



BlueCross of Northeastern Pennsylvania

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19 North Main Street, Wilkes-Barre, Pennsylvania 18711-0302

March 4, 2008

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) upcoming *"Measuring the Quality of Pennsylvania's Commercial HMOs: A 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, quality and safety 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 as part of its corporate commitment to improve the quality of care and service to its members evaluates relevant data to identify opportunities to improve member outcomes. 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 and appreciate the additional benchmarking data provided by PHC4 to evaluate our performance against other health plans in the state. Trending of these indicators offers FPH another mechanism to identify opportunities for improvement.

Consistency in the display of information and highlighting what would be considered statistically significant differences could assist the consumer in a more meaningful evaluation of the information presented.

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,

Leo M. Hartz, M.D.
 Vice President Clinical Advocacy and Chief Medical Officer
 Blue Cross of Northeastern Pennsylvania

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