures for disease management programs.

The competitive moat deepens over time through several mechanisms. The agent continuously learns from interventions across all customer deployments, improving their effectiveness through accumulated experience. The platform's integration with health plan and provider systems creates switching costs. The performance-based business model aligns incentives in ways that traditional software-as-a-service models do not. The clinical credibility built through successful deployments creates strong word-of-mouth marketing effects in the relatively small community of Medicare Advantage quality leaders.

Competitive Landscape and Differentiation

The competitive landscape includes several categories of companies addressing parts of the HEDIS improvement problem. Understanding how this platform differs from existing solutions is essential for positioning and for anticipating competitor responses.

Care management platforms like Arcadia, Innovaccer, and Lightbeam provide data aggregation, analytics, and workflow management tools for health plans and risk-bearing providers. These platforms excel at identifying care gaps and providing dashboards and reports to care teams. However, they are fundamentally passive tools that require human users to drive interventions. They do not autonomously execute outreach, do not continuously optimize intervention strategies, and do not provide measure-specific intelligence that specialized agents can deliver. The agent platform can integrate with these existing care management platforms, enhancing their value rather than replacing them entirely.

Natural language processing vendors like Apixio, Talix, and Health Fidelity focus on extracting data from unstructured clinical documentation to improve risk adjustment and HEDIS reporting. These solutions are valuable for identifying previously uncaptured diagnoses and for retrieving data needed for hybrid measures. However, they do not close care gaps or drive interventions. They are data extraction tools rather than intervention platforms. The agent platform incorporates similar natural language processing capabilities as one component of a much broader intervention system.

Traditional HEDIS vendors like Inovalon, HealthEdge, and Advantmed provide coding, retrieval, abstraction, and coding services. These companies employ large teams of nurses who manually review medical records to capture data for HEDIS reporting. This is labor-intensive and expensive, typically costing thirty to sixty dollars per record reviewed. The agent platform can automate much of this work through natural language processing while also driving interventions to close gaps before they re

expensive manual chart review. This creates a cost advantage while also improving outcomes.

Disease management and care coordination companies like Livongo, Omada, and Health provide coaching and engagement programs for specific conditions. These programs can help improve outcomes for enrolled members but typically reach a small percentage of the eligible population and focus on patient engagement rather than comprehensive HEDIS measure improvement. The agent platform operates at population scale and addresses the full HEDIS measure set rather than focusing on narrow condition-specific interventions.

Point solution vendors address specific HEDIS measures or workflows. For example, companies like Memora Health or Luma Health focus on appointment reminder and care gap outreach through SMS and voice channels. These tools are useful but narrow in scope and lack the measure-specific intelligence and multi-modal intervention capabilities of specialized agents. The agent platform incorporates similar communication capabilities while adding layers of clinical intelligence, provider integration, and continuous optimization.

The fundamental differentiation is the comprehensive, measure-specific, AI-driven approach. No existing competitor has built specialized agents for each HEDIS measure that operate autonomously, learn continuously, coordinate with each other, and integrate across the full spectrum of clinical workflows. The vision is not to build another dashboard or reporting tool but to build an actual autonomous system that drives measurable improvement without requiring proportional increases in human labor.

Secondary differentiation comes from the performance-based business model. Most competitors charge subscription fees or per-member-per-month rates regardless of whether quality measures actually improve. This creates misaligned incentives and makes it difficult for health plans to justify the investment when outcomes are uncertain. The risk-sharing model ensures that the company succeeds only when customers succeed, creating a true partnership rather than a vendor relationship.

The clinical credibility of the team and advisory board provides another competitive advantage. The company must be founded and led by individuals with deep experience in both healthcare operations and AI technology. Having former health plan chief medical officers, quality directors, and payer executives on the team or advisory board provides credibility with customers and ensures that the product is designed around real clinical workflows rather than technology for its own sake. The founding team should include engineers who have built production large language model systems, healthcare data architects with experience integrating disparate health IT systems, and clinical informaticists who understand the nuances of quality measurement.

Implementation Roadmap and Scaling Strategy

The implementation roadmap for a new customer follows a structured process designed to minimize disruption while maximizing speed to value. The process typically takes three to six months from contract signature to full production deployment, with incremental value being delivered throughout.

Phase one is data integration and platform configuration. This involves establishing secure connections to all relevant health plan data sources, mapping data elements to the platform's standardized schema, configuring the agents for the specific population characteristics and provider network, and establishing user accounts and access controls. This technical work happens largely in the background and requires close coordination between the company's technical team and the health plan's IT and security organizations. The goal is to have complete, accurate, real-time data flow into the platform before any interventions begin.

Phase two is pilot deployment on selected measures. Rather than attempting to connect all seventy agents simultaneously, the initial deployment focuses on five to ten measures where the health plan has the greatest opportunity for improvement and where the technical integration is most straightforward. This might include measures like Colorectal Cancer Screening, Diabetes Care - Blood Sugar Controlled, and Lung Cancer Screening. The agents begin operating on these measures, executing outreach

coordinating with providers, and tracking outcomes. This pilot phase typically runs for sixty to ninety days and provides an opportunity to refine workflows, adjust intervention strategies, and demonstrate early wins.

Phase three is full deployment across the remaining measures. Based on learning from the pilot, the remaining agents are deployed in waves, typically adding ten to fifteen measures every month until full deployment is complete. Each wave includes training for health plan staff, integration with additional provider systems, and refinement of intervention strategies. By the end of phase three, all agents are operational and the full platform is running at scale.

Phase four is continuous optimization and expansion. Once the platform is fully deployed, the focus shifts to optimization. Agents continuously learn from outcomes and refine their intervention strategies. The orchestration layer improves its coordination algorithms based on observed resource utilization and outcomes. New integration points with provider systems are added to increase automation and reduce friction. Additional services like transportation assistance or interpreter service are incorporated to address barriers to care gap closure.

The scaling strategy balances breadth and depth. The initial focus is on achieving deep success with a small number of flagship customers, proving that the platform can deliver measurable improvement in HEDIS measures and generate real financial returns. Success with these initial customers creates case studies and references that accelerate sales cycles with new customers. Once the platform is proven with five to ten customers representing several million members, the focus shifts to rapid customer acquisition.

Scaling requires building operational capabilities in parallel with technology development. The customer success organization must grow to support an expanding customer base. The clinical operations team must be able to handle increasing volumes of escalations and edge cases that require human intervention. The integration team must be able to onboard new customers quickly without compromising on integration quality. The data engineering team must ensure that

platform can handle growing data volumes as the member population under management expands.

The company should target managing ten million covered lives by year three and thirty million covered lives by year five. At these volumes, the platform would be managing a material percentage of the total Medicare Advantage and Medicaid managed care populations. The revenue model scales elegantly with covered lives; the performance-based payments are directly tied to the size of the population and the magnitude of improvement achieved.

Risks, Challenges, and Mitigation

No business plan is complete without honest assessment of risks and challenges. Several categories of risk must be carefully managed for the company to succeed.

Regulatory risk is substantial. The use of AI in clinical decision-making is an evolving area with uncertain regulatory requirements. While the agents are primarily driving administrative and outreach functions rather than making clinical decisions, regulators may still scrutinize the platform for potential patient safety issues or algorithmic bias. Mitigation strategies include maintaining rigorous clinical oversight of agent recommendations, implementing human-in-the-loop review for high-stakes interventions, ensuring transparency in how agents make decisions, and engaging proactively with regulators to shape appropriate oversight frameworks.

Integration risk is perhaps the most immediate challenge. Health IT systems are notoriously difficult to integrate, with inconsistent data standards, limited API availability, and resistance from entrenched vendors. Every new customer requires custom integration work, and some critical data sources may prove impossible to access electronically. Mitigation requires building a flexible integration architecture that can accommodate diverse systems, investing in strong relationships with major EHR vendors to facilitate integration, and having fallback processes for manual data collection when automated integration is not feasible.

Clinical efficacy risk is the possibility that the agents' interventions do not actually improve HEDIS measures at the scale and speed needed to justify the business model. Early pilots might show promising results that do not replicate at full scale, or interventions might be less effective in certain populations or market conditions. Mitigation involves rigorous measurement and evaluation of intervention effectiveness, rapid iteration based on outcomes, building diverse clinical expertise into the product development process, and maintaining realistic projections about achievable improvement rates.

Algorithmic bias risk is critical in healthcare applications. If the agents learn patterns that disadvantage certain demographic groups or inadvertently deprioritize vulnerable populations, the platform could perpetuate or worsen existing health disparities. Mitigation requires continuous monitoring for disparate impact across demographic groups, incorporating health equity metrics into agent optimization objectives, maintaining diverse clinical and technical teams that can identify potential bias issues, and being transparent with customers about how the platform addresses equity considerations.

Business model risk relates to the performance-based payment structure. If improvements in HEDIS measures are difficult to attribute to the platform's interventions versus other concurrent quality initiatives, customers may be reluctant to pay performance bonuses. Similarly, if external factors like changes in measure specifications or member population mix confound measurement of improvement, disputes over payment may arise. Mitigation requires establishing clear measure methodologies upfront, using control groups or statistical modeling to isolate the platform's impact, maintaining strong relationships with customers built on trust and transparency, and being willing to adjust payment terms when external factors materially impact outcomes.

Competitive response risk is the possibility that incumbents or well-capitalized entrants rapidly replicate the approach. Large care management platform vendors could build similar agent capabilities, or major payers could decide to build proprietary solutions in-house. Mitigation comes from moving quickly to establish a strong market position, building integration depth and clinical credibility that a

difficult to replicate, continuously innovating to stay ahead of competitors, and potentially pursuing strategic partnerships or acquisitions to consolidate the market.

Talent risk is significant given the specialized expertise required. The company needs people who understand healthcare operations, quality measurement, AI technology, and clinical workflows. This talent is scarce and highly sought after. Mitigation requires competitive compensation, equity participation for key team members, a mission-driven culture that attracts people passionate about improving healthcare, and strong partnerships with academic institutions to access emerging talent.

Conclusion

The vision of an AI agent army systematically dismantling care gaps across the healthcare system is ambitious but achievable with current technology and favorable market conditions. The fundamental insight is that HEDIS improvement is not a single monolithic problem but rather a collection of seventy-two distinct challenges, each with specific data requirements, clinical workflows, and intervention strategies. By building specialized agents for each measure rather than trying to create a general purpose solution, the platform can achieve superhuman performance on the narrow tasks that actually matter for quality measurement.

The economics are compelling for all stakeholders. Health plans gain access to technology that can deliver measurable Star Ratings improvements worth hundreds of millions of dollars while paying only for demonstrated results. Physicians receive intelligent support that helps them provide better care without adding administrative burden. Patients benefit from more proactive outreach and fewer missed preventive services. The company captures a meaningful share of the value it creates while solving a real problem that the market has struggled to address effectively.

The technical capabilities required to build this platform exist today in ways they did not even three years ago. Large language models have reached a level of sophistication where they can understand complex clinical documentation, reason about appropriate interventions, and generate natural language communications that feel personal rather than robotic. Integration technologies have matured to the point where

connecting to disparate health IT systems, while still challenging, is a solved problem for well-capitalized companies with strong technical teams. The infrastructure for deploying and managing fleets of AI agents at scale has been built by cloud providers and is available as a service.

The timing is favorable because the pressure on health plans to improve quality performance continues to intensify. As Medicare Advantage enrollment grows and CMS tightens Star Ratings methodology, the stakes for quality improvement only increase. Meanwhile, the traditional approaches to HEDIS improvement are reaching diminishing returns. Health plans have already hired as many nurses as their budgets allow, implemented care management platforms across their organizations, and launched countless provider quality programs. Incremental improvement from these traditional approaches is becoming harder and more expensive. The market is ripe for a fundamentally different approach.

The company that successfully executes this vision will not just build a valuable business but will meaningfully improve healthcare delivery for millions of people. Better HEDIS performance is not just about regulatory compliance and financial bonuses. These measures exist because they represent evidence-based preventive and chronic disease management that actually improves health outcomes. Helping more diabetic patients achieve good blood sugar control prevents complications. Increasing cancer screening rates saves lives through early detection. Improving medication adherence reduces hospitalizations and emergency department visits. Our agent army is ultimately in service of helping people live healthier lives, which is a mission worth pursuing.

The path from concept to successful operating company is long and filled with challenges. Building the technology will require years of sustained engineering and iteration based on real-world feedback. Achieving product-market fit will demand deep customer engagement and willingness to adapt the solution to market needs. Scaling the business will test operational capabilities and require building an organization that can deliver consistent quality at increasing volumes. Navigating regulatory scrutiny and maintaining clinical credibility will require constant vigilance and investment in governance and oversight capabilities. None of this is easy, but

of it is possible for a team with the right combination of technical capability, healthcare expertise, and entrepreneurial determination.

The future of healthcare quality measurement will likely involve increasing automation and AI-driven intervention. The question is not whether AI agents will play a role in HEDIS improvement but rather which companies will successfully deploy these capabilities and capture the associated value. The window of opportunity is open now for a well-funded startup with strong founding team credentials to establish market leadership before incumbents wake up to the opportunity or well-capitalized competitors enter the space. For investors seeking exposure to the intersection of AI and healthcare with clear paths to revenue and compelling unit economics, this represents a rare opportunity to back a company addressing a multi-billion-dollar market pain point with technology that actually works. For entrepreneurs passionate about using AI to solve real problems in healthcare delivery, building this company would be both intellectually rewarding and potentially transformative for the industry. The HEDIS insurgency awaits its leaders.



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