



Mr. Joe Martin
Executive Director
Pennsylvania Health Care Cost Containment Council
225 Market Street
Suite 400
Harrisburg, PA 171001

RE: Collection of Laboratory Data for Purposes of Risk Adjustment of Health Care Outcomes

Dear Mr. Martin,

Jefferson Health System, which represents nine hospitals, welcomes this opportunity to comment on the Pennsylvania Health Care Cost Containment Council's (PHC4) published notice in the *Pennsylvania Bulletin* on the proposed requirements for changes in how hospitals report laboratory value data for use by PHC4 for purposes of risk adjustment.

It is critical that reports of hospital outcomes use a valid system to adjust for differences in patient severity of illness. The proposed use of laboratory data provides one means of achieving this end without undue burden to hospitals.

- The risk adjustment model the Council will use, along with tests of its impact, must be made public for consideration by the hospitals to assess its appropriateness.
- In order to validate the model and to understand the impact on outcome trends, the Council should provide a report of its performance compared to the prior adjustment using MediQual.
- With the implementation of the new system, it is critical that the Council verify the accuracy with which the data submitted has been processed and used in reports.
- The lab values to be collected and formats for providing data have not yet been specified. Hospitals need to know those specifications in order to assess the impact on what they need to provide.
- Lab data collection should be limited data needed for the current Hospital Performance Report.
- The Council has asked about the use of first versus worst lab value. The impact of these options needs to be tested.
- The Council needs to provide a specification that assure that identical data would result regardless of vendor selected or direct reporting by hospitals.
- One impact of this change is that hospitals will lose their investment in the MediQual Lab Parser. It would be desirable to provide a means for that tool to be adapted at the hospital's option to meet the new requirements.
- The means for submitting data for the period April 2010 through December 2010 remain unclear. Hospitals need to have those requirements specified very quickly.

Sincerely Yours,


Stanton N. Smullens, MD
Chief Medical Officer