

August 30, 2022

Ms. Chiquita Brooks-LaSure
Administrator
Centers for Medicare & Medicaid Services
Department of Health & Human Services
200 Independence Avenue SW
Washington, D.C. 20201

Attn: CMS-4203-NC; Request for Information on Medicare Program – Medicare Advantage

Dear Administrator Brooks-LaSure,

I appreciate the opportunity to submit comments in response to the request for information on Medicare Advantage. I am the Director of Retiree Health Care at the Teachers' Retirement System of Kentucky (TRS), and I am writing to express my desire that valuable health benefits for our retired members will be preserved.

Now in our 16th year with Medicare Advantage, TRS currently covers more than 38,000 retired Kentucky teachers and their spouses on a Medicare Advantage Employer Group Waiver Plan (EGWP). The Medicare Advantage program now enjoys broad support in Congress. Medicare Advantage has enabled TRS to better serve our retired members via an EGWP which provides care coordination, Part D drug coverage, stable benefits and high satisfaction rates among our members.¹ With a Medicare Advantage EGWP, TRS has achieved stability with premiums, and the 2022 premium is less than the premium 20 years ago, with no material changes to the existing plan benefit design. The TRS Other Post Employment Benefit (OPEB) actuarial liability was reduced by \$1.9 billion with the move to Medicare Advantage.

The committed public servants, now retired, that make up our membership have limited budgets, and Medicare Advantage has helped to reduce the strain. Medicare Advantage beneficiaries spend \$2,000 less on out-of-pocket costs and premiums compared to those covered by Medicare Fee-for-Service (FFS) plans, all while receiving additional benefits not available under FFS plans.² As a result, changes to EGWPs have the potential to increase costs for our retired educators.

TRS ensures that the Medicare Advantage carrier uses the Medicare subsidy revenue to lower premiums; offer supplemental value-added benefits; perform care and case management; offer incentive wellness programs; and supply heightened customer service. None of this exists in original Medicare FFS. TRS ensures that greater medical management strategies and programs are designed and utilized for more effective clinical intervention, coordinated care and member engagement.

¹ Better Medicare Alliance, Employer Group Waiver Plans, https://bettermedicarealliance.org/wp-content/uploads/2020/03/BMA_EmployerGroupWaiverPlans_WhitePaper_2018_03_02_FINAL.pdf

² Better Medicare Alliance: Medicare Advantage Outperforms FFS Medicare on Cost Protections for Low-Income and Diverse Populations, https://bettermedicarealliance.org/wp-content/uploads/2022/04/BMA-Medicare-Advantage-Cost-Protections-Data-Brief_FIN.pdf

The value-added supplemental benefits offered to retired Kentucky teachers include:

- SilverSneakers
- Post-hospitalization meal delivery
- Weight loss program
- Hearing aid allowance and discounts
- Telehealth, virtual visits
- Medical transportation after certain discharges
- HouseCalls incentive — These visits help to keep retirees engaged with their doctors to get annual visits, receive screenings, vaccines and prescriptions.
- Incentive wellness rewards program

Better health outcomes help keep healthcare costs down. TRS has favorable outcomes with the utilization of Medicare Advantage. Some examples are:

- *In 2021, Retiree patients received over 9,567 HouseCalls visits per year allowing thousands of referrals to clinical management and case management programs*
- *In **2021**:*
 - *85% of eligible female retirees had their breast cancer screening*
 - *80% of eligible retirees had a colon cancer screening*
 - *82% of eligible retirees completed a diabetic eye exam*
 - *56% of retirees had a Medicare Annual Wellness Visit*
 - *73% of retirees had a Hemoglobin A1C*
- *In 2020:*
 - *7,856 open care gaps were addressed in the diabetic population*
 - *734 home screening kits mailed*
 - *1,880 inpatient cases supported by transitional care*

It's not just Kentucky's retired teachers, however, who have come to rely on Medicare Advantage. Retirees of many different backgrounds in this state currently benefit from EGWPs. In fact, up to 39% of all Medicare Advantage beneficiaries in Kentucky are enrolled in EGWPs.³

On behalf of TRS's retired members, I urge you to protect the EGWP waiver program to ensure our retired educators continue to have access to affordable, innovative health care benefits that are person-centered. TRS is a quasi-state agency that is non-partisan and supports all efforts to increase value in health care for our retirees. Thank you for your consideration. If you have any questions, please reach me at jane.gilbert@trs.ky.gov.

Sincerely,



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³ Better Medicare Alliance, Employer Group Waiver Plans, https://bettermedicarealliance.org/wp-content/uploads/2020/03/BMA_EmployerGroupWaiverPlans_WhitePaper_2018_03_02_FINAL.pdf