

October 13, 2023

The Honorable Chiquita Brooks-LaSure  
Administrator  
Centers for Medicare and Medicaid Services  
Hubert H. Humphrey Building  
200 Independence Avenue, S.W.  
Washington, D.C. 20201

*Sent via email*

Dear Administrator Brooks-LaSure:

We are a group of aligned organizations that support efforts to integrate Medicare and Medicaid for the dual-eligible population. We focus this letter on important changes that we believe need to be made to the Medicare Plan Finder to increase its utility for people who are dual eligible. As you know, people who are dual eligible have more complex coverage decisions and options than people who are only on Medicare. Plan Finder is a tool that can assist people with their decision-making, but it needs improvements to be most useful to this population.

We recommend prioritizing the following changes to make it easier for people to understand their coverage options, including those coverage options that have specifically been built to work with their Medicaid coverage for next year (i.e., the 2025 Open Enrollment Period):<sup>1</sup>

**Medicare Plan Finder's default display should list D-SNPs first for people who are dual-eligible.**

Today, Medicare Plan Finder's default is to sort plans based on premium price, even for people who are dual-eligible and pay little to no premiums thus price is irrelevant. Instead, we recommend that Plan Finder prioritize D-SNPs by level of integration with Medicaid in the search function for people who are dual eligible and note the level in which the plan is integrated with Medicaid (e.g., a D-SNP that is able to be fully integrated with Medicaid).

***Medicare Plan Finder should provide a more complete picture of the benefits available to people who are dual eligible.*** Dual-Eligible Special Needs Plans (D-SNPs) are dedicated to serving people who are dual-eligible. As a result, these plans ideally organize their supplemental benefits around the Medicaid benefits available through the state. For example, rather than offering transportation or dental which are commonly covered by a state's Medicaid program, a D-SNP may prioritize meals or additional in-home support services. However, the impact of this strategy is that the D-SNP may appear less attractive than a general Medicare Advantage plan because a person who is dual-eligible may really value transportation and dental, for example, and do not understand that those benefits may already be covered through their Medicaid coverage. We encourage the Center for Medicare to implement improvements to its Plan Finder tool that would allow people who are dual-

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<sup>1</sup> Sarah Rosenblum. [Two Ways CMS Can Meaningfully Improvement Medicare Plan Finder for People Who Are Dual Eligible](#). ATI Advisory. October 5, 2023.

eligible to understand a fuller picture of the benefits they would receive with each plan, inclusive of Medicaid benefits.

Additionally, other possible changes our organizations identified to improve the Medicare Plan Finder for people who are dual eligible include:

- On the “Help with your costs” page, allow users to select multiple options. Many people are eligible for multiple programs listed, like both Medicaid and the Medicare Savings Program. Forcing users to select only one option is both confusing and leads users to question the validity of their plan results.
- Making it clearer to users that when they Filter to view “Plans for people who have both Medicare and Medicaid,” they are seeing all available Medicare Advantage plans *in addition* to D-SNPs. Currently, all the other filters available on the Medicare Plan Finder plan results page remove plan options; it is confusing that this filter is the only one that *adds* options.
- If a user selects that they receive help with costs from another program (e.g., the Medicare Savings Program), the costs shown on the plan results page should reflect this help. For example, currently, if a user selects that they are enrolled in the Medicare Savings Program, Medicare Plan Finder still shows Part B premiums on the results page, which a beneficiary is not responsible for.

Thank you in advance for your consideration of these points. We are more than happy to meet with you to discuss these recommendations and answer any questions you may have. Please reach out to Amy Abdnor at [aabdnor@arnoldventures.org](mailto:aabdnor@arnoldventures.org) with any questions.

Sincerely,

Association for Community Affiliated Plans  
Arnold Ventures  
Community Catalyst  
Justice in Aging  
Medicare Rights Center  
National Association of State Directors of Development Disabilities Services  
National Council on Aging  
SNP Alliance