



March 6, 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

Re: CMS-2023-0010, 2024 Medicare Advantage and Part D Advance Notice

Dear Administrator Brooks-LaSure:

Thank you for the opportunity to comment on the Centers for Medicare and Medicaid Services' CY 2024 Advance Notice. On behalf of the Pennsylvania Homecare Association (PHA), I am writing to express concern with the 2024 Advance Notice and its potential impact on seniors who rely on Medicare Advantage and its in-home support benefits.

PHA is a statewide organization of nearly 700 home health, home care, and hospice providers. PHA members provide quality care for their patients and clients and aim to serve as their advocates to ensure access to quality in-home care across the Commonwealth.

Medicare Advantage is a critical program to ensure high-quality, integrated care for Pennsylvania's seniors. As you know, the program has significantly increased the number of plans covering in-home support services, caregiver support, and home-based palliative care.¹

These supports are critical to many of the more than 1.3 million Pennsylvania seniors and individuals with disabilities who have chosen Medicare Advantage for their health care.² With the number of Americans over the age of 65 projected to nearly double over the next four decades, reaching 95 million by 2060,³ we cannot afford to jeopardize care for seniors.

Unfortunately, the implementation of the 2024 Advance Notice could undermine seniors' access to critical care. According to a recent study conducted by Avalere Health, policies proposed in the Advance Notice would result in an average of \$540 in increased premiums and/or reduced benefits for Medicare Advantage beneficiaries each year.⁴ We are concerned that this would put Pennsylvania's seniors at risk of no longer being able to afford their preferred Medicare Advantage plan or losing vital benefits.

¹ Better Medicare Alliance, Analysis: In-Home Support Benefits, Caregiver Support on the Rise in Medicare Advantage, 2022. Available at: <https://bettermedicarealliance.org/news/analysis-in-home-support-benefits-caregiver-support-on-the-rise-in-medicare-advantage/>

² Better Medicare Alliance, Medicare Advantage Enrollment Map, 2022. Available at: <https://bettermedicarealliance.org/medicare-advantage/about-medicare-advantage/medicare-advantage-enrollment-map/pennsylvania/districts/>

³ Better Medicare Alliance, State of Medicare Advantage, 2022. Available at: <https://bettermedicarealliance.org/wp-content/uploads/2022/11/BMA-State-of-MA-2022.pdf>

⁴ Avalere Health, Proposed MA Plan Payment Changes May Impact Premiums and Benefits, 2023. Available at: <https://avalere.com/insights/proposed-ma-plan-payment-changes-may-impact-premiums-and-benefits>

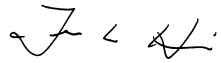
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PHA and its members are committed to advocating for Pennsylvania's seniors to ensure they receive the in-home care they need. We hope that CMS will fully assess the potential impacts of the 2024 Advance Notice on seniors before implementing program changes. We thank you for your consideration of our comments and look forward to working together to strengthen Medicare Advantage.

Sincerely,

A handwritten signature in black ink, appearing to read "Teri L. Henning".

Teri L. Henning, CEO
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cc: White House Domestic Policy Council