



November 20, 2018

Hon. Alex Azar, Secretary
U.S. Department of Health and Human Services
200 Independence Ave, SW
Washington, D.C. 20201

Hon. Elaine Chao, Secretary
U.S. Department of Transportation
1200 New Jersey Ave, SE
Washington, D.C. 20590

Dear Secretary Azar and Secretary Chao,

Among a number of important items, the *FAA Authorization Act of 2018* included language for the establishing of an advisory committee, in consultation with the Secretary of Transportation and the Secretary of Health & Human Services, to focus on air ambulance services, including charge disclosures and balance billing protections. Across the country, members of the Self-Insurance Institute of America, Inc. (SIIA), comprising thousands of self-insured industry participants, including TPAs, brokers and employers, have experienced the challenge of offering patients the services they require, and work to understand and resolve the large surprise bills which many consumers are not able to pay.

As you know, the authorization bill requires that the advisory committee include health insurance providers, consumer advocacy groups and regulators, among others. Considering the unique position of self-funded employee health and workers compensation plans, which service nearly 60% of employers across the country, SIIA respectfully suggests that the air ambulance advisory committee consist of a member from the self-funded industry to represent employers, employees and third-party administrators who have felt the challenges and needs posed by air ambulance services. Unique to self-funding, plans often face the dilemma of protecting plan assets versus exposing their members to co-share amounts that would bankrupt most families. They also face the financial risks of gaps in stop-loss coverage when the fees are found to be excessive.

SIIA appreciates your work in establishing the advisory committee as your department's look at air ambulance charges and its impact on consumers. If you have additional questions, or if SIIA and its members may provide any help, please contact Ryan Work at rwork@siia.org. Thank you for your work on this important issue.

Sincerely,

Michael W. Ferguson
President & CEO
Self-Insurance Institute of America, Inc.