



266 West 37th Street, 3rd Floor
New York, NY 10018
212.869.3850/Fax: 212.869.3532

September 18, 2019

Seema Verma
Administrator, Centers for Medicare & Medicaid
U.S. Department of Health and Human Services
200 Independence Avenue, SW
Washington, DC 20201

Dear Administrator Verma:

On behalf of the Medicare Rights Center, I am writing to applaud CMS's efforts to redesign Medicare Plan Finder (MPF) and to highlight opportunities to further improve the tool before the upcoming Fall Open Enrollment period begins on October 15.

Medicare Rights is a national, nonprofit organization that works to ensure access to affordable health care for older adults and people with disabilities through counseling and advocacy, educational programs, and public policy initiatives. Medicare Rights provides services and resources to three million people with Medicare, family caregivers, and professionals each year.

Based on this experience, we know that for many people with Medicare, evaluating health care and prescription drug coverage options can be a daunting task. Not only is the plan selection process dizzyingly complex, but the federal government's primary enrollment assistance tool—MPF—has long needed updating.

Though MPF was developed to help consumers view, compare, and select Medicare Advantage and Part D plans, we frequently hear from older adults and people with disabilities who are struggling to use the tool or understand its results. Some may be having access or technical problems, while others may not know how to conduct a search or what to do with the generated information.

Accordingly, we were pleased to learn that the tool would be undergoing a comprehensive modernization. Unveiled last month, the new MPF features an improved overall design, presents information in a way that more closely aligns with the consumer decision-making experience, and seems to lay the groundwork for future updates and enhancements. Medicare Rights has consistently advocated for these reforms and we are pleased to see them incorporated in the redesigned tool.

We have also identified several opportunities for CMS to further strengthen MPF prior to this year's Fall Open Enrollment period. These observations, detailed in the pages that follow, focus on changes that are urgently needed to maximize the tool's clarity, accuracy, and functionality. Among our key recommendations are to:

- Allow users to sort drug plans by the “total drug cost” for the plan year;
- Add formulary information in the summary view, and the ability to sort or filter plans according to this data point; and
- Correct the misleading explanation and placement of the section on “Additional” and “Extra” benefits.

Thank you for your consideration. We look forward to continuing to work together to ensure all people with Medicare have the tools and resources they need to make informed coverage decisions.

Sincerely,

A handwritten signature in cursive script that reads "Fred Riccardi".

Frederic Riccardi
President
Medicare Rights Center

cc: Demetrios Kouzoukas, Principal Deputy Administrator & Director, Center for Medicare