

May 18, 2015

Carlos Beruff
Chair, Commission on Healthcare and Hospital Funding
c/o Agency for Health Care Administration
2727 Mahan Drive
Tallahassee, FL 32308

Dear Mr. Beruff:

The Florida Hospital Association, on behalf of our more than 200 hospital and health system members, welcomes the opportunity to respond to the request for quality and financial data.

Florida hospitals have a long-established partnership with the State of Florida to provide an extensive amount of patient, quality, financial and operational data. Florida hospitals have worked closely with the Agency for Health Care Administration (AHCA) for decades to ensure public access to a variety of data so Floridians are able to make informed health care choices in partnership with their doctor. In fact, nearly 90 percent of the data requested in the enclosed survey has already been submitted in a uniform and consistent manner to AHCA and posted on FloridaHealthFinder.gov.

Upon reviewing some of the new data fields requested, we noticed terms that are vague and open to differing interpretations. Due to this ambiguity and lack of instruction, if completed, the information could be based on different definitions and not suitable for valid comparisons. Clear direction is critical to ensure complex information is accurately reported. For example, the instruction manual for just one of the existing AHCA financial reports is nearly 90 pages due to the extent of the subject matter. Thus, it seems logical for the Commission to use the data that have already been reported based on current rules and definitions.

In addition, some of the rate information requested is confidential through current state statute or contracts with private payers. Both hospitals and private insurers treat managed care rates as proprietary information and public reporting would be anticompetitive.

To achieve an accurate picture of Florida hospitals' financial status, it is also important to note the following:

- Florida hospitals contribute nearly 80 percent of the State's share of Medicaid funding for hospital services. This contribution – approximately \$1.3 billion annually – is generated from a provider tax, intergovernmental transfers and certified public expenditures.

Letter to Carlos Beruff
May 18, 2015
Page Two

- In 2013, Florida hospitals provided over \$3.5 billion in community benefits that go far beyond direct patient care. This includes programs to promote healthy lifestyles and preventative care to build healthier communities and families.

Attached is our survey response that outlines exactly where the Commission can locate most of the requested data elements. Our hospitals agree that all Florida families – those who are fortunate enough to have health insurance and those who do not – should have access to affordable and effective health care. Florida hospitals stand ready to work with the Governor and Legislature to address issues critical to our state's health care system.

Sincerely,

A handwritten signature in blue ink, appearing to read "William A. Bell". The signature is fluid and cursive, with the first name "William" and last name "Bell" clearly distinguishable.

William A. Bell
General Counsel

Enclosure