



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

Dear Administrator Brooks-LaSure,

Wisconsin Manufacturers & Commerce (WMC) welcomes the opportunity to provide comments in response to the Centers for Medicare and Medicaid Services (CMS) request for information (RFI) on the Medicare Advantage program.

WMC is the largest general business association in Wisconsin, representing approximately 3,800 member companies of all sizes, located throughout the state and from every sector of the economy. WMC is the state chamber of commerce, state manufacturers' association and state safety council. Since its founding in 1911, WMC's mission has been to make Wisconsin the most competitive state in the nation to do business. A part of that mission is to provide valuable, up-to-date and timely information to our members and advocate on their behalf to achieve positive public policy outcomes.

Ensuring that Wisconsin employers can offer their retired employees access to quality, affordable health coverage is a priority for WMC. To that end, we urge CMS to protect and strengthen the Medicare Advantage program, which nearly 600,000 Wisconsin seniors rely on for their health care.<sup>1</sup>

Medicare Advantage beneficiaries enjoy robust, comprehensive services at a great value. In fact, seniors enrolled in Medicare Advantage plans report spending roughly \$2,000 less on out-of-pocket costs and premiums compared to those enrolled in Medicare Fee-for-Service.<sup>2</sup>

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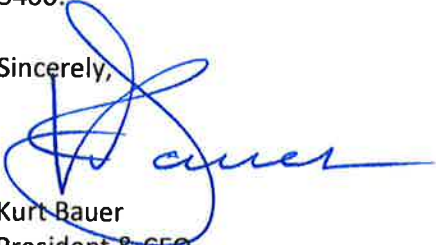
<sup>1</sup> Better Medicare Alliance, Medicare Advantage Enrollment Map. Available at: <https://bettermedicarealliance.org/medicare-advantage/about-medicare-advantage/medicare-advantage-enrollment-map/>

<sup>2</sup> Centers for Medicare & Medicaid Services, "CMS Releases 2022 Premiums and Cost-Sharing Information for Medicare Advantage and Prescription Drug Plans," September 30, 2021. Available at: <https://www.cms.gov/newsroom/press-releases/cms-releases-2022-premiums-and-cost-sharing-information-medicare-advantage-and-prescription-drug>

Additionally, Medicare Advantage's Employer Group Waiver Plans (EGWP) allow Wisconsin's businesses to offer quality, affordable coverage to their retired employees. These plans are increasingly offered by employers across the country because of the high value and quality they provide.

We appreciate CMS's efforts to improve the Medicare Advantage program and stand ready to assist in any way we can. Should you require additional information or have questions, please contact Rachel Ver Velde, our Director of Workforce, Education and Employment Policy, at [rvervelde@wmc.org](mailto:rvervelde@wmc.org) or 608-258-3400.

Sincerely,

A handwritten signature in blue ink, appearing to read "Kurt Bauer", with a large, stylized flourish above the name.

Kurt Bauer  
President & CEO  
Wisconsin Manufacturers & Commerce