

ATTESTATION REGARDING HIGHMARK INC. FRAUD, WASTE AND ABUSE POLICIES AND PROCEDURES

Pursuant to the requirements of the Early Retiree Reinsurance Program, which was established by Section 1102 of the Patient Protection and Affordable Care Act, Highmark Inc. d/b/a Highmark Blue Cross Blue Shield and d/b/a Highmark Blue Shield; Keystone Health Plan West, Inc.; Highmark Senior Resources Inc.; and HM Health Insurance Company d/b/a Highmark Health Insurance Company (collectively, "Highmark") hereby attests that it has in place policies and procedures designed to detect, protect against, and reduce healthcare fraud, waste and abuse. Highmark further attests that it will comply timely with requests from the Secretary of the United States Department of Health & Human Services or the Secretary's designee, whether made directly to Highmark or through the Sponsor, to produce such policies and procedures and any documents or data to substantiate the implementation of the policies and procedures and their effectiveness.

Highmark's Financial Investigations and Provider Review Department is devoted to detecting and investigating suspected healthcare fraud, waste and abuse. Highmark has policies and procedures in place that address healthcare fraud, waste and abuse in various ways, including but not limited to:

- Use of data mining and system-driven edits designed primarily to identify potential healthcare fraud and aberrant billing practices by providers;
- Codes of Business Conduct that set the standards for Highmark employees and contractors in the conduct of Highmark's business;
- Corporate Compliance Officer, Integrity Office and Conflict of Interest policies that address employee and organizational conflicts, and promote and enforce corporate governance guidelines designed to promote the highest standards of ethics and compliance;
- Audits of billings submitted by providers;
- Toll-free hotlines and policies that encourage reporting of suspected fraud, theft or other improper conduct.

Signed and Attested to on Behalf of Highmark:

By: Elizabeth A. Farbacher

Elizabeth A. Farbacher

Title: Executive Vice President, Chief Auditor & Compliance Officer

Dated: June 3, 2010