



December 12, 2023

Kim Sheaffe  
Pennsylvania Insurance Department  
1326 Strawberry Square  
Harrisburg, PA 17120  
Email: kimsheaffe@pa.gov

**Re: High Modification Request – Comment Deadline Extension**

Dear Ms. Sheaffe:

Independence Blue Cross (IBX) appreciates the opportunity to comment on Highmark, Inc.'s (Highmark) request for modification of the Insurance Department's Approving Determination and Order presented in the Department's Notice 2023-17. However, as one of many invested stakeholders, IBX wishes to formally request an extension for the comment deadline from January 16, 2024, to **February 16, 2024**.

The public did not receive notice of Highmark's request until early December, and due to the busy nature of the holiday season, IBX would appreciate the opportunity for additional time to conduct a thorough and meaningful review of the extensive Order and requirements. IBX believes that additional time would enable our organization to provide more comprehensive and thoughtful feedback on Highmark's request to be released from the complex conditions dating back over a decade. An extension would not only benefit our organization but would also enhance the overall quality of feedback received from the public and will contribute to a more robust public engagement process.

If you require any additional information or documentation to process this request, please do not hesitate to contact me at [Julie.Bogorad@ibx.com](mailto:Julie.Bogorad@ibx.com)

Thank you for your time and consideration.

Sincerely,

A handwritten signature in black ink that reads "Julie Bogorad".

Julie Bogorad  
Director, Office of Public Policy  
Independence Blue Cross