

August 30, 2022

Administrator Brooks-LaSure
Centers for Medicare & Medicaid Services
Department of Health & Human Services
Attn: CMS-4203-NC
200 Independence Avenue SW
Washington, DC 20201

RE: Centers for Medicare and Medicaid Services (CMS) Medicare Program
Request for Information on Medicare Advantage

Dear Ms. Brooks-LaSure,

On behalf of the Coalition of Texans with Disabilities (CTD), I am submitting these comments in response to the Request for Information (RFI) on Medicare Advantage. CTD is the oldest and largest member-driven disability advocacy organization in the state. We work in the areas of legislative advocacy, grassroots organizing, public awareness, and the promotion of self-direction to make Texas a leader in disability-related public policy and culture.

Through our advocacy work, we have made substantial progress in Texas public policy to address the concerns and issues of Texans living with disabilities. We are continuing to work toward a barrier-free Texas in the 21st century.

For many Texans with disabilities, Medicare Advantage Special Needs Plans (SNPs) provide an accessible, affordable and comprehensive health care option. Today, there are more than 1,100 individual SNPs¹ collectively serving more than 4.6 million people².

Through SNPs, care can be coordinated and tailored for our most vulnerable, medically complex, and historically underserved populations. A greater proportion of SNPs provide supplemental benefits such as over-the-counter benefits (93% of plans), transportation to

¹ Kaiser Family Foundation: *Medicare Advantage 2022 Spotlight: First Look*, November 2, 2021. <https://www.kff.org/medicare/issue-brief/medicare-advantage-2022-spotlight-first-look/>

² CMS: *SNP Comprehensive Report*, February 2022. <https://www.cms.gov/research-statistics-data-and-systems/statistics-trends-and-reports/mcradvpartdenrolataspecial-needs/snp-comprehensive-report-2022-02>

medical appointments (87% of plans), in-home support services (25% of plans), and bathroom safety devices (12% of plans), compared to benefit offerings for the general Medicare population.³

These benefits can make a meaningful difference in overall health outcomes for beneficiaries. Medicare Advantage beneficiaries with disabilities under the age of 65 were 56% more likely to receive a diabetic eye exam, 27% more likely to be screened for depression, 14% more likely to receive the flu vaccine, and 7% more likely to be screened for breast cancer than similar beneficiaries in Fee-for-Service (FFS) Medicare.⁴

Thank you for your consideration of our comments. If you have any questions, please contact us at info@txdisabilities.org or (512) 478-3366.

Sincerely,

A handwritten signature in blue ink, appearing to read "Dennis Borel", with a long horizontal line extending to the left.

Dennis Borel, Executive Director
Coalition of Texans with Disabilities

³ Kaiser Family Foundation: *Medicare Advantage 2022 Spotlight: First Look*, November 2, 2021. <https://www.kff.org/medicare/issue-brief/medicare-advantage-2022-spotlight-first-look/>

⁴ Better Medicare Alliance: *Positive Outcomes for High-Need, High-Cost Beneficiaries in Medicare Advantage Compared to Traditional Fee-For-Service Medicare*, December 2020. <https://bettermedicarealliance.org/wp-content/uploads/2020/12/BMA-High-Need-Report.pdf>