

The Insurance Federation of Pennsylvania
www.ifpenn.org

August 31, 2022

Chiquita Brooks-Lasure, Administrator
Centers for Medicare and Medicaid Services
Department of Health and Human Services
200 Independence Avenue SW
Washington, D.C. 20201

Re: CMS-4203-NC; Request for Information (RFI) on Medicare Advantage

Dear Administrator Brooks-Lasure:

In the spirit of the RFI's desire for enhanced stakeholder engagement, we offer the following comments on behalf of our commercial health insurance members that participate in the Medicare Advantage Program. By way of introduction, I head up the Insurance Federation of Pennsylvania, the trade association for the insurance industry here; our members include some of the leading participants in the Medicare Advantage Program here and nationally, including Aetna, Cigna, United and UPMC Health.

The RFI raises 46 questions spanning five topics to determine, in a broader sense, if the diverse needs of the Medicare Advantage population are being met now and will be in the future. We'll defer to others for answers to the specific questions; as to those broader questions, we believe the answer to both in Pennsylvania is yes.

According to [healthinsurance.org](https://www.healthinsurance.org/medicare/pennsylvania/) (<https://www.healthinsurance.org/medicare/pennsylvania/>), Pennsylvania has one of the most competitive Medicare Advantage markets in the country. This option is popular amongst our sizable senior population – 2.8 million or 22% of the overall population – with nearly half of these individuals enrolled in a Medicare Advantage plan.

As to why the Medicare Advantage Program is so popular in Pennsylvania:

- **Additional benefits:** Prescription drugs, dental, vision, hearing, wellness, and telehealth are commonly covered under Medicare Advantage plans.
- **Value:** Coverage for these benefits at a fixed premium means less out of pocket expense, something that is particularly important to elderly participants living on a fixed income.

- **Innovation:** Unlike traditional Medicare, Medicare Advantage plans are able to tailor their benefits to promote health and improve outcomes, especially for the most vulnerable seniors.

For all of these reasons, the story of the Medicare Advantage Program in Pennsylvania is one of success. And as the needs of our elderly population change, we are confident the plans will adapt to meet them. We'll offer one recommendation: We believe much of the success of the Medicare Advantage Program in Pennsylvania reflects the collaborative framework CMS has established with insurers and others in implementing and revising the program. We hope that approach continues in the future, and we appreciate this RIF is an affirmation of that.

Thank you for your consideration of these comments. We welcome the opportunity for continued collaboration in the future.

Sincerely,

A handwritten signature in black ink, appearing to read "Jonathan C. Greer". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Jonathan C. Greer

President and CEO
Insurance Federation of Pennsylvania