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Ms. Margaret E. O'Kane
President
NCQA
2000 L Street NW
Washington, DC 20036

Re: Public Comment on PPO HEDIS Technical Specifications

Dear Peggy:

The Pacific Business Group on Health continues to strongly support NCQA's performance measurement evolution designed to provide consumers and employers with information to help guide choice and distinguish value. It is our belief that the expansion of measurement and public reporting to encompass PPOs will be powerful mechanisms that will drive quality and efficiency improvements throughout the healthcare system. It is in this context that we appreciate this opportunity to comment on the proposed implementation of HEDIS measures for PPOs. We have three comments:

Broad Support for Application of HEDIS Measurement to PPOs: Overall, we believe that applying HEDIS measures in the PPO environment will go a long way to help close the gap in health plan performance measurement across all products and provide purchasers and consumers with the information needed to make better informed plan/product choices. We strongly support this direction.

Assure Regional Reporting: NCQA has long recognized that "health care is local" – HMOs AND PPOs are by their nature regional and therefore the HEDIS results reflect not only the efforts of the health plan but also those of the local delivery system(s) and/or contracted network of providers. While PPOs often have common administrative platforms, this local reality is still the case. The Technical Specifications are silent on this issue, but we wanted to affirm the importance to consumers and purchasers of making meaningful the PPO HEDIS measures by reflecting the potential for regional variations in care delivery, network design and selection, and health plan performance.

Significant Concern for Requiring Chart Review for Hybrid Measures: We are concerned about the feasibility of expecting that PPOs will be able to assure needed chart reviews called for in hybrid measures. In many cases, neither the health plans nor the individual physician offices have the resources to complete the volume of chart reviews that would be required. We recommend that where possible, specifications be revised to allow for use of G-Codes or CPT 2-Codes to meet the requirements of hybrid measures. Where this cannot be done, we believe it is likely better to eliminate measures requiring chart review rather than impose a burden that may limit PPOs participating in this important effort.

Thank you for this opportunity to provide input to NCQA's PPO HEDIS Technical Specifications.

Sincerely,

Peter V. Lee
Chief Executive Officer