



Comments and Questions on the Center for Health Information and Analysis (CHIA) Cost Data Methodology September 25, 2017

Sec 1: Overview of CHIA and APCD Data

- The Massachusetts Medical Society (MMS) appreciates the opportunity to provide comments and questions on the cost data methodology for **Massachusetts Compare Care**, the statewide cost and quality website, mandated under chapter 224. MMS submits these comments and questions for discussion during the webinar scheduled for September 26, 2017 at 6 pm.
- MMS supports transparency in health care including reliable, timely and accurate cost (price) and quality transparency. MMS supports the Center for Health Information and Analysis (CHIA) vision for a “transparent health care system where reliable information provides common ground to make informed decisions”. MMS has worked with CHIA staff to provide input into the roll out of the **Massachusetts Compare Care** website including meetings with key committees and the Officers for input, coordinating specialty society input to decisions aids, and encouraging adequate time frames for review and input on the decision aids and beta testing.

Sec 2: Overview of Methodology

- The **Massachusetts Compare Care** website will compare historical provider specific cost estimates based on the MA APCD Release 5.0 Medical Claims data for select outpatient health care services either by payer or through a consolidated all payer cost estimate option. According to the methodology, health care service cost estimates were derived using MA APCD commercial, fee for service, medical claims for Massachusetts residents and non-residents from the following payers; Blue Cross Blue Shield of Massachusetts, Boston Medical Center Health Net Plan, Fallon, Harvard Pilgrim Health Care, Health New England, Neighborhood Health Plan, Tufts, and Tufts Public Plans with dates of service incurred during July 2014 through December 31, 2015 and paid through March 2016. MMS encourages CHIA to specify the limitations of the APCD data on the website, where appropriate.
- The **Massachusetts Compare Care** site will provide 2-3-year-old data for its cost estimates to the public. Patients looking to estimate their costs in 2017 and 2018 will not have timely data to make current decisions. There is concern that this will mislead patients attempting to estimate current costs of care. Patients will need to be cautioned about using these historical figures to project current costs. MMS strongly suggests that disclaimers in this regard need to be consistently made and clarifying language needs to be added to explain that these older data do not reflect the actual cost of care today. Instead, MMS encourages CHIA to advise patients to speak with their health insurance plan to anticipate their personal costs including deductible, coinsurance, copay and paid amounts for said procedures and visits.
- Further, CHIA states it will use “typical, non-complicated encounters for services rendered by each provider”. Again, this distinction of a typical, non-complicated encounter” is not obvious to the patient seeking care. The website needs disclaimers to caution patients when extrapolating costs of care to their case, as the patient may not realize their case is more complicated than these data propose. Disclaimers to this effect must also be provided. MMS would appreciate learning how CHIA plans to phrase these disclaimers during the webinar.

Section 3: Data Specifications Services

Services

- CHIA notes that “for some services, restrictions were placed on procedure code modifiers in order to exclude outlier service encounters (e.g. increased procedural services related maternity). MMS would appreciate more details of these type of service restrictions on the webinar on the September 26th.

Service Encounters

- In this section, CHIA provides the calculation of the “allowed amount” cost estimate for the service encounters stated as the “allowed amount” is equal to specific category amounts (paid, withhold, copayment, coinsurance, and deductible). MMS suggests CHIA provide a definition section on the website as well as clarifying disclaimer sections to help patients as well as hospitals, ambulatory care centers and physicians understand this and other aspects of the site.
- CHIA indicates that “where services included, for example, add on components or comprised separate services, technical and professional components were bundled into a single service encounter and associated with the primary service provider” MMS is concerned that this bundled payment will slightly inflate the costs and further mislead patients who ultimately receive separate bills for said procedure. This requires CHIA to be very clear about the cost estimate in this regard and to explain the possible billing experience patients may have with these and other type of similar services so that they are not surprised by warranted claims that have been bundled for the website purposes.
- MMS would appreciate CHIA clarifying the intent of the last paragraph of this section and especially the last three lines of the paragraph as there is great confusion about what is being attempted and what data will be provided. Instead of inferring, we seek clarification on that section. We look forward to learning more on the webinar.

Cost estimates

- In regards to CHIA’s established thresholds criteria defined as “fifteen or more service encounters and 25th percentile for those service encounters had to be at least \$1”. During the webinar could you please clarify if this threshold criteria is per payer? And then across payers?

Providers

- The **Massachusetts Compare Care** website is for Massachusetts. What is the reason for including out of state providers? How is their data being presented? Is it rolled into Massachusetts provider data or will it appear separate and distinct and why?
- CHIA has developed criteria to synthesize cost estimates to one site for those providers who typically provide care in multiple sites, for the benefit of the patient. By doing this, MMS raises the concern that patients may not find their typical site of service on the website and become confused by the lack of site detail. MMS suggest an appropriate disclaimer in this regard.

Claims data sourcing

- CHIA is using data sourced from MA APCD Release 5.0 using medical claims with service (incurred) dates of July 2014 through June 30, 2015 paid through March 2016. MMS recognizes this is the current data available at this time, however, MMS also remains concerned that this old data is the basis for patient’s costs estimates today. Patients should be encouraged to contact their health plans for their personal up-to-date cost estimates incorporating their personal deductible and coinsurance amounts.
- Bullet two in this listing – During the webinar, please explain the rationale for CHIA to include primary medical claims in the cost estimates and to eliminate secondary payers and how this effort impacts on the estimate of costs?
- Bullet three- During the webinar, please explain how capitated providers will be identified on the website since it appears from this bullet that primarily fee-for service claim lines were sought. Please also clarify

how confident CHIA is in the fee-for-service data capture based on the statement that “Within the APCD Release 5.0 Medical Claims data, fee-for-service claims lines were defined as those not under capitation, and identified by Capitated Encounter Flag-2.

Section 4: Payer specific cleaning and adjustments to methodology

- In this section, CHIA notes specific adaptations to the payer specific logic regarding the data specifications. MMS appreciates the transparency here, notes the apparent difficulty of using APCD data and claims data, in general and expects there will be disclaimers here as well.

MMS appreciated the opportunity to provide these comments and questions in advance of the webinar scheduled for Tuesday, September 26 and looks forward to learning CHIA’s responses at that time.