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Sent: Friday, December 15, 2023 1:46 PM

To: Sheaffer, Kimberly <kimsheaffe@pa.gov>

Cc: Noah Karn <nkarn@ifpenn.org>; Tim Knapp <tknapp@ifpenn.org>

Subject: [External] Highmark's Request for Modification - our request for an extension of the public comment period

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Kim:

We respectfully ask the Insurance Department to extend the public comment period on the above captioned matter beyond the proposed date of January 16.

There are several reasons for this:

- End of year business obligations combined with the holiday season will prevent us and our health insurer members from giving this matter the attention it deserves under the current timeframe.
- The current order Highmark is seeking to modify dates from 2013 – now nearly eleven years ago. Because of that, we don't think extending the public comment period for an additional period of time should have a material impact on Highmark, AHN, or the Insurance Department itself.
- Most importantly, Highmark's request centers on the findings of a Compass Lexicon report on the western PA healthcare and health insurance markets. We have asked for a copy of that report and have not yet received it. And while we understand the Department is waiting for a redacted version back from Highmark that will be shared with us and others, that has yet to occur. The absence of the report undermines our ability to provide a fully informed and complete response to Highmark's request. As such, we believe the public comment period should not end until four weeks have elapsed from the date of our receipt of the Compass Lexicon report.

Given the time constraints we find ourselves in, we also ask for a response to this request by December 29, 2023.

Thank you in advance for your consideration of this request. Please do not hesitate to call with any questions or comments.

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