



February 28, 2023

Administrator Chiquita Brooks-LaSure
The Centers for Medicare & Medicaid Services
Department of Health and Human Services
P.O. Box 8016
Baltimore, MD 21244-8013

Submitted electronically via www.regulations.gov

RE: Advance Notice of Methodological Changes for Calendar Year (CY) 2024 for Medicare Advantage (MA) Capitation Rates and Part C and Part D Payment Policies

Dear Administrator Brooks-LaSure,

Wisconsin Manufacturers & Commerce (WMC) welcomes the opportunity to provide comments to the Centers for Medicare and Medicaid Services (CMS) CY2024 Advance Rate Notice. We are concerned about the drastic cuts proposed by CMS that would harm the ability for Wisconsin businesses to provide affordable and high quality health care coverage to their retirees.

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 manufacturer's 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.

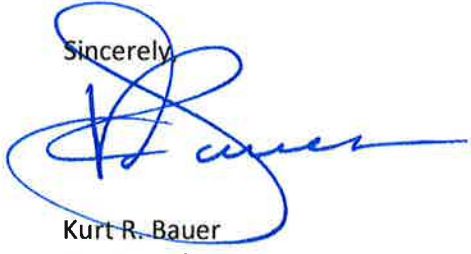
Medicare Advantage, a vital part of Medicare, is a popular health care option among retirees in the state. In our state, nearly half of all eligible enrollees, or more than 500,000 individuals, chose Medicare Advantage over Fee-For-Service (FFS) Medicare. This is because Medicare Advantage offers retirees access to quality, affordable health coverage that feels similar to the coverage they received during their time of employment. Medicare Advantage offers stability for our members and their retirees who are transitioning out of traditional employment. These cuts to Medicare Advantage would hurt Wisconsin businesses by undermining their ability to provide high quality, comprehensive and coordinated care to their retired employees.

Medicare Advantage beneficiaries enjoy the high quality, comprehensive care offered at a price they can afford. Medicare Advantage provides beneficiaries with more significant cost savings and a more comprehensive range of benefits than FFS Medicare. This includes better and more flexible vision, dental, and prescription coverage and supplemental offerings like medical appointment transportation and in-home care and services. Despite these additional benefits, beneficiaries, on average, save almost

\$2,000 annually through lower premiums and reduced out-of-pocket expenses compared to those enrolled in FFS Medicare. As we have seen food, gas, and other household expenses rise, Medicare Advantage premiums for 2023 have dropped by almost 8% compared to 2022. These cost savings are critical for Medicare Advantage beneficiaries who are on fixed-incomes.

All of these factors are why Medicare Advantage has a 94% approval rating among beneficiaries. Rather than cutting Medicare Advantage and putting the lives and health of Wisconsin's retirees in danger, WMC urges CMS to reconsider the current proposals and instead work to strengthen and improve Medicare Advantage so it can continue to provide affordable, high-quality healthcare to more than 30 million seniors, including more than 500,000 in Wisconsin, who depend on it.

Sincerely,

A handwritten signature in blue ink, appearing to read "K. Bauer", with a large, stylized loop at the beginning.

Kurt R. Bauer
President/CEO

Wisconsin Manufacturers & Commerce