

Members of the Senate Finance Committee,

BlueCross BlueShield of Vermont is in the process of implementing a new price and quality tool for our members. The new tool will satisfy the requirements outlined in Section 12 of S.135 (Draft No. 4.6) and will integrate real-time price and quality information. BCBSVT strongly supports Vermonter's having information that is specific to their plan and current status in order to make well informed treatment decisions. That said, we are requesting consideration of the following changes to the proposed language.

BlueCross BlueShield of Vermont requests:

1. That the language in Section 12 of S.135 (Draft No. 4.6) "as well as comparing quality across providers" be changed to and include provider quality information as available and consistent with other applicable laws and regulations.

Basic Explanation- We do not have the population to report on many measures. That is based on reporting guidelines used nationally (at least 30 people in a measure) and aligns with DFR guidance developed with feedback from the payers and the medical society. Per DFR guidance, we report at the practice level and even then, as the largest commercial insurer in VT, we only have reportable measures for 20% of the primary care providers (252 out of 1297). Therefore, language that requires comparison between individual practitioners, or creates such an expectation, would not be advisable.

2. The effective date for Section 12 of S.135 (Draft No. 4.6) be July 1, 2016.

Basic Explanation- The project is underway and we are confident the tool will be in place by this time.

Thank you for your consideration,

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