



FIRST PRIORITY HEALTH

A Subsidiary of
BlueCross of Northeastern Pennsylvania
Independent Licensee of the Blue Cross and Blue Shield Association

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Pennsylvania

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February 25, 2005

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) 2005 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. We rely in part on NCQA Quality Compass for benchmarking our performance within the industry. However, we do feel that PHC4 could add additional value to the "Measuring the Quality of Pennsylvania's Commercial HMOs" by presenting trended information as well as traditional or PPO comparisons in all areas. The report displays might be more helpful to consumers by highlighting what would be considered statistically meaningful differences among plans. FPH believes that in showing the improvement of quality over time would paint a positive picture of managed care.

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, MD
Vice President and Chief Medical Officer
Blue Cross of Northeastern Pennsylvania

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