



*Providing quality coverage to nearly 3 million Medicaid and private sector enrollees in Wisconsin.*

To: Administrator Chiquita Brooks-LaSure  
Centers for Medicare & Medicaid Services  
Department of Health & Human Services  
From: R.J. Pirlot, Executive Director  
Date: August 26, 2022  
Re: CMS-4203-NC

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Thank you for the opportunity to submit comments in response to the Request for Information Medicare Program on the Medicare Advantage program, published in the Federal Register on August 1, 2022 (CMS-4203-NC).

The Alliance of Health Insurers (AHI) was founded to promote essential and effective health insurance industry regulations that serve to foster innovation, eliminate waste and protect Wisconsin health care consumers. AHI member companies employ more than 14,000 people in Wisconsin and provide health care coverage to roughly two million residents in large group, small group, or individual commercial market plans. In addition, AHI member companies provide managed care services to approximately 490,400 participants in Wisconsin's BadgerCare and SSI MA programs.

We urge you to preserve and strengthen the Medicare Advantage program, which provides affordable, high-quality coverage that Wisconsinites rely on every day. Nearly 48% of Wisconsin Medicare beneficiaries choose Medicare Advantage over traditional Medicare plans because of the program's innovative benefits that help promote health and improve outcomes for seniors.

Importantly, Medicare Advantage is a better value for both patients and for the federal government. Medicare Advantage offers more services than Fee-for-Service (FFS) Medicare, including in-home caregiver support, vision, hearing and dental benefits, and other wellness programs, with lower out-of-pocket costs for patients. Medicare Advantage covers all these Medicare-covered services for 24% less than FFS Medicare and provides an added value of \$32.5 billion in services to beneficiaries and the federal government each year.

Thank you for your continued support for all Medicaid and Medicare beneficiaries. AHI member companies remain committed to working with you and other policymakers, and engaging stakeholders to develop sustainable health care solutions for Wisconsinites.