



A Leader in Healthcare Insurance

May 13, 2009

Mr. Stephen J. Johnson, CPA
Deputy Insurance Commissioner
Pennsylvania Insurance Department
Office of Corporate and Financial Regulation
1345 Strawberry Square
Harrisburg, PA 17120

Re: Inter-County Health Plan Inc.
Inter-County Hospitalization Plan Inc.
Act 62: Community Health Reinvestment Activities

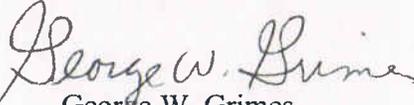
Dear Mr. Johnson:

This letter is in response to your correspondence dated May 5, 2009 concerning the Community Health Reinvestment Activity reporting requirement established under Act 62 of 2008 as it relates to Inter-County Health Plan Inc. and Inter-County Hospitalization Plan Inc. (the "Inter-County Plans").

As you know, Highmark Inc. ("Highmark") and Independence Blue Cross ("IBC") jointly control the Inter-County Plans. Consistent with prior practice and the Community Health Reinvestment Agreement reached between the companies and the Department, Highmark and IBC included the applicable proposed Community Health Reinvestment expenditures for the Inter-County Plans in their respective "Plan Proposals for Community Health Reinvestment Activities" submitted to the Department in March.

Enclosed is a Plan Proposal for Community Health Reinvestment Activities for the Inter-County Plans reflecting this practice.

Sincerely


George W. Grimes
Chief Operating Officer
Chief Financial Officer

**PLAN PROPOSAL FOR
COMMUNITY HEALTH REINVESTMENT (CHR) ACTIVITIES**

Proposal for Year 2009-2010

FEIN: 2 3 [REDACTED] 2 0 6 3 8 1 0

NAIC: 5 3 2 5 2

I. HOSPITAL PLAN CORPORATION OR PROFESSIONAL HEALTH SERVICE PLAN CORPORATION NAME AND ADDRESS:

Inter County Health Plan, Inc.
720 Blair Mill Road
Horsham, PA 19044

II. PLANNED EXPENDITURES:

	Projected Expenditures
1. Proposed annual CHR for health care coverage for persons unable to pay for coverage (list and describe proposed endeavors below):	See the filings of Highmark Inc. and Independence Blue Cross
2. Proposed annual CHR for health care services for persons uninsured and unable to pay for services (list and describe proposed endeavors below):	See the Filings of Highmark Inc and Independence Blue Cross
3. Proposed annual CHR for programs for prevention and treatment of disease or injury or the promotion of health or wellness (list and describe proposed endeavors below):	See the Filings of Highmark Inc and Independence Blue Cross
4. Proposed other annual CHR activities (list and describe proposed endeavors below):	See the Filings of Highmark Inc and Independence Blue Cross
5. Proposed other CHR activities pursuant to the Agreement dated February 5, 2005 and published at 35.Pa.B. 4155 or any successor or other agreements (list and describe proposed endeavors below):	See the Filings of Highmark Inc and Independence Blue Cross
TOTALS	

**PLAN PROPOSAL FOR
COMMUNITY HEALTH REINVESTMENT (CHR) ACTIVITIES**

Proposal for Year 2009-2010

FEIN: 2 3 [redacted] 0 7 2 4 4 2 7

NAIC: 5 4 7 6 3

I. HOSPITAL PLAN CORPORATION OR PROFESSIONAL HEALTH SERVICE PLAN CORPORATION NAME AND ADDRESS:

Inter County Hospitalization Plan, Inc.
720 Blair Mill Road
Horsham, PA 19044

II. PLANNED EXPENDITURES:

	Projected Expenditures
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