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August 29, 2022

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

**RE: CMS-4203-NC – Centers for Medicare and Medicaid Services (CMS) Medicare Program: Request for Information on Medicare Advantage**

Dear Administrator Brooks-LaSure,

The National Hispanic Medical Association (NHMA) appreciates the opportunity to respond to the Centers for Medicare and Medicaid Services' request for information on the Medicare Advantage program. As an organization dedicated to representing the interests of more than 50,000 licensed Hispanic physicians, we strongly urge you to protect and strengthen the Medicare Advantage program, which serves as a vital form of coverage for many of our members' patients.

Medicare Advantage plays an important role in expanding access to quality care among Hispanic seniors across the country. These plans offer comprehensive services like vision, dental and hearing that go beyond what traditional Medicare covers, which is important to our members who are focused on ensuring their patients are receiving coordinated and clinically appropriate care. We strongly believe Medicare Advantage is a valuable pathway to advance health equity – a priority for our organization. More than half of Hispanic Medicare beneficiaries choose Medicare Advantage over Medicare Fee-for-Service (FFS).<sup>1</sup> That's because these plans offer a better value for higher quality care. Black and Latino Medicare Advantage beneficiaries save an average of \$1,270 and \$1,113 per year, respectively, as compared to Medicare (FFS).<sup>2</sup> Black and Hispanic seniors enrolled in Medicare Advantage are more likely to report receiving routine health care services, including mammograms, flu shots, blood pressure screenings, and cholesterol checks, compared to their peers enrolled in FFS.<sup>3</sup>

As CMS continues to focus on advancing health equity and addressing social determinants of health, we hope you consider Medicare Advantage as critical to achieving those goals, as these plans focus on both the medical and social needs of its beneficiaries. For example, Medicare Advantage beneficiaries have access to meals and nutrition services, as well as support for affordable housing in addition to medical care.

Thank you again for the opportunity to provide comments on the Medicare Advantage program. We are happy to answer any questions or provide additional information at (202) 628-5895.

Sincerely,

Elena Rios, MD, MSPH, MACP  
President & CEO

<sup>1</sup> Better Medicare Alliance, Medicare Advantage Offers High Quality Care and Cost Protections to Racially and Ethnically Diverse Beneficiaries, June 2021. Available at: [https://bettermedicarealliance.org/wp-content/uploads/2021/06/BMA\\_2021-Q2-Data-Brief\\_6.15.21.pdf](https://bettermedicarealliance.org/wp-content/uploads/2021/06/BMA_2021-Q2-Data-Brief_6.15.21.pdf)

<sup>2</sup> Better Medicare Alliance, Medicare Advantage Outperforms FFS Medicare on Cost Protections for Low-Income and Diverse Populations, April 2022. Available at: [https://bettermedicarealliance.org/wp-content/uploads/2022/04/BMA-Medicare-Advantage-Cost-Protections-Data-Brief\\_FINv2.pdf](https://bettermedicarealliance.org/wp-content/uploads/2022/04/BMA-Medicare-Advantage-Cost-Protections-Data-Brief_FINv2.pdf)

<sup>3</sup> Better Medicare Alliance, Medicare Advantage Outperforms FFS Medicare on Cost Protections for Low-Income and Diverse Populations, April 2022. Available at: [https://bettermedicarealliance.org/wp-content/uploads/2022/04/BMA-Medicare-Advantage-Cost-Protections-Data-Brief\\_FINv2.pdf](https://bettermedicarealliance.org/wp-content/uploads/2022/04/BMA-Medicare-Advantage-Cost-Protections-Data-Brief_FINv2.pdf)