



August 31, 2022

Ms. Chiquita Brooks-LaSure  
Administrator  
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**

Dear Administrator Brooks-LaSure:

Thank you for the opportunity to respond to the Centers for Medicare & Medicaid Services' (CMS) request for information (RFI) on the Medicare Advantage program on behalf of the Georgia Chamber of Commerce and our 47,000 members.

We are the state's largest business advocacy organization, representing investors in every county of Georgia. Our membership includes small storefronts to large corporations with a diverse cross section of more than 500 industry sectors.

We believe in the value provided by the Medicare Advantage Program and urge CMS to ensure all seniors and individuals with disabilities have access to affordable, quality care. By offering comprehensive services that go beyond what is available in Medicare Fee-for-Service, Medicare Advantage ensures beneficiaries have comprehensive, quality care, as well as assistance with wrap-around services like affordable housing, food and transportation. We also support efforts to modernize and simplify the way Medicare Advantage uses prior authorization as a clinical tool to facilitate coordinated care.

In Georgia, Medicare Advantage is helping roughly one million seniors live healthier lives. Nearly 50 percent of Georgia seniors are enrolled in Medicare Advantage plans.<sup>1</sup> Most of these plans offer prescription drug coverage, dental, vision, hearing and wellness benefits, as well as enhanced telehealth services to provide seniors with robust and convenient care.

Georgia businesses strive to offer their employees quality, affordable health coverage through a wide range of options, including through Medicare Advantage and the Employer Group Waiver

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<sup>1</sup> Better Medicare Alliance, Medicare Advantage Enrollment Map, 2021 ([link](#))

Plans (EGWPs). In Georgia, about 158,287 retirees are enrolled in EGWPs, representing roughly 26 percent of Medicare Advantage enrollment in the state.<sup>2</sup> These plans provide a valuable option for private companies, as well as state and local governments.

Given the benefits of Medicare Advantage, we urge CMS to strengthen the Medicare Advantage Program, modernize the prior authorization process, and encourage efforts to expand access to EGWPs to reach Georgia's rural areas, where roughly 17 percent of the state's population resides.<sup>3</sup>

By strengthening the Medicare Advantage Program, CMS can help ensure all seniors and individuals with disabilities have access to quality care at the best value.

Thank you for taking the time to review our comments. If you have any questions, please contact us at (404) 223-2264.

Sincerely,

A handwritten signature in black ink, appearing to read "Chris Clark". The signature is fluid and cursive, with a large initial "C" and "C".

Chris Clark,  
President & CEO  
Georgia Chamber of Commerce

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<sup>2</sup> Centers for Medicare & Medicaid Services. Medicare Advantage enrollment and contract data, January 2018.

<sup>3</sup> Rural Health Information Hub. Georgia. 11/19/21 ([link](#))