April 23, 2002

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

RE: Comment on PHC4's publication:

Measuring the Quality of Pennsylvania's Commercial

HMOs: Managed Care Performance Report

Dear Mr. Volavka:

UPMC Health Plan would like to submit the following comment for inclusion in the comment booklet that will be distributed along with the above-referenced public report.

UPMC Health Plan would again like to commend PHC4 for the tremendous effort it has made in preparing the Managed Care Performance Report for CY 2000. We feel that by taking data from already submitted reports, PHC4 has achieved four very important goals:

- ♦ It has created a reporting model that aims to effectively integrate various sources of information about managed care organizations. This approach avoids a "silo" approach to health care information across regulatory reports, accreditation measures and hospital data.
- ♦ It has not added yet another reporting mechanism to those that managed care organizations already must file. PHC4 has instead worked collaboratively with managed care organizations to review and analyze their reported data.
- ♦ Inpatient data from Pennsylvania acute care hospitals are being tied back to patients' managed care organizations. This approach views outcomes performance along a continuum from care through payor.
- ♦ It documents the positive results that managed care organizations can bring to their members and it provides Pennsylvanians with an important comparative analysis tool to become informed consumers.

As for the clinical outcomes data for UPMC Health Plan contained in this year's report, we would like to point out the following for several areas of our data:

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➤ Hospitalization for Diabetes

The higher than expected hospitalization rate for diabetes is not surprising. The Health Plan, through the Diabetes Subcommittee, identified opportunities for intervention with diabetics during calendar year 2000. Since that time, many initiatives, including a Diabetes Health Management program, have been developed by the subcommittee and implemented by the Health Plan. Every initiative is geared at ensuring members receive the appropriate treatment at the right time. Ensuring members receive these routine services is expected to result in improved outcomes for calendar year 2001 data.

Hysterectomy

While the rate of complications from abdominal hysterectomies is higher than expected, the Health Plan recognizes the importance of quality of care and investigates all potential issues. A detailed analysis of complications related to this procedure is being conducted to identify any patterns of care (physician trends, facility trends, etc.) that require intervention.

We once again wish to thank PHC4 for its collaborative and thoughtful approach in the production of this managed care report, as well as for the opportunity to submit comments on the report.

Sincerely,

Patricia A. Liebman

Chief Executive Officer

cc: Anne B. Docimo, M.D., Chief Medical Officer