

August 29, 2022

Centers for Medicare and Medicaid Services
Department of Health and Human Services
Attention: CMS-4203-NC
200 Independence Avenue SW
Washington, DC 20201

**RE: Medicare Program
Request for Information on Medicare Advantage**

Dear Administrator Brooks-LaSure:

On behalf of the National Black Nurses Association (NBNA), I am writing in support of Medicare Advantage. NBNA represents 308,000 African American registered nurses and is comprised of 111 chapters in 33 states and the District of Columbia. NBNA serves as the voice for African American nurses and diverse populations ensuring equal access to professional development, promoting educational opportunities and improving health. Our members believe a person-centered care approach, such as in the Medicare Advantage program, is essential to improving overall health of African American seniors and people with disabilities.

Medicare Advantage plans offer greater access to care. Nearly 50%¹ of African American Medicare beneficiaries choose Medicare Advantage plans over Medicare Fee-for-Service (FFS) plans. Most Medicare Advantage plans provide access to dental, vision, hearing, fitness and wellness benefits, which are not offered in FFS Medicare. Greater than 90% of Medicare Advantage plans provide telehealth options, a growing service to improve access to care.² Medicare Advantage also drives better health outcomes for its beneficiaries, compared to FFS, including fewer hospitalizations, higher vaccination rates, and fewer emergency room visits.

Unlike FFS, the Medicare Advantage program is working to address social determinants of health with innovative benefits that promote health and improve outcomes, in particular, for our most vulnerable African American seniors. These benefits include enhanced screenings on social needs, providing meals and nutritional support, fitness center supplements, and supporting access to affordable housing.

We urge CMS to preserve the Medicare Advantage program. Medicare Advantage provides affordable, high quality, equitable and patient-centered coverage to populations our members serve.

We welcome the opportunity to work with you to ensure that seniors continue to have access to the Medicare Advantage program. If you have any questions about our comments, please contact me at info@nbna.org.

Sincerely,

Dr. Martha A. Dawson
NBNA President

¹ Milliman, Comparing the Demographics of Enrollees in Medicare Advantage and Fee-for-Service Medicare, October 2020.

²Better Medicare Alliance, Medicare Advantage Sees Fewer COVID-19 Hospitalizations in Beneficiaries and Offers Greater Access to In-Person and Telehealth Non-COVID Care During Pandemic, October 2021. Available at: <https://bettermedicarealliance.org/wp-content/uploads/2021/10/BMA-Q3-Data-Brief-FIN-1.pdf>