



April 22, 2002

Marc P. Volavka Executive Director Pennsylvania Health Care Cost Containment Council 225 Market Street, Suite 400 Harrisburg, PA 17101

Dear Mr. Volavka:

First Priority Health (FPH) appreciates the opportunity to comment on the Pennsylvania Health Care Cost Containment Council's (PHC4) 2000 Managed Care Performance Report and to commend PHC4's efforts to provide the residents of Pennsylvania with relevant, comparable data on the performance of managed care plans in Pennsylvania.

FPH believes that a key component in continuing efforts to improve the quality of health care in Pennsylvania is an informed electorate. As an extension of the PHC4's stewardship role in promoting consumer education, FPH would ask the Council to encourage residents of Pennsylvania to also visit the National Committee for Quality Assurance's (NCQA) web site to review the report cards of Pennsylvania Managed Care Plans.

FPH has been collecting and reporting HEDIS® data to NCQA since 1994 as part of its corporate commitment to improve the quality of care and service to its members. As such, FPH has analyzed HEDIS data and other internal indicators on an annual basis in an effort to direct the activities of its Quality Improvement Programs. This data is subject to an internal review process that includes our network practitioners who assist FPH in identifying barriers to care and developing appropriate quality initiatives to address such barriers. Quality initiatives developed as a result of this process include efforts to improve Childhood and Adolescent Immunization Rates, Flu Vaccine Rates in the at-risk population, Diabetic Retinal Exam rates within the diabetic member population and Mammography and Cervical Cancer rates among women. In addition, FPH offers aggressive disease management programs for asthma, diabetes, coronary artery disease and prenatal care.

FPH is proud of its record in improving quality of care for our members and the overall community. These accomplishments include an Excellent Accreditation status awarded by NCQA for three consecutive years.

FPH fully supports the distribution of performance data in an effort to stimulate relevant dialogue and improve public reporting of meaningful performance data on health care in Pennsylvania. We look forward to continued collaboration with PHC4 in its public reporting initiatives.

Sincerely,

Carmella Sebastian, M.D.

Vice President, Medical Affairs and Chief Medical Officer

Blue Cross of Northeastern Pennsylvania