



March 3, 2023

The Honorable Chiquita Brooks-LaSure
Administrator, Centers for Medicare & Medicaid Services
Department of Health & Human Services
200 Independence Avenue SW
Washington, D.C. 20201

Attention: CMS-2023-0010

Dear Administrator Brooks-LaSure:

I write on behalf of the Pennsylvania Chamber of Business and Industry (PA Chamber) regarding the CY 2024 Advance Notice for Medicare Advantage (MA). The PA Chamber is the largest board-based business association in Pennsylvania. Our nearly 10,000 members include employers across all industry sectors and all sizes throughout the Commonwealth. We appreciate the opportunity to submit these comments.

Health care policy is a key focus for the PA Chamber and our member-driven [Health Care Policy position statement](#) recognizes the ongoing struggle to manage the cost and complexity of health care coverage while striving to maintain high standards of quality and accessibility. As the policy states: “Balancing cost, quality and accessibility within the health care system remains a challenge for all stakeholders in the process, including government, insurers, providers, purchasers and consumers.”

Medicare Advantage was established to help stakeholders address this challenge by establishing a public-private partnership to expand and improve delivery of benefits and enhance efficiencies. Various types of MA stakeholders are part of the PA Chamber membership, including commercial health insurance carriers and employers who offer Employer Group Waiver Plans (EGWP).

More than 1.3 million Pennsylvanians – nearly half of all those eligible – have chosen Medicare advantage for their health care.¹ The program’s popularity in Pennsylvania is attributable in part to the considerable savings that Medicare Advantage beneficiaries enjoy relative to traditional Medicare beneficiaries.²

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

² Better Medicare Alliance, Study: Medicare Advantage Saves Seniors Nearly \$2,000 a Year Compared to FFS Medicare, <https://bettermedicarealliance.org/news/study-medicare-advantage-saves-seniors-nearly-2000-a-year-compared-to-ffs-medicare/>

Administrator Brooks-LaSure

March 3, 2023

Page 2

Proposals put forward in the Advance Notice may put this popular option out of reach for many in our state and could increase costs to employers who utilize EGWP to maintain their commitment of post-retirement benefits to their employees. According to a new study, the Advance Notice may increase premiums or reduce benefits by an average of \$540 per year per member.³ These costs would be significant for many Pennsylvanians living on fixed incomes who depend on Medicare Advantage and for employers who participate in EGWP.

I urge you to keep these concerns in mind as you consider finalizing the Advance Notice. Thank you for your consideration of these comments, and please feel free to reach me nlesher@pachamber.org should you have any questions.

Sincerely,



Neal Lesh
Director, Government Affairs

CC: PA Congressional Delegation
The Domestic Policy Council

³ Avalere Health, Proposed MA Payment Changes May Impact Premiums and Benefits, <https://avalere.com/insights/proposed-ma-plan-payment-changes-may-impact-premiums-and-benefits>