



September 10, 2019

Ms. Seema Verma, Administrator
Centers for Medicare and Medicaid Services
Department of Health & Human Services
200 Independence Ave., SW
Washington, D.C. 20201

Dear Administrator Verma,

We are writing to express our concerns regarding the newly launched Medicare Plan Finder. The California Collaborative for Long Term Services and Supports (the Collaborative) represents 39 organizations that advocate or provide essential services for older Californians, people with disabilities, and caregivers most of whom are Medicare beneficiaries.

Making a decision regarding one's Medicare coverage is a complicated and often confusing process that requires the consideration of many factors. The provision of individual benefit and coverage counseling and assistance navigating choices as provided by the State Health Insurance and Assistance Programs (SHIPs), known in California as the Health Insurance and Advocacy Programs (HICAPs), is critical.

It has come to our attention that the new Medicare Plan Finder, as it is currently designed, risks making it more difficult for Medicare beneficiaries to make timely decisions regarding their Medicare coverage. We have outlined our concerns below in more detail.

- **Log-In.** The new plan finder requires beneficiaries for the first time to set up a log-in/password to conduct a personalized plan search or comparison. We are concerned that beneficiaries who are not technologically savvy will have difficulty accessing the plan finder as well as the many Medicare beneficiaries who have sensory and cognitive disabilities. In addition, if they do successfully access the plan finder, making these personalized choices electronically could potentially risk-disruptions in their care and/or access to needed prescription drugs.
- **Privacy.** Because the new plan finder requires beneficiaries to establish a Medicare.gov account, more beneficiary information will be viewable by anyone who assists in establishing the mymedicare.gov account and/or who helps with enrollment decisions. This risk provides more opportunities for bad acting insurance brokers and agents and others to engage in fraudulent practices.
- **Resources.** We are concerned that some changes to the plan finder will increase the amount of time HICAPs will need to effectively assist beneficiaries. For example, the new plan finder does not save prescription entries when doing a general search. Repeated entries will therefore be required. General searches will not save Rx entries, so repeated entries will be required (as needed) when not doing a personalized search. SHIP/HICAP counselors will also likely have to spend additional time helping beneficiaries reset their mymedicare.gov accounts due to forgotten login information.

We ask that CMS consider resolving these concerns by providing special access to SHIP/HICAP counselors to process plan comparison searches without going through the myMedicare.gov process. In addition, designing a “save” mechanism for prescription drug entries would help to reduce unnecessary and time-consuming reentry of prescription drugs. We also ask that CMS closely monitor the roll out of the Medicare Plan Finder and do affirmative outreach to SHIP/HICAP counselors to learn of any on-the-ground issues counselors are facing during the fall open enrollment period. If CMS learns of any issues, it should provide for special enrollment periods or other enrollment relief to ensure beneficiaries are not negatively impacted.

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Amber C. Christ". The signature is fluid and cursive, with the first name "Amber" being more prominent and the last name "Christ" following in a similar style.

Amber C. Christ, JD
Vice Chair for Policy
California Collaborative for Long Term Services and Supports

Cc: Mary Lazare, Principal Deputy Administrator, Administration for Community Living; Denise Crandall, SHIP Director, California Department of Aging