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Bybee, Cressinda

From: Linda Kaufmann <Lkaufmann@haponline.org>
Sent: Monday, February 02, 2015 12:01 PM
To: Bybee, Cressinda
Cc: Paula Bussard
Subject: Comment Letter - Proposed Acquisition
Attachments: Comment letter to Pennsylvania Insurance Department.pdf

The attached letter is being sent pursuant to the Insurance Department's public comment period for the Highmark, Inc. acquisition of Blue Cross of Northeastern Pennsylvania.

Receipt confirmation is requested.

Have a great day!

Linda L. Kaufmann
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Health Economics and Policy
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THE HOSPITAL & HEALTHSYSTEM
ASSOCIATION OF PENNSYLVANIA



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THE HOSPITAL & HEALTHSYSTEM ASSOCIATION OF PENNSYLVANIA

February 2, 2015

Ms. Cressinda Bybee
Senior Insurance Company Licensing Specialist
Pennsylvania Insurance Department
Bureau of Company Licensing and Financial Analysis
1345 Strawberry Square
Harrisburg, PA 17120

Dear Ms. Bybee,

The Hospital & Healthsystem Association of Pennsylvania (HAP) represents nearly 240 member institutions, including 68 stand-alone hospitals and 138 hospitals that are part of 29 health systems across the state. HAP appreciates the opportunity to provide the following comments regarding the acquisition of Blue Cross of Northeastern Pennsylvania by Highmark, Inc.

HAP appreciates the Insurance Department's review of the proposed acquisition and the process that it has used to provide information to the public and to seek public comment. HAP has shared information about the proposal with its members. In addition, both plans met with HAP and they met separately with many hospital and health system leaders in northeastern and north central Pennsylvania to make sure that the hospital community understood the proposal, its goals, and the implications for serving patients in the Blue Cross of Northeastern Pennsylvania service area.

There are several items addressed in the Form A filing that the hospital community served by Blue Cross of Northeastern Pennsylvania believes are important to be sustained in the Insurance Department's final review and approval. These include:

- Clear statements regarding the financial support for the social commitment to improve health in communities in the existing Blue Cross of Northeastern Pennsylvania service area. The resources of Blue Cross of Northeastern Pennsylvania were derived from that service area and it is appropriate to sustain focused and reasonable support to community-based programs in that service area.
- The commitment to continue innovative health care insurance products and services in the Blue Cross of Northeastern Pennsylvania service area. The provision of health care is local and a commitment to work with employers and with the continuum of health care providers in innovative ways to meet health care needs will foster delivery system transformation and improved value.

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- Sustaining a regional presence to serve subscribers (both individuals and employed groups) and to support health care providers in serving those subscribers will help foster innovative and effective approaches to addressing the provisions of cost-effective, affordable health coverage and meeting subscriber care needs.
- Cooperating with the Commonwealth Medical College, which has established a medical education program in Scranton to support needed education for physicians in the region and state.

Again, HAP appreciates the opportunity to comment about this proposal. Feel free to contact me at (717) 561-5344, if you have any questions regarding the above comments.

Sincerely,

Paula A. Bussard
Chief Strategy Officer