



January 8, 2013

Doris Lefkowitz  
AHRQ Reports Clearance Officer  
Agency for Healthcare Research and Quality  
540 Gaither Road  
Rockville, MD 20850

Dear Ms. Lefkowitz:

***Re: "Medical Expenditure Panel Survey—Insurance Component." – Proposed Additions***

Please accept the following comments on the above referenced Survey. The Self-Insurance Institute of America, Inc. (SIIA) is a national trade association representing self-insured employers and their business partners, including stop-loss insurance carriers.

Specifically, we wish to comment on the proposed additional question – *"For self-insured plans that purchases stop-loss insurance, what is the specific stop-loss coverage amount per employee?"* It is our view that the manner of which the question will create unnecessary confusion among respondents.

Regardless of the attachment point level, a stop-loss insurer never makes a payment to a provider on behalf of an individual, as the employer/plan-sponsor is liable for full payment of every claim against the plan. The stop-loss insurer simply reimburses the plan for claims paid above the contractually agreed upon attachment point levels. Moreover, a stop-loss insurer never provides health coverage to an individual.

For these reasons we believe the wording of the additional question related to stop-loss insurance should be changed to read: *"What is the specific stop-loss deductible on the covered participants of the plan?"* This change will allow for a more accurate collection of data, which will certainly benefit your Agency's mission.

Please contact SIIA Government Relations Director Jay Fahrer at 202-463-8161 or [jfaher@siia.org](mailto:jfahrer@siia.org) should you have any questions regarding these comments.

Thank you for your consideration.

Respectfully,

A handwritten signature in black ink, appearing to read 'Mike Ferguson', is written over a thin horizontal line.

Mike Ferguson  
Chief Operating Officer