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Bybee, Cressinda

From: Chronister, Ronald <ronald.chronister@bipc.com>
Sent: Wednesday, December 03, 2014 1:48 PM
To: Bybee, Cressinda
Subject: Response to Public Comment from Case S. Phillips, DC
Attachments: HBG1_GENERAL-1898554-v1-Response to Public Comment from Case Phillips.DOC

Ms. Bybee,

Attached please find Highmark Inc.'s response to the public comment received by the Pennsylvania Insurance Department from Case S. Phillips, DC. I am providing Dr. Phillips with a copy of the response by separate letter.

Ron Chronister

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**BEFORE THE INSURANCE DEPARTMENT
OF THE
COMMONWEALTH OF PENNSYLVANIA**

Statement Regarding the Acquisition of Control of or Merger with Domestic Insurers:

Hospital Service Association of Northeastern Pennsylvania
d/b/a Blue Cross of Northeastern Pennsylvania;
First Priority Life Insurance Company, Inc.;
HMO of Northeastern Pennsylvania, Inc. d/b/a First Priority Health

By

Highmark Inc., a Pennsylvania nonprofit corporation

**Response of Highmark Inc. to
Comments of Case S. Phillips, DC, Dated October 28, 2014**

Highmark Inc. is responding to the comment from Case S. Phillips, DC, received by the Pennsylvania Insurance Department on October 31, 2014. The comment is numbered as Document 0790 on the Highmark/ BCNEPA Cumulative Log page of the Pennsylvania Insurance Department website.

Dr. Phillips is the President of the Pennsylvania Chiropractors Association and has offered comments on the proposed merger of Highmark and Blue Cross of Northeastern Pennsylvania (BCNEPA) opposing of the merger based upon his belief that the proposed merger would negatively impact patients and providers.

Highmark Inc. disagrees with the comments. Highmark understands, supports, respects and encourages the doctor/patient relationship. It is not Highmark's desire to interfere with that relationship. However, Highmark as a healthcare partner, owes a duty to its groups and its customers and subscribers to ensure that each customer or subscriber receives the most safe, effective, highest quality care, in the right setting, at the right time, in the right amounts, and by the right provider. Highmark works diligently to ensure that high quality care is delivered in the most cost effective manner. Every dollar that our customers or subscribers or groups spend on healthcare is one less dollar that they have to spend towards other important items in their lives.

Highmark values its relationships with its provider communities. Highmark consistently seeks out advice and opinions from the medical community before implementing new medical policies or initiating new programs. Before Highmark launched the Physical Medicine Management Program (PMMP), Highmark met with the various provider associations to explain the program and to seek input. Also, an Advisory Committee was established to monitor the program. A member of the Pennsylvania Chiropractors Association sits on that Advisory Committee today. As such,

Highmark is consistently seeking ways to partner with the provider community. Both Highmark and the provider have the best interests of the customer/subscriber in mind.

Highmark's mission is not to limit effective medically necessary care. Highmark's goal is to deliver benefits according to the customers' or subscribers' benefits and to ensure that their benefits are maximized. When benefits are used for medically unnecessary purposes, the health of the customer or subscriber may be jeopardized and, when future benefits are needed, they may not be available if they have been unnecessarily consumed during the benefit period. Highmark works diligently every day to eliminate redundancies, waste and cost prohibitive therapies, unnecessary treatments, etc. without regard to provider specialty or type and category of procedure.

Highmark Inc. would like to thank Dr. Phillips for his comments.

Highmark Inc.
120 Fifth Avenue
Pittsburgh, PA 15222

DATE: December 3, 2014

cc: Case S. Phillips, DC