



# PENNSYLVANIA CHIROPRACTIC ASSOCIATION

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October 28, 2014

Pennsylvania Insurance Department  
Commissioner Michael Consedine  
1326 Strawberry Square  
Harrisburg, PA 17120

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Commissioner's Office

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Insurance Department

Commissioner Consedine:

Thank you for the opportunity to comment on the PID's request for input on the proposed merger of Blue Cross of North East PA (BCNEPA) into Highmark. As you know, the PCA, the Commonwealth's largest association representing the interests of Pennsylvania's 4,000+ Doctors of Chiropractic, has had numerous experiences dealing with Highmark through the PID in the past 2 years, especially as regards Highmark's faltering efforts with their Physical Medicine Management Program (PMMP) and more recently, the continuation of imposing multiple co-pays on patients during a single office visit.

Given our mutual experiences with Highmark, the PCA is offering for the record, our serious concerns about the BCNEPA merger into Highmark. Our concerns are three-fold:

1. The potential for even more aggressive monopolistic activities on the part of Highmark than seen in western Pennsylvania in the past year. PCA is concerned that Highmark will continue its efforts to seize more control of the health insurance market in Pennsylvania, as well as to continue its blatant shareholder-responsive efforts to interfere in the patient- doctor relationship, essentially now becoming a health care "provider," at least in the context of determining medical necessity and related issues.
2. Highmark has been a consistently unwilling partner to work with health care professionals, instead preferring to dominate by policy fiat and encouraging confusion between the company and providers in what seems to be constantly shifting policies, all of which accrue benefits to the Highmark corporation and share-holders, with patients and providers a distant second or third in their priorities. In short, Highmark has consistently acted in bad faith when it comes to genuine partnering with health professionals and their respective associations.
3. Highmark's much decried PMMP and the provider-patient policies and services resulting from this poorly conceived and implemented cost-containment/ denial of care program, raise significant concerns that Highmark patients in need of physical medicine services from DCs, Physical Therapists and Occupational Therapists will continue to find unreasonable and unjustifiable limits on care, while far more expensive and clinically ineffective surgeries and use of drugs will continue unabated and to the detriment of patient care AND cost-containment.

Commissioner Consedine, given PCA's above-stated concerns about this proposed merger and the consequential negative impact on patients, providers and the health care system itself, the PCA has concluded that approval by the PID of the merger of BCNEPA into Highmark is not in the interest of the Commonwealth of Pennsylvania and its citizens, the Corbett Administration, the professionals who deliver these critical health care services and the very integrity of our health care delivery system.

Respectfully,

Case S. Phillips, DC  
President