



March 3, 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: CMS-2023-0010, 2024 Medicare Advantage and Part D Advance Notice***

Administrator Brooks-LaSure:

As the organization's President, I am writing on behalf of the Gerontological Advanced Practice Nurses Association (GAPNA) to provide comments on the Centers for Medicare and Medicaid Services' CY 2024 Advance Notice.

GAPNA is the premier professional organization that represents the interests of advanced practice nurses, other clinicians, educators, and researchers involved in the practice or advancement of caring for older adults. Our members are dedicated to the singular goal of providing excellent care for older adults through their work in academia, research, and a variety of clinical settings across the care continuum.

Approximately 50% of the Medicare eligible population nationwide is enrolled in Medicare Advantage, amounting to over 31 million older adults and individuals with disabilities. GAPNA's members understand the importance of supporting older adults, which includes the protection of their health care choices as well as their physical, social, and financial wellbeing. The Medicare Advantage program does just that – on average, it saves older adults nearly \$2,000 annually in out-of-pocket costs and provides critical supplemental benefits such as vision, dental, and hearing.<sup>1</sup>

The proposed changes to the Medicare Advantage program outlined in the CMS Advance Notice pose a serious threat to older adults and health care professionals serving this population. Proposed changes to risk adjustment are significant and would eliminate critical diagnoses codes, including those representing common chronic conditions experienced by the patients who GAPNA members care for.<sup>2</sup> Further, these proposed risk adjustment changes threaten the progress made in advancing health equity, preventing disease progression, and delivering high-value, high-quality care. The unintended consequences of this policy change would make caring for older adults more challenging – especially for those with complex health care needs.

Additionally, a recent study by Avalere Health indicates that proposed changes to Medicare Advantage could cost \$540 per beneficiary per year in increased premiums or decreased benefits.<sup>3</sup> This is deeply

concerning as these beneficiaries rely on these essential benefits and lower costs to manage their health.

GAPNA members are committed to making health care accessible and affordable for older adults nationwide. In its current state, the CMS Advance Notice runs counter to that goal. We urge the Centers for Medicare & Medicaid Services (CMS) to reconsider the implementation of the proposed risk adjustment changes until all stakeholders, especially the older adults we serve, can fully understand its impact. A thorough review of stakeholder input about these proposed changes is essential, especially considering the 31 million older adults who may be negatively impacted by these changes.

Sincerely,

A handwritten signature in black ink, appearing to read 'JKim', written in a cursive style.

Jennifer Kim, DNP, GNP-BC, GS-C, FNAP, FAANP  
President  
Gerontological Advanced Practice Nurses Association