



September 11, 2024

Ms. Chiquita Brooks-LaSure
Administrator
Centers for Medicare & Medicaid Services
Department of Health and Human Services
P.O. Box 8013
Baltimore, MD 21244

Dear Administrator Brooks-LaSure:

On behalf of the National Association of Insurance and Financial Advisors (“NAIFA”), I would like to express our strong concern with the recent decision by certain health insurance companies to discontinue Medicare prescription drug (Part D) compensation for health insurance agents. The announced changes will have a detrimental impact on the American consumers who will potentially lose access to the personalized guidance that agents provide. And the agents themselves will be restricted from receiving compensation for both new business and renewals when assisting clients with prescription drug plan enrollment.

Medicare Part D plans are sophisticated products that can be difficult for many Medicare beneficiaries to fully understand. NAIFA members spend a considerable amount of time each year, especially during the Annual Enrollment Period, matching beneficiaries to the prescription drug plan that best fits their specific needs. Additionally, because Medicare can be much more complex than commercial insurance, many consumers need assistance throughout the year as they move through the various phases of coverage, cost determinations, and new prescriptions, all of which are services that agents provide on a continual basis. Eliminating agent compensation for these plans creates a risky precedent that may lead to consumers being left without personalized assistance as the agent cannot help with any issues that may arise. Without professional agent assistance, consumers will be confused and left to contact calls centers unfamiliar with their unique situations. Frustrated consumers are more likely to submit their complaints and concerns directly to Medicare, placing added stress on CMS’s ability to deal with calls and inquiries in a timely fashion.

NAIFA’s members currently serve as important agents of record for Medicare beneficiaries, giving them the ability to handle policy inquiries, renewals and modifications; insurance quotes; contracts and communications; and benefits administration, among other essential functions. Agents should continue having the ability to serve as the agent of record if that is the beneficiary’s preference, a



protection that is now at risk with these companies' plans in effect. Without the agent of record designation, agents lose the ability to act on behalf of beneficiaries without their direct involvement, creating logistical difficulties that can potentially lead to a delay in care and service.

NAIFA is dedicated to ensuring that consumers have access to financial professionals for personalized assistance with their insurance needs. Fairly compensated health insurance agents provide a critical resource that allows Medicare beneficiaries to fully understand the insurance plans in which they are enrolled by providing a host of substantive and administrative support that beneficiaries cannot find elsewhere. NAIFA believes recent decisions by health insurance companies will have the unfortunate impact of reducing consumer access to personalized support and result in some beneficiaries enrolling in plans that do not best fit their healthcare needs.

NAIFA would like to continue the conversation with the Centers for Medicare and Medicaid Services to communicate the implications of approving these prescription plans that will curtail personal service and offer solutions to protect our most vulnerable citizens.

If you should have any questions or require additional information, please do not hesitate to contact Michael Hedge, NAIFA's Senior Director of Government Relations at mhedge@naifa.org.

Sincerely,

A handwritten signature in black ink, appearing to read "Kevin Mayeux".

Kevin Mayeux, Esq., CAE, CRMA
Chief Executive Officer
National Association of Insurance and Financial Advisors