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Sent: Friday, September 04, 2015 4:20 PM
To: WINKEL Karen J * DCBS; WOODS Gayle * DCBS
Cc: Aaron Bals
Subject: RE: SB 231

Thank you for the opportunity to provide comment on the proposed reporting. Overall, we feel the document appropriately reflects the requirements and intent of SB 231.

A few comments from Providence Health Plan:

- We support the use of APAC data for claims-based expenditures as we believe this will limit the burden on carriers and avoid duplicative reporting.
- We would like additional clarification on how hospitalist charges will be reflected in the reporting. We would like to have these charges segregated if possible.
- The document is helpful on a conceptual level, but we are concerned it lacks the detail necessary to ensure consistent reporting across carriers and other reporting entities. In particular, items 5 and 6 under “non claims-based primary care expenditures” are broadly defined and could be interpreted differently across reporting entity. We request an opportunity for payers to better define the specific requirements prior to data submission. Given the 12/31/2015 deadline, we would like this opportunity as soon as possible.
- Any additional information or clarification on how this information will be used by the state would be appreciated.

Thank you.

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