



The Colorado Health Foundation™

June 12, 2015

Sue Birch  
Executive Director  
Colorado Department of Health Care Policy and Financing  
1570 Grant Street  
Denver, CO 80203-1818

Dear Director Birch,

The Colorado Health Foundation supports the proposed All Payer Claims Database (APCD) rule change that would expand the database to include self-insured plans. Self-insured claims are a growing proportion of Colorado's insured lives representing approximately 27 percent of the state's insured population. Adding this substantial segment of the market to the APCD will allow for a more comprehensive understanding of Colorado's health care landscape and will help stakeholders and policy makers monitor change and identify opportunities for reform.

The Colorado Health Foundation is a non-profit organization guided by a vision of making Colorado the healthiest state in the nation together with partners from the public and private sectors. We engage in grantmaking, public policy, evaluation, private sector initiatives and communications outreach to ensure a future state where Colorado's communities promote health and its health care systems deliver excellent, affordable care to Coloradans who both have and desire good health.

The Foundation recently approved a 10-year commitment to support delivery system and payment reform efforts in Colorado through a collective impact initiative designed to achieve the Triple Aim of better population health, improved patient experience of health care and lower per capita costs. This initiative, now named Better Care, Better Costs, Better Colorado (BC3), is underway. A framework has been developed to approach the complex task of achieving the Triple Aim, including an emphasis on data transparency and reporting. A comprehensive APCD is critical to achieving the collective's goals in this area. The addition of self-insured claims to the APCD will provide a better understanding of variation in utilization and cost trends. Including these data also will help consumers shop for the highest value care through the public website. These combined benefits ultimately will help drive the market in Colorado towards more affordable, effective health care.

The proposed rule to expand the APCD to the self-insured population is an important next step to developing a better understanding of health care cost and improving policy. We applaud and support the efforts HCPF has undertaken to enhance this important resource. Please do not hesitate to contact Dustin Moyer, policy officer at the Colorado Health Foundation, at [dmoyer@coloradohealth.org](mailto:dmoyer@coloradohealth.org) or 303.953.3600 with any questions regarding our position on this issue.

Thank you for the opportunity to provide input on this development for the State of Colorado.

Sincerely,

Rahn Porter  
Interim President and CEO  
The Colorado Health Foundation