



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

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

August 12, 2022

Dear Administrator Brooks-LaSure:

On behalf of the Gerontological Advanced Practice Nurses Association (GAPNA), I am offering this letter in response to the request for information (RFI) on the Medicare Advantage program. As the premier professional organization representing the interests of nurse practitioners and all providers who work with older adults, we strongly believe that Medicare Advantage is a valuable program.

One of the key benefits of Medicare Advantage for both providers and our patients is the focus on value-based care. **This person-centered care model leads to better health outcomes for our patients.** On average, Medicare Advantage beneficiaries access more primary care services and have a 52% higher vaccination rate for pneumonia, compared to Medicare Fee-for-Service (FFS) beneficiaries. With this quality and holistic approach to care, Medicare Advantage patients experience 41% fewer hospitalizations and 33% fewer emergency department visits, compared to FFS.¹

As part of this person-centered care model, Medicare Advantage provides near universal access to health care services for our patients. Medicare Advantage also provides a number of benefits that are not available to patients through FFS, notably dental, vision and wellness benefits, which are valued highly by our patients.

As an organization devoted to accessible and affordable care for all aging Americans, we urge you to maintain the Medicare Advantage program and the benefits it provides going forward.

Thank you for your consideration of these comments, and for allowing us to share our unique position as health care providers for older American adults. Should you have any questions or need further information, please do not hesitate to contact us at gapna@gapna.org.

Sincerely,

A handwritten signature in black ink that reads "Natalie Baker".

Natalie R. Baker, DNP, CRNP, GS-C, CNE, FAANP, FAAN
2021 – 2022 President
Gerontological Advanced Practice Nurses Association

¹ Better Medicaid Alliance: Positive Outcomes for High Need, High-Cost Beneficiaries in Medicare Advantage Compared to Traditional Fee-For-Service Medicare ([Link](#))