



575 MARKET STREET, SUITE 600
SAN FRANCISCO, CA 94105
PBGH.ORG

OFFICE 415.281.8660
FACSIMILE 415.520.0927

March 25, 2016

Commissioner David Jones
c/o Kayte Fisher
Attorney III
California Department of Insurance
300 Capitol Mall, Suite 1600
Sacramento, CA 95814

Submitted Electronically via kayte.fisher@insurance.ca.gov

Dear Commissioner Jones:

As one of the nation's leading non-profit business coalitions focused on healthcare, the Pacific Business Group on Health (PBGH) works to improve healthcare quality and accountability while moderating costs. PBGH supports a marketplace of competing health plans and provider organizations held accountable for quality management and improvement, affordability and transparency of cost and quality information for consumers and purchasers.

We hope that CDI's continuing oversight of Anthem will support members' access to high quality healthcare services on a cost-effective basis, and ensure measurable quality outcomes. PBGH and its members have had a long collaboration with both Anthem and Cigna, including support of the California Quality Collaborative, engagement in the California Healthcare Performance Information System (CHPI) Patient Assessment Survey and participation in the IHA Pay for Performance program.

We are concerned that performance transparency and engagement in regional markets be maintained. As a part of the merger review process, we would encourage CDI to maintain expectations for Anthem and Cigna—or the merged entity—to participate in reporting initiatives such as provision of claims data to the statewide multi-payer claims database administered by CHPI. Additionally, health plan engagement of their contracted providers—hospitals, physician organizations, and individual providers—remains important. Examples include requiring contracted hospitals to report patient safety information to the Leapfrog Group and quality data to the California Maternal Quality Care Collaborative.

We hope that your regulatory review will support the maintainance of a competitive marketplace in California that hold plans accountable for quality and affordability. Furthermore, transparency of provider performance information is critical to supporting consumer choice of health plan options and access to high performing providers.

Sincerely,

David Lansky, PhD
President & CEO