

Kaiser Permanente (Kaiser) appreciates the opportunity to respond to the Primary Care Expenditure Guidance for SB 231 (“the Guidance”) and looks forward to working with DCBS and OHA to ensure appropriate transparency through meaningful, accurate data reporting. Below are a few points for consideration as DCBS and OHA work to finalize these requirements.

Timeline

Kaiser is concerned that the December 31, 2015 deadline may be difficult to meet for many carriers, particularly as the data specs have not been finalized or published. Without a firm and final understanding of the data to be reported, it is difficult for any data provider to commit to a timeline. We recommend that a timeline be agreed to relative to the date final data specs are made available to carriers. Kaiser suggests that carriers be given at least six month from the date of spec finalization to report data to DCBS and OHA.

Data Breakdown

Kaiser is concerned that the specific cost metrics may not be available as defined in the Guidance. In order to ensure accurate and timely reporting, Kaiser would ask for an appropriate amount of flexibility to report aggregated total cost of care data that encompasses the specific payment types defined in the Guidance, rather than a breakout of each individual metric. Once the data specs are finalized and provided, Kaiser will work with DCBS and OHA to determine where such aggregation may be necessary.

Non-Claims Costs

As an integrated healthcare provider, Kaiser does not record each patient interaction as a “claim”, as done by most carriers. Kaiser’s data in the All-Payer All-Claims Database (APAC) is not directly comparable to fee for service carriers’ data nor is it representative of the total cost information for these patient encounters. Therefore it should not be used for additional analysis. The stated intent of SB 231 is to consider non-claims expenditure in total cost, resulting in the inclusion of data beyond the scope of the APAC. For Kaiser internal encounters (perhaps best considered as all non-claims expenditures), accuracy of the total cost amount can be best defined entirely outside of APAC data.

Sincerely,

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