

June 27, 2022

Chiquita Brooks-LaSure  
Administrator  
Centers for Medicare & Medicaid Services  
Department of Health and Human Services  
200 Independence Avenue, SW, Room 445-G  
Washington, DC 20201

Dear Administrator Brooks-LaSure:

Thank you for your tireless work in protecting the wellbeing of all Americans during the pandemic and for the stability you have provided in the Medicare program, including to those who have chosen Medicare Advantage.

We write to express our strong support for the Medicare Advantage program and the high-quality care it provides to over 28 million<sup>1</sup> older adults and people with disabilities, with that number growing to nearly 30 million by the end of 2022. As a diverse group of providers, health systems, consumers and patient advocates, community-based nonprofits, and other health care leaders, we urge the Administration to ensure Medicare Advantage can continue to provide the affordable, high-quality, patient-centered coverage Americans rely on every day.

Enrollment in Medicare Advantage has doubled over the last decade. An estimated 46 percent<sup>2</sup> of Medicare beneficiaries choose Medicare Advantage today and it is projected to become the dominant form of Medicare within the next year<sup>3</sup>, driven by significant gains in enrollment among minority and dual-eligible populations.

Medicare Advantage provides older adults and those with disabilities affordable, high-quality services, including care coordination, disease management programs, out-of-pocket spending limits, access to community-based programs, additional supplemental benefits, and often prescription drug coverage for no additional premium. Older adults on Medicare Advantage report a 94% satisfaction rate<sup>4</sup> with their coverage and quality of care, driven by the wraparound services, innovative clinical care models, and greater financial protections that Medicare Advantage provides.

Medicare Advantage is providing high-quality care with 90% of enrollees in a plan with a quality rating of 4 or more stars<sup>5</sup>. Importantly, Medicare Advantage helps provide a

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<sup>1</sup> <https://www.cms.gov/research-statistics-data-and-systems/statistics-trends-and-reports/mcradvpartdenroldata/monthly/contract-summary-2022-04>

<sup>2</sup> <https://jamanetwork.com/journals/jama/fullarticle/2792809>

<sup>3</sup> <https://www.healthaffairs.org/doi/10.1377/forefront.20220323.773602>

<sup>4</sup> <https://bettermedicarealliance.org/news/poll-shows-overwhelming-support-for-protecting-medicare-advantage-funding/>

<sup>5</sup> <https://www.cms.gov/newsroom/press-releases/cms-releases-2022-medicare-advantage-and-part-d-star-ratings-help-medicare-beneficiaries-compare>

holistic approach to care through access to telehealth services, wellness and physical fitness benefits, in-home care, and benefits that address health-related social needs such as food insecurity, social connections, and transportation needs. This model provides improved health outcomes with 43% fewer avoidable hospitalizations for any condition, lower hospital readmission rates, and higher rates of utilization of preventive services<sup>6</sup>.

Medicare Advantage also supports an increasingly diverse population with varied health and socioeconomic needs. 52% of Medicare Advantage enrollees subsist on incomes of less than 200% of the Federal Poverty Level<sup>7</sup>. Additionally, nearly 16% of Medicare Advantage enrollment comprises of beneficiaries dually eligible for Medicare and Medicaid enrolled in Special Needs Plans.<sup>8</sup> Thankfully, average monthly Medicare Advantage premiums in 2022 will reach historical lows, even as the availability of supplemental benefits continues to increase. The latest Medicare Current Beneficiary Survey (MCBS) data show that Medicare Advantage beneficiaries save nearly \$2,000 per year on total health expenditures compared to those in fee-for-service Medicare<sup>9</sup>. This cost savings is particularly meaningful among communities of color. Today, 53% of Latino Medicare beneficiaries and 49% of Black Medicare beneficiaries, respectively, choose enrollment in Medicare Advantage<sup>10</sup>.

Amid the COVID-19 crisis, Medicare Advantage has continued to serve some of the most at-risk and disproportionately affected populations. During the first nine months of the pandemic, data showed that Medicare Advantage enrollees experienced a 19% lower rate of COVID-19-related hospitalizations compared to fee-for-service Medicare, as well as a lower COVID mortality rate<sup>11</sup>.

Importantly, Medicare Advantage also demonstrates significant value for taxpayers and the health care system. An October 2021 analysis by Milliman found that per-member, per-month spending in Medicare Advantage is nearly \$7 lower than fee-for-service Medicare<sup>12</sup>. The report goes on to explain, "these findings suggest that overall MA offers significant value to the federal government."

Medicare Advantage depends on continued support from policymakers and regulators to deliver these successes for our nation's seniors and people with disabilities. We ask the Administration to protect this coverage lifeline and safeguard important benefits in Medicare Advantage such as those focused on addressing health equity, in-home clinical assessments, and value-based insurance design. We are committed to ensuring that the

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<sup>6</sup> <https://bettermedicarealliance.org/wp-content/uploads/2020/12/BMA-High-Need-Report.pdf>

<sup>7</sup> <https://bettermedicarealliance.org/news/study-medicare-advantage-saves-seniors-nearly-2000-a-year-compared-to-ffs-medicare/>

<sup>8</sup> <https://www.cms.gov/research-statistics-data-and-systems/statistics-trends-and-reports/mcradvpartdenroldataspecial-needs/snp-comprehensive-report-2022-05>

<sup>9</sup> <https://bettermedicarealliance.org/news/study-medicare-advantage-saves-seniors-nearly-2000-a-year-compared-to-ffs-medicare/>

<sup>10</sup> <https://www.managedhealthcareexecutive.com/view/half-of-latinx-black-medicare-beneficiaries-choose-medicare-advantage>

<sup>11</sup> <https://www.modernhealthcare.com/medicare/medicare-advantages-covid-edge-over-fee-service>

<sup>12</sup> <https://www.milliman.com/en/insight/Value-to-the-federal-government-of-medicare-advantage>

more than 28 million Americans who rely on Medicare Advantage can count on stability in the years ahead and continued respect and support for their Medicare coverage choices.

We thank you again for your work to protect the wellbeing of all Americans and appreciate the stability you have provided in Medicare. We look forward to partnering with you to deliver a healthier future for tens of millions of older adults and those with disabilities through a strong, stable, and vibrant Medicare Advantage.

Sincerely,

Adventist Health Policy Association  
agilon Health  
Alliance of Community Health Plans  
American Association of Nurse Anesthesiology  
American Medical Group Association  
America's Physician Groups  
Answer Health  
Arizona Nurses Association  
Asian & Pacific Islander American Health Forum  
Association for Behavioral Health and Wellness  
Association for Community Affiliated Plans  
Austin Regional Clinic  
Better Medicare Alliance  
Buffalo Medical Group  
Central Ohio Primary Care  
ChenMed  
Coalition of Texans with Disabilities  
Collom & Carney Clinic  
Consumer Action  
Council for Affordable Health Coverage  
Dean Care  
Diagnostic Clinic of Longview  
Direct Primary Care Coalition  
Family Care Medical Group  
Gerontological Society of America  
Hawaii Health Network  
Healthcare Leadership Council  
HealthCAWS  
Home Care Association of America  
International Council on Active Aging  
Lark Health  
MANNA

Meals on Wheels America  
Meals on Wheels South Florida  
Medicare Consulting  
National Adult Day Services Association  
National Association of Health Underwriters  
National Coalition on Health Care  
National Hispanic Medical Association  
OakStreet Health  
OPN Healthcare  
Palm Beach Association of Health Underwriters  
Papa  
Partners in Care Foundation  
Peidmont HealthCare  
Physicians of Southwest Washington IPA  
Pinehurst Medical Clinic, Inc.  
Pioneer Physicians Network  
Podimetrics  
Population Health Alliance  
Preferred Primary Care Physicians  
Premier Family Physicians, Austin, Texas  
Prevea Health  
Public Sector HealthCare Roundtable  
SCAN Health Plan  
Signify Health  
SilverSneakers,  
SNP Alliance  
Starling Physicians  
Teacher's Retirement System of Kentucky  
The Drapin Group  
The Jackson Clinic  
The Kendal Corporation  
Tivity Health  
Toledo Clinic  
United Physicians, Inc.  
UPMC Health Plan  
Vancouver Clinic  
VNS Health