



National Hispanic Medical Association

March 6, 2023

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

Re: 2024 Advance Notice (CMS-2023-0010)

Dear Administrator Brooks-LaSure:

The National Hispanic Medical Association (NHMA) thanks you for the opportunity to submit comments on the Centers for Medicare & Medicaid Services' CY 2024 Advance Notice. NHMA is a non-profit association representing 50,000 licensed Hispanic physicians in the United States. We are dedicated to empowering Hispanic physicians to be leaders who will help eliminate health disparities and improve the health of Hispanics.

According to the U.S. Census, there are over 62 million Hispanics, accounting for approximately 19 percent of the total population. Hispanics have the highest uninsured rate among racial/ethnic groups at 20percent. Together, Black and Hispanic beneficiaries account for 18% of the total Medicare population. Half of Black (50%) and Hispanic (54%) beneficiaries were enrolled in a Medicare Advantage plan in 2018, as compared to just over one third of all White beneficiaries (36%). Moreover, we believe more Hispanics would sign-up with increased awareness of the program.¹

Medicare Advantage plays a critical role in advancing health equity by making quality health care affordable and accessible for Hispanic seniors across the country. According to a recent study, the proposals in the Advance Notice would lead to an average of \$540 in increased premiums or decreased benefits per Medicare beneficiary per year.² Therefore, we are concerned that policies put forth in the Advance Notice will harm many of our members' patients and lead to higher premiums or loss of benefits for Hispanic seniors.

Currently, more than half of Hispanic beneficiaries choose Medicare Advantage over traditional Medicare plans, because the plans are more affordable while offering a higher quality of care. The average monthly premium for Medicare Advantage plans reached a 15-year low of \$19 last year,³ and studies have found that Hispanic beneficiaries can save \$1,421 on average per year in

¹ Ochieng, N, Cubanski, J. Racial and Ethnic Health Inequities and Medicare. KFF. Feb 16, 2021

² Avalere, Proposed MA Plan Payment Changes May Impact Premiums and Benefits, 2023, <https://avalere.com/insights/proposed-ma-plan-payment-changes-may-impact-premiums-and-benefits>

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

out-of-pocket expenses compared to peers enrolled in traditional Medicare.⁴ Even with these savings, Medicare Advantage offers coverage for more services, like vision, dental and wellness programs. These added benefits are essential to improving health outcomes for Hispanic seniors, and they matter to our members who want to make sure their patients are receiving comprehensive and coordinated care.

Under your leadership, CMS has been focused on advancing health equity and addressing social determinants of health. NHMA and our members join you in this commitment. We look forward to working with you to strengthen programs like Medicare Advantage that help improve outcomes and advance health equity.

Thank you again for the opportunity to provide comments on the 2024 Advance Notice. I am happy to answer any questions and can be reached at nhma@nhmamd.org

Sincerely,



Elena V. Rios, MD, MSPH, MACP
President & CEO
National Hispanic Medical Association

⁴ Better Medicare Alliance, Study: Medicare Advantage Saves Seniors Nearly \$2,000 a Year Compared to FFS Medicare, 2022, <https://bettermedicarealliance.org/news/study-medicare-advantage-saves-seniors-nearly-2000-a-year-compared-to-ffs-medicare/>