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Blue Cross and Blue Shield Association

March 3, 2008

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

Dear Mr. Volavka:

Thank you for providing Highmark with the opportunity to comment on the Pennsylvania Health Care Cost Containment Council's (PHC4's) report, *Measuring the Quality of Pennsylvania's Commercial HMOs: A Managed Care Performance Report* for the 2006 calendar year. Highmark is represented through the KeystoneBlue commercial HMO.

Highmark has placed great emphasis on continuous quality improvement. In particular, Highmark's efforts working with its network practitioners have resulted in improvement in pediatric and adolescent immunization rates, appropriate treatment of pharyngitis, high blood cholesterol management, asthma treatment, diabetes mellitus treatment, depression management, and provision of flu shots.

Highmark's commercial HMO product has been recognized by the *U.S. New & World Report* and the National Committee for Quality Assurance (NCQA) in their "America's Best Health Plans" for 2007. KeystoneBlue HMO ranked 22<sup>nd</sup> out of 253 plans on the list. The ranks are based on several factors such as clinical performance, member satisfaction and NCQA accreditation.

Although hysterectomy rates are higher than the state average, it is important to note that Highmark preauthorizes all hysterectomy requests using criteria consistent with recognized medical standards. Additionally, age demographics within the Keystone Health Plan West network reveal a generally older commercial population. It must also be noted that quality measurement standards for appropriate rates of hysterectomy have never been established.

Be assured that we have thoroughly reviewed the information in the 2006 report and paid particular attention to areas in which Highmark appears to have variations from the norm, both favorable and unfavorable. It is our goal to continue to assure that the best care available is provided to our members. All of the information provided in the PHC4 report is regularly reviewed with Highmark's Quality Improvement Committees that consist of internal staff and network physicians. Through the suggestions of these committees, initiatives are often developed focusing on improvements in care.

Highmark is pleased with the continued efforts that PHC4 has made in managed care reporting, as represented by this report. As always, we remain committed to assisting the PHC4 to ensure that the Council's reports are as accurate and useful as possible for all Pennsylvanians.

Sincerely,

A handwritten signature in black ink, appearing to read 'C. Vinson', with a stylized flourish at the end.

Carey Vinson, MD, MPM  
Vice President  
Highmark Quality and Medical Performance Management Department

C: Kenneth Melani, MD, CEO and President  
Donald Fischer, MD, MBA, Sr. Vice President and CMO  
Robert Callahan, Manager HCIRA