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Bybee, Cressinda

From: Chronister, Ronald [ronald.chronister@bipc.com]
Sent: Wednesday, April 24, 2013 11:19 AM
To: Bybee, Cressinda
Cc: krugh@co.westmoreland.pa.us
Subject: Response to Public Comment from County Commissioner R. Tyler Courtney
Attachments: ScannedFile.pdf

Ms. Bybee,

Attached please find UPE's response to the public comment received by the Insurance Department from County Commissioner Courtney. I am providing Mr. Courtney with a copy of the response with this email.

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:

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

**Response of UPE to
Comment of Westmoreland County Commissioner Tyler Courtney
Dated April 19, 2013**

UPE is responding to the comment from Westmoreland County Commissioner Tyler Courtney received by the Pennsylvania Insurance Department ("Department") on April 19, 2013. The comment is numbered as Document 1377 on the Highmark/West Penn Cumulative Log page of the Department website.

Fearing that the resulting integrated delivery network ("IDN") would adversely affect community health care resources, such as Excelsa Health Care System, Commissioner Courtney has expressed concern for the proposed affiliation of Highmark Inc. ("Highmark") and West Penn Allegheny Health System, Inc. ("WPAHS").

UPE, Highmark and the IDN physicians and hospitals are dedicated to delivering evidence-based health care services in convenient community-based settings in more efficient ways. For these reasons, the UPE intends to work collaboratively with community hospitals to help keep care in the community where possible.

During the past few years, a significant volume of health care services that could have been provided in the community hospital setting has been unnecessarily diverted to higher-cost settings. Because of its size, reach, and the significant volume of care it controls, UPMC has been driving care from community to urban-based settings as a means to generate greater revenue for its health system. This migration inconveniences patients, increases the region's health care costs and undermines the viability of community hospitals.

UPE will seek to stem this migration through its efforts to collaborate with community hospitals as it believes that it is essential to help keep care in the community, where appropriate, and preserve these important local economic assets.

UPE would like to thank Commissioner Courtney for his comments.

UPE

120 Fifth Avenue
Pittsburgh, PA 15222

DATE: April 24, 2013

cc: Commissioner Tyler Courtney, Westmoreland County