

April 16, 2010

Joseph Martin, Executive Director
Pennsylvania Health Care Cost Containment Council
225 Market Street
Suite 400
Harrisburg, PA 17001

RE: Collection of Laboratory Data for Response of Rate Adjustment of Health Care Outcomes

Dear Mr. Martin:

The Washington Hospital, 155 Wilson Avenue, Washington, PA, 15301, welcomes the opportunity to comment on the Pennsylvania Health Care Cost Containment Council's (PHC4) published notice that would require us to continue reporting laboratory value data for the use by PHC4 for the purpose of risk adjustment.

The Washington Hospital endorses the comments stated in the letter from the Hospital & Health System Association of Pennsylvania (HAP) representing over 225 member hospitals in the state. The letter coincides with The Washington Hospital's issues and comments; however, we would like to supplement HAP's comments.

Building Risk – Adjustment Models Using Laboratory Value Data

The Washington Hospital is concerned with the model of risk adjustment being independently developed by PHC4, thereby providing inconsistency with the nationally accepted models, such as MediQual. It is important we have transparency in how the model calculates the risk adjustment score to allow for internal verification, reporting, and comparison. The ability to cross-walk to national databases would be encouraged to allow benchmarking data beyond the state of Pennsylvania. However, PHC4 should use caution when publishing reports for public review and comments, if comparable reports are generated using mixed risk methodologies.

Data Specifications and Data Transmission

The Washington Hospital currently utilizes MediQual for other purposes beyond PHC4 reporting and intends to continue its relationship in order to maintain consistency in our reporting. Therefore, the release of the data specification needs to be done quickly in order for MediQual and other vendors to modify their systems in order to submit data within the required timeframe. Secondly, the Hospital does not support a single vendor being designated for laboratory data submission. PHC4 should endorse a standardized

format and transmission, but allow flexibility within each organization to submit the data in the most cost effective and appropriate method meeting the organization's business needs.

Laboratory Values

The Washington Hospital supports not changing the current lab value extraction method. Utilizing the current "worst value" data is a significant indication of severity of illness, minimizes internal processes changes and other third party products currently being utilized to extract data.

Cardiac Surgery

The Washington Hospital participates in the Society of Thoracic Surgery (STS) registry system. The Hospital has invested in resources to collect and report the required data and recommends PHC4 engage with both the hospitals and STS to leverage the current data collection efforts and not duplicate processes. The Council should consider using the lab value data and "present on admission" information for purposes of risk adjustment.

Summary

The Washington Hospital appreciates the opportunity to provide comments on the Council's approach. The Hospital also reminds the Council we are performing similar evaluations for the challenges that we face in meeting the HI-TECH meaningful use requirement proposed by CMS. These considerations should be applied to help reduce duplication or "re-do" processes in the near future for the Hospital and its business vendors.

Sincerely,



Gary B. Weinstein
Executive Vice President

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