

BETTER MEDICARE

ALLIANCE

February 27, 2026

The Honorable Mehmet Oz
Administrator
Centers for Medicare & Medicaid Services
200 Independence Avenue SW
Washington, DC 20201

Dear Administrator Oz,

On behalf of Better Medicare Alliance (BMA) and our coalition of ally organizations and beneficiaries, we thank CMS for its engagement with the Medicare Advantage community on the CY2027 Medicare Advantage and Part D Rate Notice.

BMA represents a diverse coalition of providers, community-based organizations, physician and nursing groups, health plans, employer groups, supplemental benefit partners, and beneficiary advocates committed to ensuring Medicare Advantage remains a high-quality, affordable option for more than 35 million beneficiaries who depend on the program.

Today, more than half of Medicare beneficiaries choose Medicare Advantage for its comprehensive benefits, improved health outcomes, and lower overall costs compared to traditional fee-for-service Medicare. Unlike the fragmented fee-for-service model that pays to treat illness after it occurs, Medicare Advantage emphasizes coordinated, preventive, whole-person care — helping seniors stay healthier and avoid unnecessary hospitalizations. By prioritizing prevention and proactive care management, Medicare Advantage delivers greater long-term value for taxpayers, ensuring every Medicare dollar works harder for seniors.

However, several consecutive years of inadequate funding and significant policy changes have created growing instability in the program. As a result, beneficiaries have experienced reduced benefits and higher costs, with median annual out-of-pocket maximums rising by nearly \$900 in just two years. At the same time, plan exits and market withdrawals have reduced coverage options nationwide. Just last year alone, nearly 3 million seniors were forced to find new coverage after their plans left the market.

This is not abstract policy — it is real disruption affecting seniors and families across the country. We appreciate CMS's continued efforts to strengthen Medicare Advantage. We are also encouraged that CMS leadership has acknowledged these challenges and underscored the need to restore stability and predictability to the Medicare Advantage program so it can continue delivering high-quality, affordable care. We are concerned, however, that the funding levels outlined in the CY2027 Advance Notice would undermine beneficiary affordability, program stability, and access to care at a moment when seniors are already under financial strain.

As proposed, the CY2027 Advance Notice would not be sufficient to meet rising medical costs and utilization in the Medicare Advantage program, further increasing pressure on beneficiaries¹. Independent analysis shows changes to the risk adjustment model would reduce payments to Medicare Advantage plans by an estimated \$27 per member per month — or \$324 per beneficiary annually —with certain states, including Florida, Georgia, Texas, Missouri, and Nevada, likely facing even steeper reductions.²

Providers would have fewer resources to sustain care coordination, manage complex patients, and participate in Special Needs Plans and value-based care models. Community-based organizations and supplemental benefit partners could see reduced support for services like transportation, nutrition and meal support, hearing, vision, dental, physical fitness, and in-home care—services that prevent costly hospitalizations. Medicare Advantage beneficiaries would see further decreased benefits, increased out-of-pocket costs, and fewer coverage choices to meet their needs.

Now is the time to promote stability in Medicare Advantage, the program that continues to deliver enhanced care coordination, better health outcomes, and greater value for both beneficiaries and taxpayers. Medicare Advantage has consistently demonstrated its ability to manage chronic disease and help seniors afford care on fixed incomes, delivering beneficiaries annual savings of \$3,486³ and care satisfaction rates over 95%⁴. Policies that weaken the program’s financial foundation risk moving it in the wrong direction: away from prevention and beneficiary-centered care.

We urge CMS to:

- **Revise rate levels** in the CY2027 Final Rate Notice to provide program stability for 35 million Medicare Advantage beneficiaries and the care partners who support them every day.
- **Exercise a cautious and phased approach to policy changes**, in collaboration with Medicare Advantage stakeholders, to avoid unintended disruptions to care.
- **Prioritize beneficiary access and affordability** in all final Rate Notice provisions.

We remain committed to partnering with CMS to strengthen Medicare Advantage and protect the seniors and families who rely on it.

Signed,

Better Medicare Alliance

Academy of Managed Care Pharmacy

Advocate Health Advisors

African American Male Wellness Agency

Alliance of Licensed Medicare Insurance Agencies

Alliance of Wound Care Stakeholders

America's Physician Groups

American Medical Group Association

AMGA

Asian & Pacific Islander American Health Forum

Association for Behavioral Health and Wellness

Austin Regional Clinic (TX)

Auxa Health

BlackDoctor

Blue Cross Blue Shield Association

BlueGenes

Boulder City Chamber of Commerce (NV)

Ceresti Health

ChenMed

Chicagoland Black Chamber of Commerce

Community Servings (MA)

Consumer Credit Counseling Services of the Mid Ohio Valley

Cottrell Family Chiropractic and Rehab (WV)

eHealth

El Paso Health (TX)

evolvedMD

Facing Hunger Foodbank

Family Health and Wellness Chiropractic

Fayette County Senior Center (IN)

Health Agents for America

Healthcare Leadership Council

HealthPlanOne

Healthy Aging Coalition

Healthy Insights

Healthy Places by Design

Hearing Loss Association of America

Indiana Association of Area Agencies on Aging

Jacobs and Crabtree Optometry (IL)

JustWell Health

Kansas Employers for Affordable Healthcare

Kansas Independent Business Association

Kentucky Association of Health Plans

Las Vegas Asian Chamber of Commerce

Las Vegas Latin Chamber of Commerce

Latin Chamber of Commerce

Loved Ones In-Home Care

MapHabit

Meals on Wheels America

Meals on Wheels of Hillsborough County (FL)

Medicaid and Medicare Advantage Products Association of Puerto Rico

Medical Care Multispecialty Practice

Medical Care, PLLC

Medicare A to Z

MediGold

Minnie Hamilton Health Systems (WV)

NAACP

National Adult Day Services Association

National Advisory Board on Improving Healthcare Services for Older Adults and People With Disabilities

National Association of Benefits and Insurance Professionals

National Association of Dental Plans

National Association of Hispanic Nurses

National Association of Nutrition and Aging Services Programs

National Black Nurses Association
National Hispanic Health Foundation
National Hispanic Medical Association
National Medical Association
National Patient Advocate Foundation
Nevada Chronic Care Collaborative
New Jersey Chamber of Commerce
New Jersey State Nurses Association
NEXUS Cardiac Rehabilitation
North East Medical Services
North Raleigh Chamber of Commerce
Northern Nevada Network
Partners in Care Foundation
Patient Advocate Foundation - Ohio Chapter
Pennsylvania Chamber of Business and Industry
Pennsylvania Council of Churches
Philadelphia Corporation for Aging
Point32 Health
Premier Health
Pretera Health Services
Prevea Health
Primary Care Associates
Public Sector HealthCare Roundtable
Putnam County Aging Program (WV)
Putnam County Health Department (WV)
Q&A Insurance Group
Quote Velocity
Schmidt Chiropractic (MN)

Sensorum Health
SOAR West Virginia
Stanly County Senior Center (NC)
Stanly County YMCA (NC)
SummaCare
Teachers' Retirement System of Kentucky
The Medicare Specialists
The National MLTSS Health Plan Association
The Vancouver Clinic
U.S. Chamber of Commerce
Vipercare Insurance Services (FL)
Vivo
VNS Health (NY)
West Virginia Behavioral Health Care Providers Association
West Virginia Center on Budget and Policy
West Virginia Women's Alliance
WomenHeart: National Coalition for Women with Heart Disease
YMCA of the USA

¹ BRG, 2027 Medicare Advantage Advance Notice Analysis, Available at: <https://media.thinkbrg.com/wp-content/uploads/2026/02/25112015/26-0224-BMA-2027-MA-Rate-Notice-Analysis-Final.pdf>

² Ibid.

³ Better Medicare Alliance, Medicare Beneficiary Spending 2025. Available at: <https://bettermedicarealliance.org/wp-content/uploads/2025/06/2025-Beneficiary-Spending-Report-2.pdf>

⁴ Better Medicare Alliance, Key Facts: State of Medicare Advantage 2025. Available at: <https://bettermedicarealliance.org/publication/key-facts-state-of-medicare-advantage-2025/>