



September 30, 2011

The Honorable Benjamin L. Cline
Chairman
The Joint Commission on Health Care
P.O. Box 1322
Richmond, VA 23218

Dear Mr. Chairman:

The Joint Commission on Health Care (JCHC) is currently examining the benefits of creating an All-Payer Claims Database (APCD) in Virginia. APCDs exist in several states and their outcomes have been positive. By bringing together stakeholders to work through the issues at stake, Virginia can also create an effective APCD that provides a valuable resource for health care quality improvement and controlling costs.

During the June JCHC meeting, several issues were raised regarding the legislation and ultimate implementation of the database. We wish to offer these suggestions to consider during your process:


- The APCD should have a clear focus on improving health care quality and controlling costs. This focus should drive all data-collection and reporting efforts.
- VHI is an ideal location to house an APCD. In particular, its governing board is already comprised of key stakeholders: consumers, business, provider, payer, and Commonwealth. This board has significant experience dealing with the issues affecting the use and reporting of health care data. An APCD would be a natural extension of their current mission.
- VHI should be able to raise the capital necessary to create and maintain an APCD without any additional state appropriation. Other states have combined voluntary data subscriptions with federal, state and private grant funding in order to sustain their efforts.
- In order to ensure that a meaningful data set can be created, claim submission by all payers must be mandated by the General Assembly. Patients utilize health care in a variety of settings and pay for it in vastly different ways. Without the claims of all payers for all services, significant information gaps will emerge and render the data meaningless.
- How the data is used and reported is the most important question whose answer will likely change over time. The General Assembly should establish broad, but well-defined data use parameters that will create a framework within which the governing board of VHI can make the ultimate data-use decisions. This will allow the board flexibility in its decision-making while still providing adequate accountability to the General Assembly.



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It is our desire to see the JCHC recommend the creation of an APCD to the General Assembly. Virginia's health care system has come as far as it can without accessible, broad-spectrum data. If we fail to create an APCD, it will send the message that we do not need to improve our quality or control our costs. Since this is clearly not the case, the General Assembly must create an APCD so that all stakeholders can begin to make more-informed decisions that improve quality and control cost.

Sincerely,



Christopher S. Bailey
Senior Vice President

xc: Members - Joint Commission on Health Care