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August 31, 2022

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

**Attn: CMS-4203-NC; Request for Information on Medicare Program –  
Medicare Advantage**

Dear Administrator Brooks-LaSure,

On behalf of the members of the Public Sector HealthCare Roundtable (the Roundtable) and the public sector employees, retirees, and their dependents they serve, we thank you for the invitation to provide our perspective on the Medicare Advantage (MA) program to inform potential future rulemaking.

The Roundtable is a non-profit, non-partisan coalition of public sector purchasers from across the U.S. including states, counties, and municipalities working together to bring a voice to the tens of millions of public sector employees, retirees, and their dependents they serve. Over 15 percent of the American workforce is employed by public sector entities and collectively they spend over \$43 billion annually on health care benefits, including prescription drug benefits, which serve as a critical component of state compensation systems.

The MA program has enabled our members to better serve their beneficiaries via Employer Group Waiver Plans (EGWPs), in particular. As you know, EGWPs ensure care coordination, Part D drug coverage, and stable benefits and premiums for millions of public sector retirees. As such, our members that utilize EGWPs consistently see high satisfaction rates among the public sector retiree beneficiaries to which they offer benefits.

Furthermore, many of the public sector retirees and dependents that our members purchase benefits for have limited budgets and/or fixed incomes. MA and particularly EGWPs have reduced the financial strain on public sector retirees who have spent decades serving in critical roles such as teachers, firefighters, law enforcement, and many other public sector professions in communities across the country.

Overall, MA beneficiaries spend \$2,000 less on out-of-pocket costs and premiums compared to those covered by traditional Medicare Fee-For-Service (FFS) plans, all while receiving additional benefits not available under FFS plans. As a result, changes to EGWPs have the potential to increase costs for our members' retired beneficiaries.

**Administration**

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In addition to lower costs, Roundtable members that partner with EGWPs ensure that carriers use the Medicare subsidy revenue to lower premiums, offer supplemental value-added benefits, perform care and case management, offer incentive wellness programs, and supply heightened customer service. None of these value-added benefits exists in original Medicare fee-for-service. Our members using EGWPs ensure that greater medical management strategies and programs are designed and utilized for more effective clinical intervention, coordinated care and member engagement. These benefits lead to better health outcomes for public sector retirees and their dependents and help keep health care costs down.

In sum, millions of retired Americans with fixed incomes have come to rely on the MA program to provide them with comprehensive health benefits at reasonable annual premium. We urge you to protect EGWPs to ensure retired public sector employees continue to have access to affordable and innovative health care benefits.

Thank you for the opportunity to respond to this important Request for Information. If you have any questions please reach out to Andrew MacPherson, Public Sector HealthCare Roundtable Senior Advisor, at [andrew@healthcareroundtable.org](mailto:andrew@healthcareroundtable.org).

Sincerely,



**Thomas R. Lussier**, *Administrator*  
Public Sector HealthCare Roundtable