HIGHMARK.

August 7, 2000

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

Dear Mr. Volavka:

Highmark Blue Cross Blue Shield appreciates the opportunity to comment on the HC4's report, "Measuring the Quality of Pennsylvania's HMOs: A Managed Care Performance Report." Highmark is represented in the report with two lines of business: KeystoneBlue commercial HMO, and SelectBlue commercial POS. Together, these plans cover over 1 million members in Western Pennsylvania.

Highmark's goal is to help these members live longer, better lives. So, as part of our efforts, such as our disease management programs, Highmark works closely with our members and their doctors to reach treatment and lifestyle goals that are designed to improve their quality of life. These efforts are also designed to reduce the need for high-cost treatments or procedures that are necessary when these types of diseases are not diagnosed, treated and controlled early. Examples of these efforts include The Dr. Dean Ornish Program for Reversing Heart Disease, HealthPLACE programs, provider and member satisfaction surveys, and others.

Highmark concentrates on continuous quality improvement and is pleased with a number of performance measures included in this report. Based on the more current 1999 version of "Quality Compass" by the National Committee for Quality Assurance (NCQA), Highmark vastly exceeded national averages for "Effectiveness of Care Measures" concerning immunizations, screenings, other preventive measures, and more.

This HC4 report documents a number of steps that Highmark has taken to partner with its members and their doctors to improve the quality of their lives. Mailings to members, primary physicians, and specialists reminding them of the benefits of prevention are another example. Unfortunately, this report is just a snapshot of one year in an ongoing program. It cannot tell the whole story about Highmark's efforts. Highmark remains committed to working with its members to ensure that they receive the proper care at the proper time.

HC4's report demonstrates a number of positive performance measures for Highmark's commercial managed care programs. Other organizations have also recognized Highmark's outstanding performance. For example, NCQA is currently seen as "the gold standard" in measuring managed care plan

performance and Highmark's "commendable" accreditation by NCQA is a reflection of the plan's performance with its members. This national accrediting body reported that plans that consistently monitor and report on quality care and which have NCQA accreditation showed significant improvements in quality and outperformed those plans that do not. Highmark is pleased to be one of those well-performing plans.

Also, Highmark was successful in 1999 in retaining an "A+" rating from Standard & Poor's and an "A" rating from A.M.Best, two of the nation's leading financial rating agencies. These ratings confirm Highmark's strong consolidated balance sheet, superior capitalization, and excellent market position.

Highmark applauds the HC4 for the advances it has made in managed care reporting, as represented by this report. Further, Highmark plans to continue to support HC4's further reporting enhancements by pointing out areas for improvement. For example, while the report appropriately relies on largely existing sources of information, nonetheless there may be problems for readers trying to integrate results reflecting different sources of information and different timeframes. Also, some measures using hospital records appropriately attempt to adjust for the health risks of its members; unfortunately, others do not, which may explain several observations. In addition, the HC4 has done a good job in laying out the "Limitations of the Data;" readers should pay close attention to these cautions so as to use the report most effectively.

Highmark has participated in efforts to provide information and advice to the HC4 as it begins to develop reports on managed care. Highmark remains committed to assisting the HC4 to ensure that the Council's reports are as accurate and useful as possible for all Pennsylvanians.

Sincerely,

Executive Vice President

Government Business & Corporate Affairs