



National Association of Insurance
and Financial Advisors

September 3, 2019

Seema Verma, Administrator
Centers for Medicare & Medicaid Services
7500 Security Boulevard
Baltimore, MD 21244-1850

Dear Administrator Verma:

Re: CMS Changes to the Medicare Plan Finder Platform

Dear Administrator Verma:

The National Association of Insurance and Financial Advisors (“NAIFA”) submits the following comments regarding forthcoming changes to the Medicare Plan Finder (MPF) from the Centers for Medicare and Medicaid Services (CMS). While we commend CMS for moving to address the shortcomings with the MPF as identified in a recent report from the Government Accountability Office¹, we are still concerned that the changes CMS is working to implement are too abrupt and could potentially risk individuals’ security of personal information. We hope that CMS will consider NAIFA as a resource to help ensure a seamless transition to the new MPF format if necessary.

Founded in 1890 as The National Association of Life Underwriters (NALU), NAIFA is the oldest, largest and most prestigious association representing the interests of insurance professionals from every Congressional district in the United States. NAIFA members assist consumers by focusing their practices on one or more of the following: life insurance and annuities, health insurance and employee benefits, retirement planning, multiline, and financial advising and investments. NAIFA’s mission is to advocate for a positive legislative and regulatory environment, enhance business and professional skills, and promote the ethical conduct of its members.

Among the new changes to the MPF system, CMS intends to dispense with a feature that enables agents and brokers to enter a client’s list of prescription drugs to generate a tracking number that produces a list of plan options that cover the costs of those prescriptions. We understand that CMS seeks to change this system by requiring enrollees to use their own Medicare identification credentials rather than permit the use of tracking numbers when using the MPF service to

¹ <https://www.gao.gov/products/GAO-19-627>

determine the best Medicare plan in which they should enroll. We believe such a change may increase the risk that a client's privacy and online security could be compromised as using the Medicare identification credentials may contain an enrollee's personal information, unlike the tracking numbers which do not indicate any information that can be connected to the client. Preserving the tracking number feature is critical to ensuring that a client's sensitive personal and financial information are not jeopardized. If not already done, we hope that CMS will quickly institute measures to secure and protect a consumer's information when utilizing the revamped MPF service.

In addition to the privacy and security concerns, many agents have noted that adapting to the changes CMS will make could result in agents and brokers and their clients spending a very considerable amount of time re-entering a client's prescription drug list and other information into the new online format. One of our association members reported that these CMS changes will affect thousands of his clients, many of whom take 5-10 prescription medications, and re-entering this information into the system will certainly be very time consuming. This may unnecessarily lead to delays in the client discussing with their advisor the best Medicare plan option to select. It is our understanding that CMS aims to avoid requiring clients to re-enter their prescription drug information which we believe is encouraging, and we appreciate CMS working to address this issue affecting consumers and agents.

Recognizing the challenges of learning a new and updated system, we remain concerned that changes of this significance are occurring rather soon and before October when Medicare enrollment is typically at a high level. We note that other stakeholders have also made public comments expressing a similar view that the time frame by which CMS seeks to implement changes to the MPF system may be too soon². Still, we are aware that CMS is in the process of moving forward with the MPF system changes and we certainly hope the transition is successful.

On a related matter, we are troubled at some language on the site of one of the Blue Button app vendors which appears to unfairly discourage enrollees from seeking advice from licensed and professional agents and brokers. This vendor makes the following statements³: "*Some brokers may only show you some of the plans available to you,*" and "*many brokers bombard you with emails, calls, and pushy sales scripts.*" NAIFA finds this text to be offensive and incorrect. We realize that CMS is aware of the vendor's statements and is conducting a review of this vendor which is a positive development from our perspective. When undergoing CMS training and certification, agents and brokers are instructed not to direct a client to a certain product but rather to educate the client and allow him or her to select the policy the client believes is most suitable and appropriate.

Importantly, the role of the agent is critical and must be preserved and not diminished. As NAIFA members have reported to us, many of their clients seeking assistance in selecting the most suitable Medicare plan are most often older individuals who generally are not

² <https://www.reuters.com/article/us-column-miller-medicare-column/column-u-s-medicare-readies-new-plan-shopping-website-but-timing-prompts-concerns-idUSKCN1VC2GQ>

³ <https://www.enrollhero.com/bluebutton/>

technologically savvy and some even do not utilize internet services. Agents and brokers help their clients navigate the technical aspects of applying online for Medicare coverage as well as understating the complexities of Medicare plan selection.

Advisors play a critical role in providing local, personalized and cost-effective services throughout the life of a policy. This may involve substantial research and fact-finding about the client's needs. Agents educate clients by explaining the various plans available and provide cost estimates. Agents make specific recommendations that suit the client's objectives and budget, and they encourage the client to act in a timely fashion to assure that the proper coverage is in place for when needed. Agents also review coverage on a periodic basis, suggest changes when appropriate and counsel clients on ways to reduce costs. Agents assist with claims, answer questions and serve as ombudsmen in helping their clients deal with insurance carriers. Agents often spend an enormous amount of time helping clients assemble the proper documentation needed to file or follow up on a claim. This is *especially* true with seniors who receive Medicare benefits. Enrollees should be encouraged to seek the counsel of an agent or broker specializing in Medicare plans to ensure that the enrollee is selecting the policy that meets the client's medical and financial needs.

NAIFA hopes that the transition to the new MPF system is successful and our members will certainly work to assist their clients in navigating the new platform and viewing the coverage options available. We do hope that going forward CMS will consider engaging extensively with the agent and broker community to "beta test" projects of this nature to determine if a revised system can be successful and therefore continue to serve as a beneficial tool for consumers as well as agents and brokers in assisting their clients.

We thank you for your time and consideration of our views and for working to improve the MPF system. We also stand ready to offer any input from our members, especially those who underwrite a considerable amount of Medicare coverage. If you have any questions about our comments or need more information, please contact Steve Kline, NAIFA Director of Government Relations at (703) 770-8187 or skline@naifa.org

Sincerely,



Jill M. Judd, LUTCF, FSS
NAIFA President

