

# BETTER MEDICARE

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## ALLIANCE

March 11, 2024

The Honorable Chiquita Brooks-LaSure  
Administrator  
Centers for Medicare & Medicaid Services  
Department of Health and Human Services  
200 Independence Avenue, SW, Room 445-G  
Washington, DC 20201

Dear Administrator Brooks-LaSure:

Thank you for your ongoing leadership in protecting health care access for the more than 32 million seniors and people with disabilities who choose Medicare Advantage. As a diverse group of stakeholders, we want to recognize the Centers for Medicare & Medicaid Services (CMS) focus on improving Medicare Advantage for beneficiaries and the opportunity to engage in the public comment period.

Medicare Advantage currently serves 51 percent of the Medicare population, which is expected to increase in 2024 as enrollment is projected to reach nearly 34 million beneficiaries. Medicare Advantage also covers an increasingly diverse population, with the largest increases in enrollment among historically underserved populations, including Black, Latino, Asian American, Native Hawaiian, Pacific Islander, dual eligible, and low-income beneficiaries.

As we assess the impact of the CY 2025 Medicare Advantage Advance Notice, we are concerned that the current proposal does not fully account for the sharp increase in seniors' utilization of health care services, in part due to the significant increase in use of health care services that is occurring following the COVID-19 pandemic. Nearly **one-quarter** of Medicare beneficiaries reported delaying care during the pandemic<sup>1</sup>, and many are now pursuing the care that they need. Current data backs up this trend. A range of external reports, including a recent analysis by Berkeley Research Group (BRG), cite higher growth trends than CMS's estimates.

For these reasons, we believe CMS should incorporate more recent and complete data when finalizing the Rate Notice. This data should reflect current utilization and cost trends to promote stability in the Medicare Advantage program and continued progress in advancing health equity, preventing disease progression, and delivering high-value, high-quality care.

The BRG analysis indicates the impact these changes could have on beneficiaries if the final Rate Notice does not account for increased health care utilization. On average, beneficiaries may experience a \$33

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<sup>1</sup> [How Has Healthcare Utilization Changed Since the Pandemic? - Health System Tracker](#)

reduction in health care value per month, and more complex populations like dual eligibles may experience a higher reduction of \$50 per month, on average<sup>2</sup>.

We must protect the high-quality health care that Medicare Advantage beneficiaries rely on, which includes low premiums and a robust range of supplemental benefits. Any changes that jeopardize these benefits could mean a loss of dental, hearing, and vision coverage, reduced access to telehealth benefits, decreased allowances to help beneficiaries afford over-the-counter products, reduced behavioral health services, diminished transportation benefits to health care appointments, fewer nutrition-related services or prepared meals after a hospital or nursing facility stay, and decreased access to physical fitness and wellness services. Beneficiaries have come to rely on these benefits, and losing them, coupled with increased health care costs, is a burden many of these seniors cannot afford.

**We urge CMS to promote the stability of Medicare Advantage by finalizing rates that reflect the higher utilization trends being publicly reported and ensure any proposed changes in the final Rate Notice protect and strengthen the program.** Moreover, the Medicare Advantage program continues to adjust to significant policy changes implemented in recent years, including the phase-in of a new risk model, additional changes to the way the program is administered and funded, along with reforms supported by BMA such as modernizing the prior authorization process and ensuring accuracy and transparency in marketing for beneficiaries. There may be variability in how beneficiaries and stakeholders are impacted by these ongoing changes as well; For example, special needs plans (SNPs) serve very high concentrations of high need, medically complex individuals, making stability particularly imperative because of the vulnerable population served. Further changes risk disrupting seniors' access to care, and we are concerned the Advance Notice does not align with the goals<sup>3</sup> we share with CMS to promote strength and stability in Medicare Advantage.

We appreciate CMS working with all stakeholders to assess the impacts these proposals will have on beneficiaries, especially vulnerable populations, whose needs are best served by the comprehensive, coordinated care delivered in Medicare Advantage. We look forward to continued partnership with CMS, other policymakers, and stakeholders to ensure that all Medicare beneficiaries receive equitable, high-quality, and affordable health care.

Sincerely,

Better Medicare Alliance

Academy of Managed Care Pharmacy

Academy of Nutrition and Dietetics

agilon health

agilon Network of 2,400+ Primary Care Physicians

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<sup>2</sup> [MA Advance Notice Does Not Offset Rising Medical Costs and Could Lead to Reduced Healthcare Value for Beneficiaries - Berkeley Research Group](#)

<sup>3</sup> [Strengthening Medicare Advantage for Beneficiaries: Recommendations for Policymakers - Better Medicare Alliance](#)

America's Physician Groups  
American Association on Health and Disability  
American Medical Group Association  
American Muslim Health Professionals  
American Occupational Therapy Association  
American Telemedicine Association  
Arizona Council of Human Service Providers  
Arizona Nurses Association  
Arizona Public Health Association  
Asian American & Pacific Islander Chamber of Commerce of Southern Nevada  
Association for Behavioral Health and Wellness  
Association for Community Affiliated Plans  
Association of California Life and Health Insurance Companies  
ATA Action (American Telemedicine Association)  
Austin Regional Clinic (TX)  
Business & Industry Association of New Hampshire  
CalChamber (CA)  
Coalition for Kidney Health  
Coalition of Texans with Disabilities  
Commonwealth Care Alliance  
Disability Advocates of Kent County (MI)  
El Paso Health (TX)  
Georgia Association of Community Service Boards  
Georgia Chamber of Commerce  
Georgia Psychiatric Physicians Association  
Gerontological Advanced Practice Nurses Association  
Global Link International  
Granite YMCA (NH)  
Greater Phoenix Chamber (AZ)

HCG Secure

HealthCAWS

Health Plan Partnership of Minnesota

Healthcare Leadership Council

Insurance Federation of Pennsylvania

International Council on Active Aging

Lakes Region Mental Health Center (NH)

Lakeshore Foundation (AL)

Las Vegas HEALS (NV)

Louisiana Association of Health Plans

Meals on Wheels America

Meals on Wheels of Hillsborough County (NH)

Meals on Wheels South Florida

Mississippi Association of Health Plans

National Adult Day Services Association

National Association of Dental Plans

National Association of Hispanic Nurses

National Association of Nutrition and Aging Services Programs

National Athletic Trainers' Association

National Hispanic Council on Aging

National Hispanic Medical Association

National Kidney Foundation

Nevada Asian American Native Hawaiian Pacific Islander Legislative Caucus

Nevada Association of Health Plans

Nevada Latin Chamber of Commerce

Nevada Latino Legislative Caucus

New Hampshire Association of Nurse Anesthesiology

New Jersey Chamber of Commerce

New Jersey State Nurses Association

New York Health Plan Association  
Northwell Health (NY)  
Partners in Care Foundation  
Partnership to Fight Chronic Disease  
Pennsylvania Chamber of Business and Industry  
Pennsylvania Homecare Association  
Point32Health  
Prevea Health (WI)  
Population Health Alliance  
Prominence Health Plan  
Rural Michigan Action Alliance  
Senior Helpers of Tempe (AZ)  
Senior Resource Alliance  
Silver Sneakers - Tivity Health  
SNP Alliance  
SummaCare (OH)  
Teachers' Retirement System of the State of Kentucky  
The Business Council of New York State, Inc  
The Chamber of Commerce for Greater Philadelphia  
The Chandler Chamber of Commerce (AZ)  
U.S. Chamber of Commerce  
Vancouver Clinic (WA)  
VillageMD  
Vivo  
VNS Health (NY)  
WomenHeart  
YMCA of Southern Nevada  
YMCA of the USA