

MEMORANDUM

To: Interested Parties
From: Rebecca Buck, Better Medicare Alliance
Re: MedPAC - with a grain of salt
Date: March 12, 2026

Today, MedPAC will release its March report to Congress on Medicare payments - and, as they have done previously, we expect MedPAC could raise concerns about Medicare Advantage payments relative to traditional Fee-For-Service Medicare. While their estimates can drive the policymaking discussion, it's important to remember that they are just that: estimates. And they don't tell the whole story.

In fact, CMS leaders recently published a rigorous [analysis](#) that raises serious questions about MedPAC's methodology and conclusions. The CMS analysis shows that coding intensity in Medicare Advantage relative to traditional Medicare is in reality much smaller than MedPAC represents: just 1.5-2%, compared to 10% previously estimated by MedPAC.

That is a major difference with significant implications for policymakers. As the Wall Street Journal editorial board [wrote recently](#) about MedPAC: *"The finding is notable because it calls into question MedPAC payment recommendations and black-box models."*

MedPAC exists to provide Congress with an independent assessment of the Medicare program, along with policy recommendations. But policymaking can only be as strong as the data underpinning it. And there are major flaws with MedPAC's methodology.

A [recent report](#) by Healthcare Leadership Council highlights that MedPAC's new methodology nearly quadrupled their estimate of Medicare Advantage "overpayments" in 2024 - without any change in the actual program. The report underscored how MedPAC's approach exaggerates Medicare Advantage spending by ignoring fundamental program differences, overstating coding intensity, and excluding most beneficiaries.

Put simply, MedPAC estimates do not accurately reflect Medicare Advantage spending, nor do they even attempt to capture the superior value of the program to beneficiaries and taxpayers. That is a problem.

As former HHS Secretaries Tommy Thompson and Donna Shalala [wrote recently](#), *"This narrative has put seniors' care at risk by driving policy decisions that threaten the very foundation of a program that works."*

MedPAC plays an important role in educating Congress about Medicare. But that role is only valuable when the underlying methodology holds up to scrutiny, and policymakers should be clear-eyed about what today's report represents: one data point among many, not the definitive last word.

That kind of nuance isn't convenient or easy. But a more rigorous approach is essential to see the full picture, protect beneficiaries, and put forward reforms that will actually strengthen Medicare

Advantage. We're invested in that work, and we look forward to continuing to bring new information, data, and analysis to help drive the best policymaking possible for beneficiaries.