



Second Floor  
4601 Baum Boulevard  
Pittsburgh, PA 15213  
412-802-6560  
Fax: 412-647-7854

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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**

The University of Pittsburgh Medical Center (UPMC) appreciates the opportunity to comment on the Pennsylvania Health Care Cost Containment Council's (PHC4) published notice in the *Pennsylvania Bulletin* on March 20, 2010, that would require hospitals to continue reporting laboratory value data for use by PHC4 for purposes of risk adjustment. We support the need for a risk adjusted methodology and agree that the laboratory data for purposes of risk adjustment has proven to be appropriate. In addition,

- UPMC requests that PHC4 continue to solicit additional public comment in the specification development. We have concerns that the new model developed by PHC4 may create some incomparable differences to the existing model. It is essential that hospitals fully understand the new methodology and can apply the methodology for concurrent use. It is also essential that the new methodology be well defined for consumer use. By continuing to solicit additional public comment, we would expect a better understanding of the process and avoidance of misinterpretation.
- UPMC supports the ability of a hospital to choose whether they will independently extract and transmit laboratory values to PHC4, or whether they will contract with a vendor for extraction and transmission. Whether self-submission or vendor-submission, we request that the PHC4 development process include a standardized format to submit and accept laboratory value data, along with a data verification process.
- UPMC supports PHC4 publishing data specifications during development so that hospitals can determine if they are technologically capable to collect and/or transmit data to PHC4, to determine if/how they can realign resources to meet the requirements, and to determine if they will require the assistance of a vendor. Each will require evaluation, planning and resources.
- UPMC requests that PHC4 also solicit additional public comment on timeframe expectations. This will assist hospitals in the evaluation of options along with technical and resource preparation to avoid the need to return to manual lab data abstraction.

Thank you for considering our comments. For questions, please contact Linda Harvey at 412-802-6890 or [harveys@upmc.edu](mailto:harveys@upmc.edu).

Respectfully,

*S/ Linda S. Harvey*

Linda S. Harvey  
Director, Center for Quality Improvement and Innovation  
UPMC