



FIRST PRIORITY HEALTH.

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

70 North Main Street

Wilkes-Barre

Pennsylvania

18711

June 13, 2001

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) 1999 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.

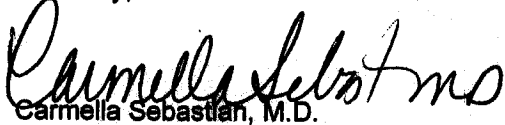
FPH has been collecting and reporting HEDIS® data to NCQA since 1994 as part of its corporate commitment to improve the quality of care and service to its members. As such, FPH has analyzed HEDIS data and other internal indicators on an annual basis in an effort to direct the activities of its Quality Improvement Programs. This data is subject to an internal review process that includes our network practitioners who assist FPH in identifying barriers to care and developing appropriate quality initiatives to address such barriers. Quality initiatives developed as a result of this process include efforts to improve Childhood and Adolescent Immunization Rates, Flu Vaccine Rates in the at-risk population, Diabetic Retinal Exam rates within the diabetic member population and Mammography and Cervical Cancer rates among women. In addition, FPH offers aggressive disease management programs for asthma, diabetes, coronary artery disease and prenatal care.

FPH is proud of its record in improving quality of care for our members and the overall community. These accomplishments include an Excellent Accreditation status awarded by NCQA for two consecutive years as well as awards for our quality programs from AAHP: first place in 1999 for the Flu Vaccine Initiative and third place for Childhood Immunization in 1999. The Flu Vaccine Initiative was selected by NCQA as one of 33 quality initiatives presented in its 2001 Quality Profile published by NCQA and Pfizer.

HEDIS® is a registered trademark of the National Committee for Quality Assurance (NCQA).

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,

A handwritten signature in cursive script, appearing to read "Carmella Sebastian".

Carmella Sebastian, M.D.

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