



Lev Ginsburg
General Counsel

August 17, 2022

Centers for Medicare & Medicaid Services, Department of Health and Human Services,
Attention: CMS-4203-NC
P.O. Box 8013, Baltimore, MD 21244-8013

Re: CMS-4203-NC

As the largest state-wide business association in New York State, The Business Council has a vested interest in the health of our community and New York's seniors. I am writing in support of the continued utilization of Medicare Advantage Plans (MA) for their great benefits to consumers, the federal government and the population at large. The Program has had great success in improving quality and reducing costs and should be continued into the future.

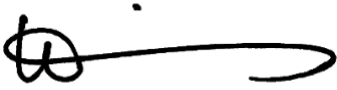
MA is a popular option for Medicare beneficiaries, and in particular for minorities and low-income beneficiaries. These plans have been proven to be highly effective in reducing preventable hospital readmissions, increasing the use of primary care, and managing chronic illnesses. MA plans also provide additional benefits that improve the health of New York's dually eligible seniors (Dual Eligibles), those eligible for both Medicare and Medicaid benefits, and ultimately reduce costs to New York's Medicaid program. Because MA plans are required to pay for MA benefits covered by Medicaid first, they reduce the cost of Medicaid for Dual Eligibles and other State taxpayers. Moreover, Dual Eligibles receive better access to coordinated care through MA plans and, as a result, have 41% fewer avoidable acute hospitalizations than Medicare FFS beneficiaries and are 42% less likely to utilize nursing homes compared to Dual Eligibles in fee-for-service.

Further, MA patients have much higher rates of primary and preventative care, which lowers costs for the healthcare system in general. For example, flu vaccination rates are a remarkable 52% higher than comparable Medicare FFS vaccination rates. MA beneficiaries experienced 33% fewer Emergency Room visits than Medicare FFS beneficiaries and saw primary care providers 21% more often.

From a strictly fiscal vantage point, MA provides both savings to seniors and the federal government. Seniors in MA report spending nearly \$2,000 less on out-of-pocket costs and premiums compared to FFS Medicare beneficiaries, that's almost 36% less than FFS Medicare beneficiaries in out-of-pocket costs and premiums each year. Importantly, MA also creates value for the government since MA is paid 1% less than Medicare FFS and MA covers all Medicare-covered services for 24% less than FFS Medicare.

Medicare Advantage is one of those rare programs and public policies that truly creates a win-win. The program is enjoyed by enrollees, saves money for seniors and saves money for the government. The continued used of such a successful program is an advantage to all and we hope to see its utilization and growth for years to come.

Very truly yours,

A handwritten signature in black ink, consisting of a stylized initial 'L' followed by a long horizontal stroke that ends in a small hook.

Lev A. Ginsburg, Esq.