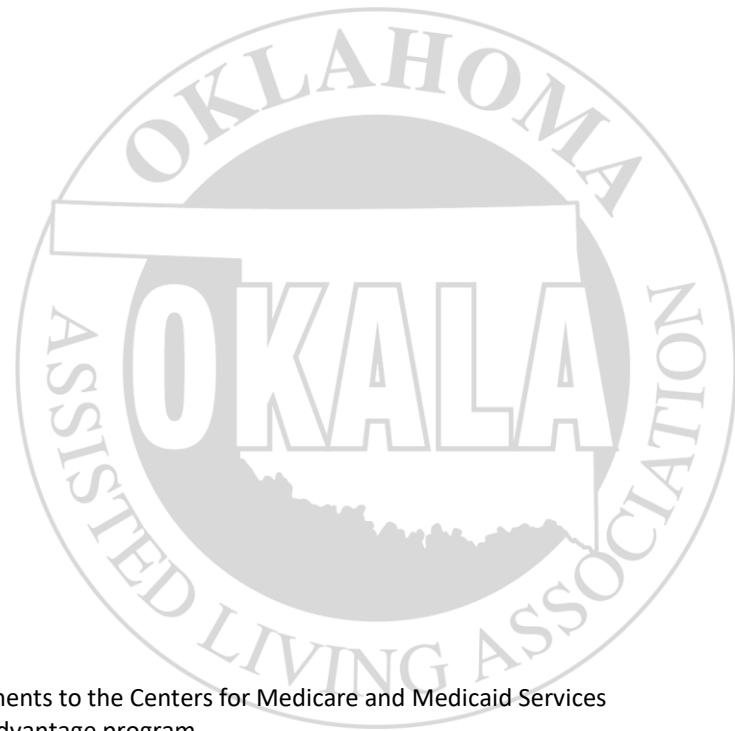




**OKLAHOMA  
ASSISTED LIVING ASSOCIATION**



August 31, 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**

Dear Administrator Brooks-LaSure,

The Oklahoma Assisted Living Association (OKALA) submits these comments to the Centers for Medicare and Medicaid Services (CMS) in response to a request for information (RFI) on the Medicare Advantage program.

OKALA is made up of owners and operators of assisted living, memory care, continuing care retirement, residential care, and independent living communities. These communities care for over 13,000 seniors across the great state of Oklahoma. The residents average 85 years of age, with the majority having chronic health conditions and needing assistance with activities of daily living such as bathing, eating, toileting, as well as personal and health care services. Our members also include industry partners that are home health, home care, hospices, pharmacies, mobile x-ray, physicians at home and skilled nursing that care for Oklahomans in their home or provide temporary services.

The pandemic has taken a huge toll on the assisted living environment. Unfunded mandates as well as the labor crisis has resulted in assisted livings either raising rates or closing their doors. In Oklahoma, we have had 5 close this year displacing over 350 seniors. Oklahoma's seniors and retirees can not afford to have the Medicare Advantage plan reduced or taken away.

**We urge CMS to protect this vital health care option for Oklahoma's seniors and retirees.**

More than 460,000 Oklahomans<sup>1</sup> are enrolled in Medicare Advantage plans, which offer comprehensive, high-quality, affordable health care. Medicare Advantage beneficiaries report spending nearly \$2,000 less on out-of-pocket costs and premiums compared to those enrolled in traditional Medicare.<sup>2</sup>

Medicare Advantage offers Oklahoma seniors valuable services that go beyond traditional medical care, including vision, dental, hearing as well as enhanced telehealth services which is **vital** during COVID outbreaks. Ensuring these plans are widely accessible is a priority for OKALA.

We appreciate the opportunity to submit comments on this important program. Should you request additional information, please contact Patrick Gaines at 405.831.7092 or [contact@patrickgaines.net](mailto:contact@patrickgaines.net)

Sincerely,

*Melissa Holland*

Melissa Holland, Executive Director  
Oklahoma Assisted Living Association

cc: Patrick Gaines, Gaines Government Services, LLC

<sup>1</sup> Better Medicare Alliance, Medicare Advantage Enrollment Map. <https://bettermedicarealliance.org/medicare-advantage/about-medicare-advantage/medicare-advantage-enrollment-map/>

<sup>2</sup> Better Medicare Alliance, Medicare Advantage Outperforms FFS Medicare on Cost Protections for Low-Income and Diverse Populations, April 2022. [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)