BEFORE THE INSURANCE DEPARTMENT OF THE COMMONWEALTH OF PENNSYLVANIA

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

Highmark Inc., First Priority Life Insurance Company; Inc.; Gateway Health Plan, Inc.; Highmark Casualty Insurance Company, Highmark Senior Resources Inc.; HM Casualty Insurance Company, HM Health Insurance Company, d/b/a Highmark Health Insurance Company; HM Life Insurance Company, HMO of Northeastern Pennsylvania, Inc., d/b/a First Priority Health, Inter-County Health Plan, Inc.; Inter-County Hospitalization Plan, Inc., Keystone Health Plan West, Inc.; United Concordia Companies, Inc.; United Concordia Dental Plans of Pennsylvania, Inc.; United Concordia Life and Health Insurance Company

By UPE, a Pennsylvania nonprofit corporation

SUPPLEMENTAL RESPONSE TO PID INFORMATION REQUEST 4.3.18 FROM THE PENNSYLVANIA INSURANCE DEPARTMENT

REQUEST 4.3.18:

Identify and provide a summary and the status of each matter, if any, in which any Highmark and WPAHS Entity is the subject of any investigation or legal action that could result in debarment, suspension, license or permit revocation by any governmental agency; the imposition of a civil monetary penalty; or in the imposition of any criminal penalty.

RESPONSE:

The WPAHS Entities are subject to numerous laws and regulations of federal, state and local governments. Compliance with these laws and regulations can be subject to governmental review and interpretation as well as regulatory actions unknown or unasserted. There is heightened governmental activity, including investigations and allegations, concerning possible violations by health care providers of regulations that could result in the imposition of repayment obligations, fines and penalties. The WPAHS Entities are routinely subject to such regulatory action in the course of their operations, and while such reviews may result in repayments and other remedies that could have a material effect on the financial results of the WPAHS Entities in a given period, management is not aware of any repayments or other remedies that would have a material effect on the financial position of the WPAHS Entities See <u>Attachment 4.3.19</u>.

West Penn Allegheny Health System 30 Isabella St., Suite 300