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## Determining beneficiary premiums

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Under the current system, beneficiaries choose between FFS and MA plans to receive Medicare benefits. (Beneficiaries in ACOs are part of FFS.) The two models can look very different in terms of premiums, benefit design, and choice of providers. To encourage beneficiaries to choose the model that gives them the highest value in terms of cost and quality, the Commission believes that the Medicare program should not subsidize one choice more than another. In other words, the federal contribution toward the cost of Medicare benefits should be equal for FFS and MA in each market.

To examine how different approaches to calculating beneficiary premiums could influence a beneficiary's choice between FFS and MA, we considered different ways to set beneficiary premiums using projected FFS spending data and MA plan bids for 2015.<sup>7</sup> In our analysis, we defined a market area, calculated each market's projected FFS spending, and recalculated each market's MA plan bids from service-area bids. For simplicity, all FFS spending and MA plan bids in our analysis were expressed as per

beneficiary per month amounts and standardized for a beneficiary of average health status. Moreover, we assumed that quality was constant across models.<sup>8</sup>

## Definition of market areas

For our analysis, we wanted to define market areas that best matched insurance markets served by private plans. Using market areas that are too small can result in many areas with a small number of FFS beneficiaries, and there can be instances of adjacent areas with very different levels of FFS spending. However, if a market area is too large, the cost of serving beneficiaries can vary widely within the area. Accordingly, we adopted a definition of market areas that is larger than the county definition currently used in the MA program.<sup>9</sup>

- In urban areas, we used collections of counties located in the same state and the same CBSA, which is a collective term for metropolitan (50,000 or more in population) and micropolitan (10,000 to 49,999 in population) areas. (Each area consists of one or more counties and includes the counties containing the core urban areas as well as any adjacent counties that have a high degree of social and economic integration with the urban core.)
- Among counties outside CBSAs, we used health service areas (HSAs) as defined by the National Center for Health Statistics. (HSAs consist of collections of counties where most of the short-term hospital care received by beneficiaries living in those counties occurs in hospitals in the same collection of counties.)

The data used in our analysis included 1,231 market areas in the 50 states and the District of Columbia.

## Average FFS spending per beneficiary in market areas

To calculate a beneficiary premium for FFS Medicare in a given market area, we determined the equivalent of an FFS "bid" based on the area's FFS spending. To calculate FFS spending that is comparable with MA plan bids for 2015, we used the projected average monthly FFS spending per beneficiary for 2015, excluding hospice, direct graduate medical education, and indirect medical education payments.<sup>10</sup> The calculation was standardized for a beneficiary of average health status. Market-area average spending was calculated from county-level FFS spending weighted by the area's number of FFS beneficiaries as of January 2015.

**TABLE  
1-2**

**Distribution of market areas  
by average monthly FFS spending  
per beneficiary, 2015**

Average monthly FFS spending per beneficiary	Number of market areas	Share of beneficiaries
\$537–\$600	32	2.3%
\$600–\$700	462	23.3
\$700–\$800	524	44.7
\$800–\$900	183	25.9
\$900–\$1,151	30	3.8
Overall average (\$752)	1,231	100

Note: FFS (fee-for-service). FFS spending for 2015 is projected and excludes hospice, direct graduate medical education, and indirect medical education payments. FFS spending is per month per beneficiary and standardized for a beneficiary of average health status. Market areas consist of core-based statistical areas and health service areas in 50 states and the District of Columbia. Number of Medicare beneficiaries is as of January 2015.

Source: MedPAC analysis of Medicare Advantage (MA) plan bids for 2015 and MA enrollment data for January 2015.

Table 1-2 shows the distribution of market areas by average monthly FFS spending per beneficiary for 2015, ranging from \$537 to \$1,151. About a quarter of beneficiaries lived in areas with FFS spending below \$700 a month; about 45 percent in areas with spending between \$700 and \$800 a month; and about 30 percent of beneficiaries in areas with FFS spending above \$800. Across the market areas in our analysis, the average monthly FFS spending was \$752.

**Adjusting MA plan bids for market areas**

Under current law, MA plans are required to cover all Medicare Part A and Part B benefits except hospice (see text box on the MA payment model, p. 8).<sup>11</sup> For each county, CMS sets the MA benchmark. This local MA benchmark represents a bidding target and is set using statutory formulas and adjusted for the plan’s quality ranking. Because under current law MA benchmarks are increased relative to local FFS spending in low-spending areas and decreased in high-spending areas, there is less variation in MA benchmarks than in FFS spending across areas. Furthermore, current MA plan bids are clustered around MA benchmarks, and as a result, there is less variation in MA plan bids than in FFS spending across areas.

Given the local MA benchmark, each MA plan selects counties that make up its service area and submits a bid for the service area.<sup>12</sup> The plan’s bid reflects its costs to provide the Part A and Part B benefit package for a beneficiary of average health status and includes plan administrative cost and profit.<sup>13</sup> In our analysis, MA plan bids are monthly amounts for the Part A and Part B benefit portion only and are standardized for a beneficiary of average health status. Because the current MA plan bids are for plan-defined service areas, we made the following assumptions in our analysis in converting plans bids at the service-area level to plan bids at the market-area level.

- We assumed that plan bids were constant over the entire plan-defined service areas, where service areas can be larger or smaller than market areas.
- We assumed that if a plan was offered to at least half of the market area’s Medicare beneficiaries, the plan would serve the entire market area with its current bid. If the plan was not offered to at least half of the area’s beneficiaries, we assumed that it would not bid to serve that market area.
- We excluded bids for plans in market areas with little or no projected enrollment—defined in our analysis as fewer than 100 projected enrollees in the market area—because those bids would not reflect costs for those areas.
- We excluded plans that were not open to all of a service area’s beneficiaries, such as employer-sponsored plans and special needs plans. We also excluded private FFS plans.

The number of MA plan bids varied across market areas in our analysis (Table 1-3). About 8 percent of beneficiaries had only one or two MA plans available to them. However, the vast majority of beneficiaries had at least 3 MA plans available in their market areas, and more than 20 percent had more than 20 MA plans available.

**Illustrative examples for calculating beneficiary premiums**

Under current law, there is no premium for Part A for beneficiaries entitled to Medicare who receive Social Security or Railroad Retirement Board benefits or are entitled to Medicare because they have end-stage renal disease.<sup>14</sup> All beneficiaries who elect Part B pay a base premium for that coverage, set at about 25 percent of Part B national average benefit costs per beneficiary; conversely, the government’s subsidy equals 75 percent of

**TABLE  
1-3**

**Distribution of market areas by number of MA plan bids in market area, 2015**

Number of plan bids in market area	Number of market areas	Share of beneficiaries	Average FFS spending per beneficiary	Average MA penetration rate (in percent)
1 to 2	294	8.0%	\$748	15.3%
3 to 5	358	15.1	722	21.1
6 to 10	204	21.2	730	29.4
11 to 20	114	31.1	750	33.7
More than 20	30	21.8	813	43.0

Note: MA (Medicare Advantage), FFS (fee-for-service). FFS spending for 2015 is projected and excludes hospice, direct graduate medical education, and indirect medical education payments. FFS spending and MA plan bids are per month per beneficiary and standardized for a beneficiary of average health status. Market areas consist of core-based statistical areas and health service areas in 50 states and the District of Columbia. Number of Medicare beneficiaries and MA enrollees are as of January 2015. "Share of beneficiaries" does not sum to 100 percent because, out of 1,231 market areas in our dataset, 231 market areas have no plan bids due to exclusions of certain MA plans.

Source: MedPAC analysis of MA plan bids for 2015 and MA enrollment data for January 2015.

the Part B costs. The base Part B premium is set nationally and does not vary across areas.<sup>15</sup>

In other words, beneficiaries in the traditional FFS program pay the same Part B premium in any area of the country. In contrast, MA enrollees' premiums vary, depending on how plan bids compare with the local MA benchmark. If plan bids are higher than the benchmark, MA enrollees pay both the Part B premium plus the difference between the bid and the benchmark as an additional MA premium. If plan bids are lower than the benchmark, beneficiaries receive the difference in extra benefits and premium rebates, including in some cases a reduced Part B premium. (Most MA plans tend to offer extra benefits rather than premium reductions.)

Applying the current-law method for calculating the base Part B premium to our data—25 percent of Part B spending per beneficiary—results in a base FFS premium of \$101 per month. This amount represents about 13.4 percent of average combined Part A and Part B FFS spending per beneficiary—and an implied government subsidy rate of 86.6 percent of combined Part A and Part B spending.<sup>16</sup> Our calculated base premium of \$101 per month is lower than the actual Part B premium for 2015 of \$104.90 per month, but this difference is to be expected given the adjustments we made in calculating FFS spending in our data.

We examined other ways to calculate beneficiary premiums in the context of synchronizing Medicare policy. For illustrative purposes, we considered three approaches that differed in (1) the base premium charged,

and (2) which Medicare option the beneficiary can buy for the base premium. Under all three examples, beneficiaries may choose an option other than the one the base premium pays for. In that case, individual beneficiaries' total premiums equal the base premium plus the difference between the option they choose and the option the base premium pays for. Two of the following designs had a base premium set as a share of national average FFS spending and one had a base premium set as a share of local average FFS spending:

- **Example 1:** The base premium is set at 13.4 percent of the *national* average FFS spending and pays for FFS Medicare in every market. Under this approach, the premium for beneficiaries choosing an MA plan in their market area equals the base premium plus the difference between the plan bid and their market area's average FFS spending.
- **Example 2:** The base premium is also set at 13.4 percent of the *national* average FFS spending but then pays for *either* FFS Medicare or the reference MA plan—whichever costs less—in each market. Under this approach, if FFS spending is lower than the MA bid, the base premium pays for FFS Medicare. But if FFS is higher than MA, the base premium pays for MA, meaning that the Medicare option the base premium pays for would vary across market areas, depending on how FFS spending compares with MA.
- **Example 3:** The base premium is set at 13.4 percent of the *local* average FFS spending and pays for *either* FFS Medicare or the reference MA plan—whichever

**TABLE  
1-4****Three illustrative examples for calculating beneficiary premiums**

Illustrative example	Base premium	What base premium pays for
<b>Example 1</b> <b>National</b> base premium pays for FFS in every market	13.4% of national FFS	FFS Medicare in every market area
<b>Example 2</b> <b>National</b> base premium pays for lower of local FFS or reference MA bid in each market	13.4% of national FFS	FFS Medicare or reference MA plan, whichever costs less
<b>Example 3</b> <b>Local</b> base premium pays for lower of local FFS or reference MA bid in each market	13.4% of local FFS	FFS Medicare or reference MA plan, whichever costs less

Note: FFS (fee-for-service), MA (Medicare Advantage). In our three examples, we assume that the base premium is set to 13.4 percent of the Medicare Part A and Part B benefit cost, which represents 25 percent of the overall Part B share of the benefit cost. The government subsidy is then 86.6 percent of the benefit cost.

costs less—in each market. Under this approach, in markets where the local FFS spending is lower than the national average FFS spending, the base premium would be lower than the nationally set base premium, whereas in markets where local FFS spending is higher than the national average FFS spending, the opposite would be true. Table 1-4 summarizes these examples.

The examples differ from current law in several aspects. For instance, MA benchmarks would no longer be set administratively. Instead, FFS spending and MA plan bids would determine the reference point for the federal contribution and beneficiary premium.

**TABLE  
1-5****Per beneficiary FFS spending and plan bids in selected market areas, 2015**

	Market area		
	Portland, OR	Columbus, OH	Miami-Dade, FL
Number of Medicare beneficiaries (in thousands)	283	287	419
<b>Average monthly FFS spending</b>	<b>\$626</b>	<b>\$722</b>	<b>\$1,151</b>
Number of MA plan bids	23	16	27
MA penetration rate	57%	46%	62%
Range of MA plan bids			
Lowest bid	\$607	\$614	\$572
25th percentile bid	688	659	697
<b>Median bid</b>	<b>703</b>	<b>659</b>	<b>743</b>
75th percentile bid	736	713	816
Highest bid	783	874	956
Number of counties in area	5	10	1

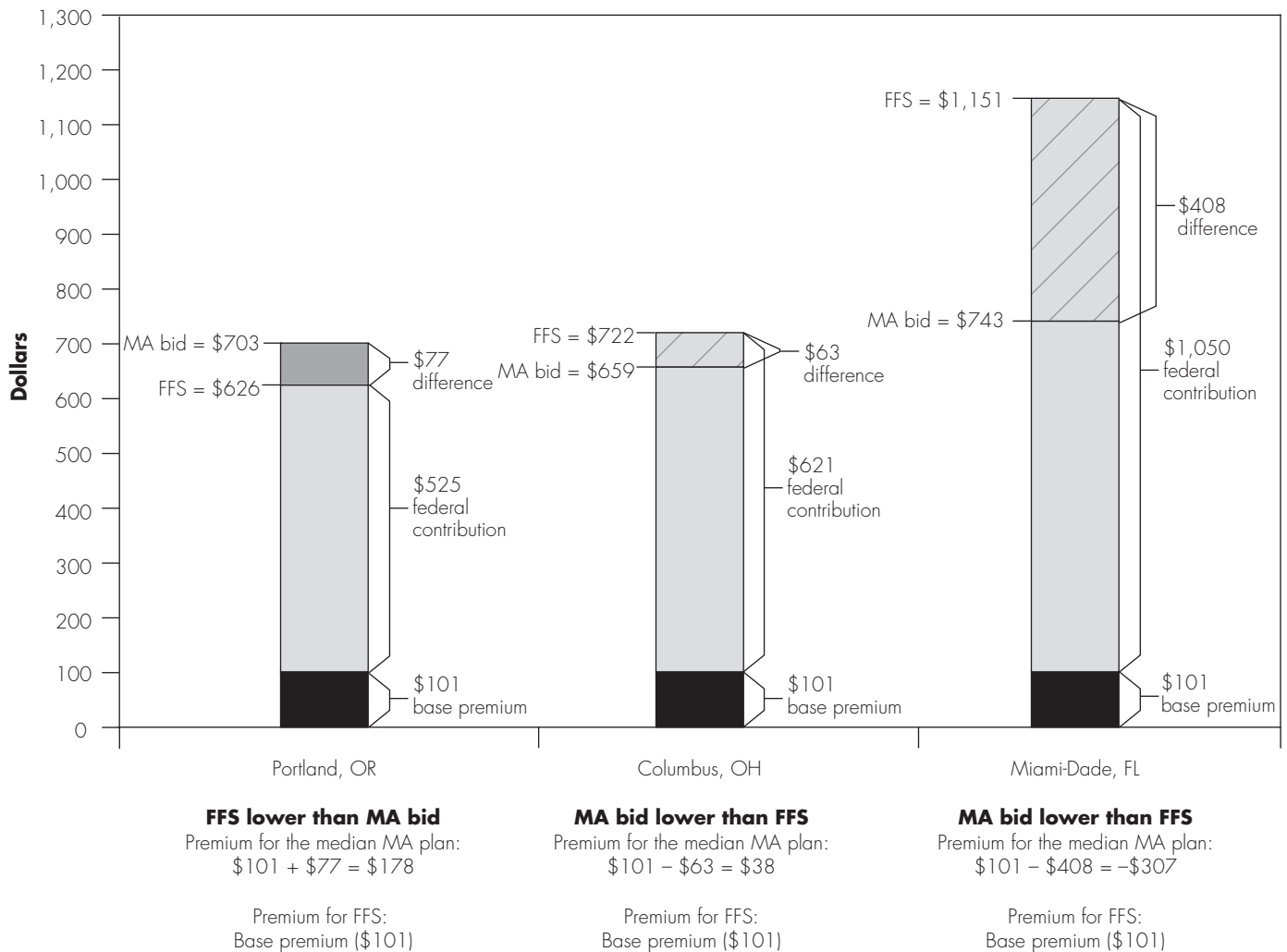
Note: FFS (fee-for-service), MA (Medicare Advantage). FFS spending for 2015 is projected and excludes hospice, direct graduate medical education, and indirect medical education payments. FFS spending and MA plan bids are per month per beneficiary and standardized for a beneficiary of average health status. Market areas consist of core-based statistical areas and health service areas in 50 states and the District of Columbia. Number of Medicare beneficiaries and MA enrollees are as of January 2015.

Source: MedPAC analysis of MA plan bids for 2015 and MA enrollment data for January 2015.



**FIGURE 1-1**

**Example 1: Nationally set base premium pays for FFS in every market**



Note: FFS (fee-for-service), MA (Medicare Advantage). FFS spending for 2015 is projected and excludes hospice, direct graduate medical education, and indirect medical education payments. FFS spending and MA plan bids are per month per beneficiary and standardized for a beneficiary of average health status. Market areas consist of core-based statistical areas and health service areas in 50 states and the District of Columbia. Number of Medicare beneficiaries and MA enrollees are as of January 2015. In our examples, we assume the median MA plan bid as the reference MA plan bid. "Difference" is between the median MA plan bid and average FFS spending. For simplicity, a negative premium can be thought of as a reduction of the entire premium plus a cash payment.

Source: MedPAC analysis of MA plan bids for 2015 and MA enrollment data for January 2015.

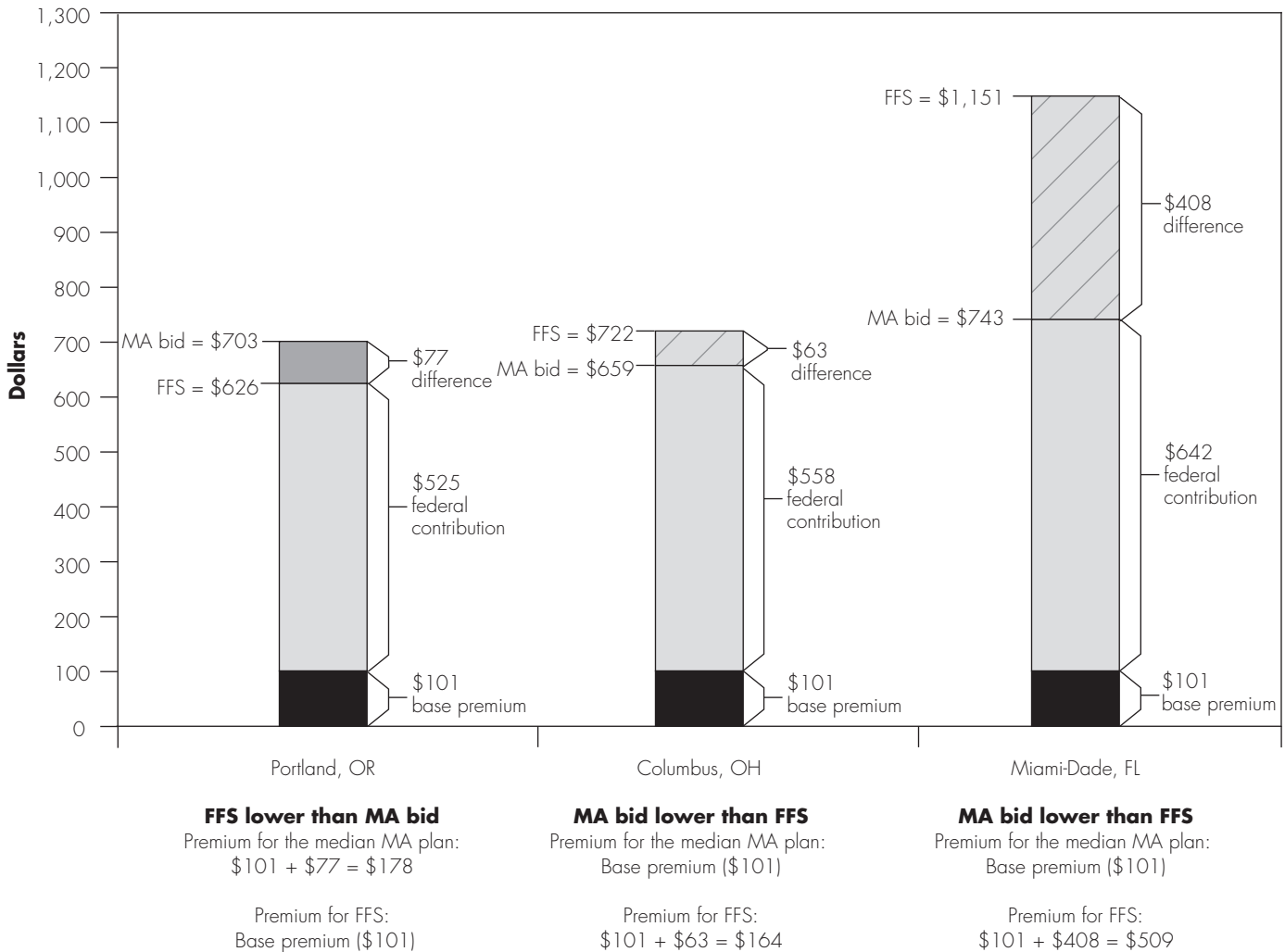
To illustrate what premiums would look like in dollar terms under these examples, we applied them to three market areas—Portland, OR; Columbus, OH; and Miami-Dade, FL. As shown in Table 1-5, the three areas have different levels of per beneficiary FFS spending, ranging from Portland’s \$626 to Miami-Dade’s \$1,151; Columbus’s \$722 is a little below the national average of \$752. They all have many MA plans and high MA penetration (i.e., at least 46 percent of Medicare beneficiaries in each area are in MA plans). In all three examples, we used the median MA plan bid as the

reference MA plan bid. Defining the reference MA plan bid is also a design choice. For example, it could be the lowest bid, the second lowest bid, a weighted average bid, etc. The median plan bid in these three markets varies less than the FFS spending in those markets, in part because the MA benchmarks in 2015 for those markets also vary less than average FFS spending.

Using the data from these three markets, Figure 1-1 illustrates the first example for calculating beneficiary premiums. The base premium is \$101, or 13.4 percent

**FIGURE 1-2**

**Example 2: Nationally set base premium pays for either FFS or MA, whichever costs less, in each market**



Note: FFS (fee-for-service), MA (Medicare Advantage). FFS spending for 2015 is projected and excludes hospice, direct graduate medical education, and indirect medical education payments. FFS spending and MA plan bids are per month per beneficiary and standardized for a beneficiary of average health status. Market areas consist of core-based statistical areas and health service areas in 50 states and the District of Columbia. Number of Medicare beneficiaries and MA enrollees are as of January 2015. In our examples, we assume the median MA plan bid as the reference MA plan bid. "Difference" is between the median MA plan bid and average FFS spending.

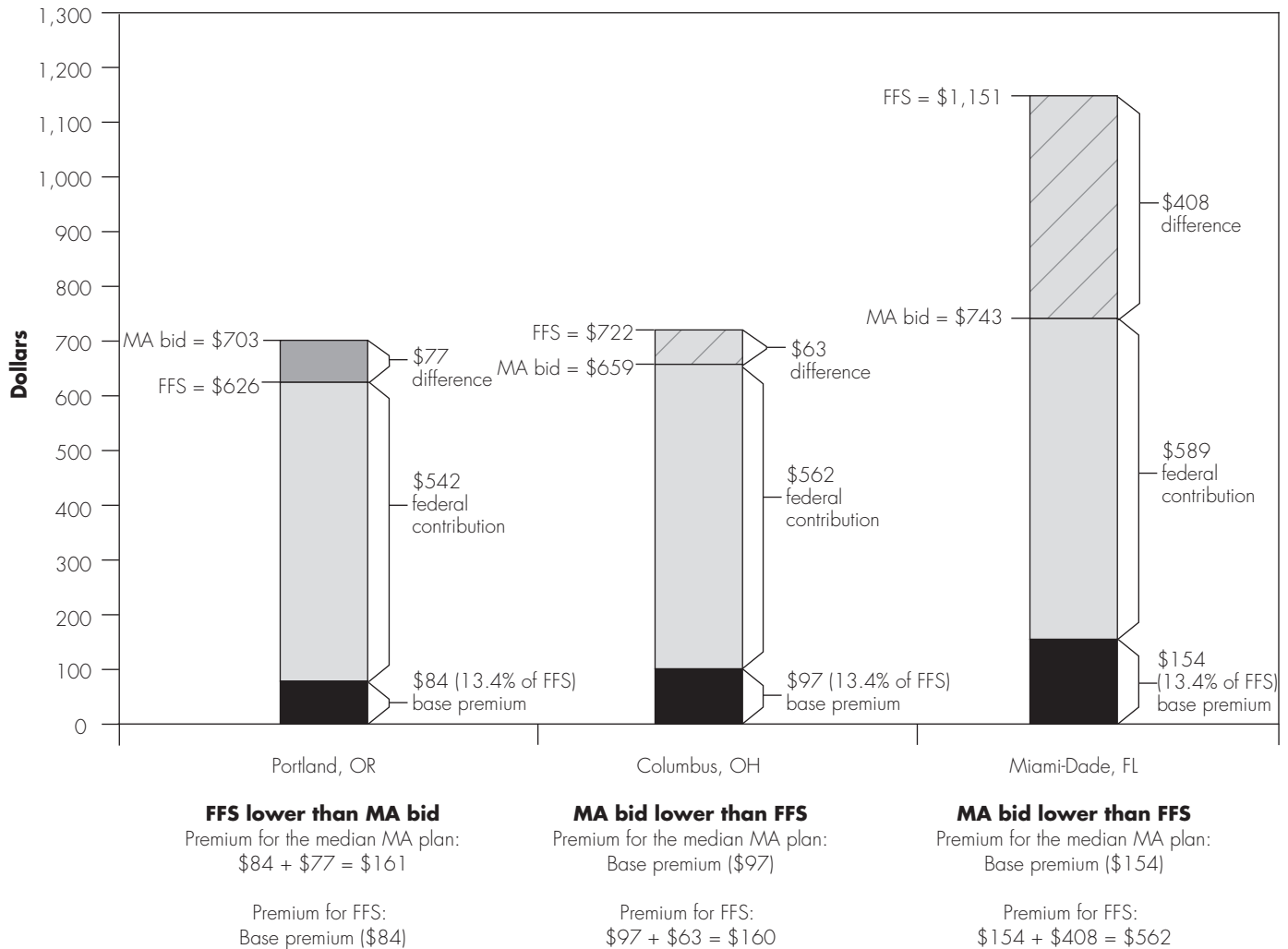
Source: MedPAC analysis of MA plan bids for 2015 and MA enrollment data for January 2015.

of the national average FFS spending (\$752) in all three market areas. In Portland, the reference MA bid is higher than local average FFS, and the difference between MA and FFS equals \$77 (\$703 minus \$626). Therefore, if the beneficiary chooses MA, the premium for the median plan equals the base premium (\$101) plus the difference (\$77), or \$178. (Premiums for MA plans whose bids are lower than \$703 would be less than \$178.) In contrast, in Columbus and Miami-Dade, the median MA plan bid is lower than local average FFS spending—by \$63 and

\$408, respectively. Therefore, the premium in Columbus for the median MA plan, which equals the base premium plus the difference, is \$38 (\$101 minus \$63) and in Miami-Dade is -\$307 (\$101 minus \$408). For simplicity, a negative premium can be thought of as a reduction of the entire premium plus a cash payment. In this example, we assumed that the beneficiary receives the entire difference between FFS and MA. However, how to share this difference between the beneficiary and the program

**FIGURE 1-3**

**Example 3: Locally set base premium pays for either FFS or MA, whichever costs less, in each market**



Note: FFS (fee-for-service), MA (Medicare Advantage). FFS spending for 2015 is projected and excludes hospice, direct graduate medical education, and indirect medical education payments. FFS spending and MA plan bids are per month per beneficiary and standardized for a beneficiary of average health status. Market areas consist of core-based statistical areas and health service areas in 50 states and the District of Columbia. Number of Medicare beneficiaries and MA enrollees are as of January 2015. In our examples, we assume the median MA plan bid as the reference MA plan bid. "Difference" is between the median MA plan bid and average FFS spending.

Source: MedPAC analysis of MA plan bids for 2015 and MA enrollment data for January 2015.

is a policy decision. For instance, under current rules, if MA plans bid below the benchmark, the program retains a share of the difference and the balance is commonly returned to the beneficiary in the form of extra benefits.

In the second example, the base premium of \$101 no longer pays for FFS Medicare in every market (Figure 1-2). Instead, it pays for either FFS or MA—whichever costs less—in each market. Therefore, in Portland, where FFS is lower than MA, the base premium pays for FFS, whereas in Columbus and Miami-Dade, where MA is lower than FFS,

the base premium pays for MA. The difference between FFS and MA is added to the beneficiary premium of the higher cost option in each market. In other words, while the beneficiary pays the base premium of \$101 for FFS in Portland and for MA in Columbus and Miami-Dade, beneficiaries pay a higher premium if they choose MA in Portland and FFS in Columbus and Miami-Dade.

Finally, under the third example, the base premium is set to 13.4 percent of the local FFS spending: \$84 in Portland, \$97 in Columbus, and \$154 in Miami-Dade (Figure 1-3).

**TABLE  
1-6**

**Summary of illustrative examples for calculating beneficiary premiums**

	Market area		
	Portland, OR	Columbus, OH	Miami-Dade, FL
Median MA plan bid	\$703	\$659	\$743
Average monthly FFS spending	626	722	1,151
Difference between MA and FFS	77	-63	-408
<b>Example 1: Nationally set base premium pays for FFS Medicare in every market</b>			
FFS premium	101	101	101
MA premium	178	38	-307
Federal contribution	525	621	1,050
<b>Example 2: Nationally set base premium pays for either FFS Medicare or reference MA plan, whichever costs less, in each market</b>			
FFS premium	101	164	509
MA premium	178	101	101
Federal contribution	525	558	642
<b>Example 3: Locally set base premium pays for either FFS Medicare or reference MA plan, whichever costs less, in each market</b>			
FFS premium	84	160	562
MA premium	161	97	154
Federal contribution	542	562	589

Note: MA (Medicare Advantage), FFS (fee-for-service). FFS spending for 2015 is projected and excludes hospice, direct graduate medical education, and indirect medical education payments. FFS spending and MA plan bids are per month per beneficiary and standardized for a beneficiary of average health status. Market areas consist of core-based statistical areas and health service areas in 50 states and the District of Columbia. Number of Medicare beneficiaries and MA enrollees are as of January 2015. In our examples, we assume the median MA plan bid as the reference MA plan bid. "Difference" is between the median MA plan bid and average FFS spending. For simplicity, a negative premium can be thought of as a reduction of the entire premium plus a cash payment.

Source: MedPAC analysis of MA plan bids for 2015 and MA enrollment data for January 2015.

These changes in the base premium, compared with those under the second example, reflect the beneficiary facing the geographic variation in FFS spending across market areas. As in the second example, the base premium pays for either FFS or MA—whichever costs less—in each area. In other words, while beneficiaries pay the base premium for FFS in Portland and for MA in Columbus and Miami-Dade, they pay a higher premium if they choose MA in Portland or FFS in Columbus and Miami.

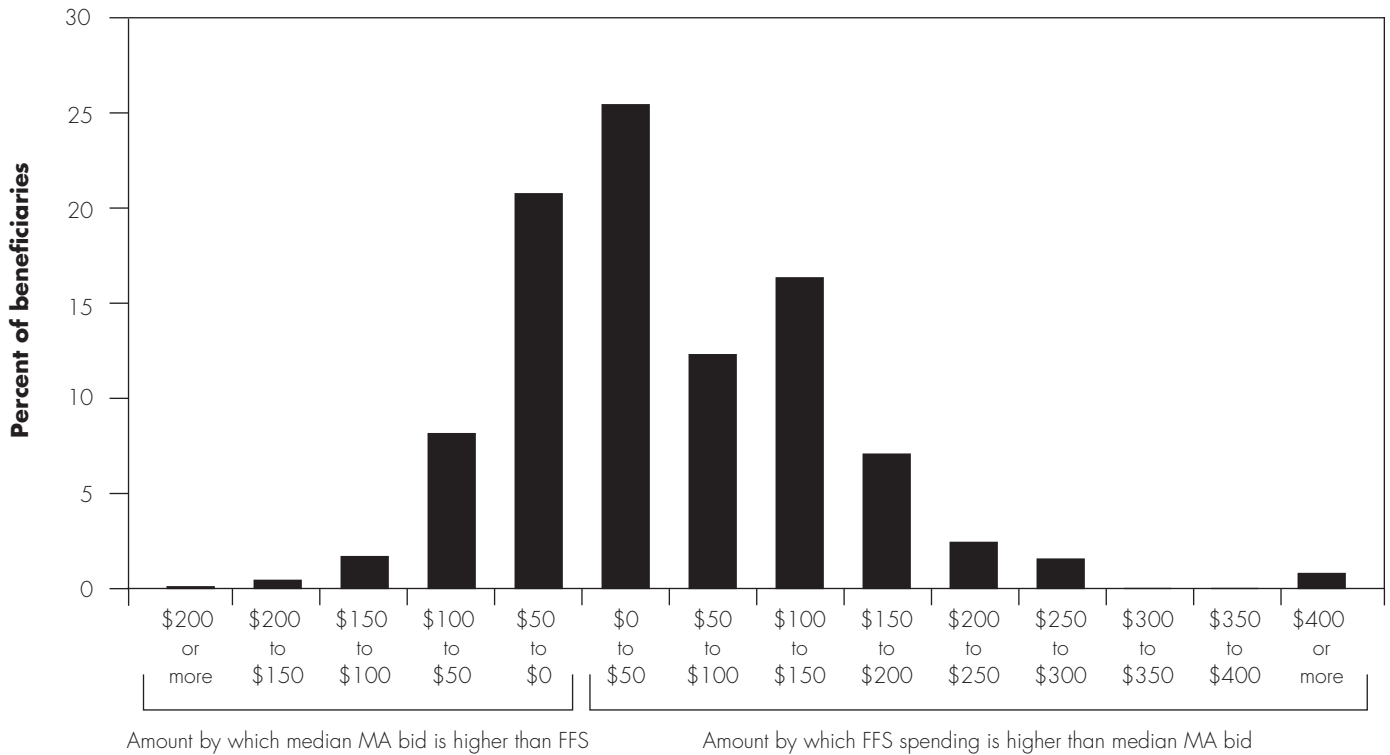
The first and second examples for calculating beneficiary premiums highlight how the difference in the average monthly cost of the Medicare benefit under FFS and MA within each market area can be shared between the

program and the beneficiary. Differences in the reference MA bid relative to FFS in each market are summarized in Table 1-6: \$77 in Portland; -\$63 in Columbus; and -\$408 in Miami-Dade. Under the first example, the beneficiary who chooses MA pays the entire difference only if MA is higher cost than FFS and gets the entire difference if MA is less than FFS. In contrast, in the second example, the beneficiary who chooses the higher cost option pays the entire difference regardless of which option—either FFS or MA—is higher cost, and the federal contribution is less than in Example 1 if FFS is higher cost.

The contrast between the second and third examples for calculating beneficiary premiums raises the question

**FIGURE 1-4**

**Distribution of the difference between average FFS spending and the median MA plan bid, 2015**



Note: FFS (fee-for-service), MA (Medicare Advantage). FFS spending for 2015 is projected and excludes hospice, direct graduate medical education, and indirect medical education payments. FFS spending and MA plan bids are per month per beneficiary and standardized for a beneficiary of average health status. Market areas consist of core-based statistical areas and health service areas in 50 states and the District of Columbia. Number of Medicare beneficiaries and MA enrollees are as of January 2015. Out of 1,231 market areas in our dataset, 231 market areas have no plan bids due to exclusions of certain MA plans.

Source: MedPAC analysis of MA plan bids for 2015 and MA enrollment data for January 2015.

of who should pay for or benefit from the geographic variation in FFS spending. Because these amounts are all risk adjusted, geographic variation arising from differences in health status or dual-eligible status are already accounted for. The remaining differences represent differences in local input prices and service use. In the second example, the base premium does not vary across areas, whereas in the third example, the base premium adjusts proportionately to local FFS spending. Is it fair for beneficiaries in high-spending areas to pay higher premiums for the same basic benefit? Alternatively, is it fair for beneficiaries in low-spending areas to cross-subsidize beneficiaries in high-spending areas? More broadly, how should the program and the beneficiary share the geographic variation in program spending?

There are potential savings in program spending in each of the examples if beneficiaries choose the lower cost

model more often. A key policy question is how those potential savings could be shared between the beneficiary and the program.

In all three illustrative examples, the difference between the average FFS spending and the reference MA bid is a key variable in calculating beneficiary premiums. Especially in the second and third examples, this difference is the additional premium beneficiaries would pay if they chose the higher cost option between FFS and the reference MA plan. Figure 1-4 summarizes the distribution of the differences between FFS and MA for all market areas. Almost half of beneficiaries are in market areas where the difference is less than \$50. About 2 percent of beneficiaries are in market areas where the median MA bid is higher than FFS spending by \$100 or more. In contrast, about 28 percent of beneficiaries are

## How the beneficiary premium is calculated under Part D

Under Part D, stand-alone prescription drug plans and Medicare Advantage (MA) drug plan sponsors bid to provide an outpatient prescription drug benefit to enrollees. Each plan serves enrollees who live within 1 of 34 Part D regions, which are made up of either 1 state or multiple states. The law provides for a defined basic benefit, but, within limits, plan sponsors can offer different benefit designs that have the same actuarial value as the defined benefit. Sponsors can offer enhanced benefits if they also offer a plan with basic benefits in the same region.

For each enrollee, Medicare provides plans with a subsidy that averages 74.5 percent of basic benefits. That subsidy takes two forms: a direct subsidy (monthly capitated payment) that lowers premiums for all enrollees and individual reinsurance that pays for 80 percent of enrollee spending above Part D's catastrophic threshold.

Enrollee premiums are the direct result of Part D's bidding process. Plans submit bids that reflect their expected benefit payments plus administrative expenses after deducting expected reinsurance subsidies. CMS takes standardized bid amounts for basic benefits and calculates an average, weighted by each plan's enrollment in the previous year. The base beneficiary premium equals 25.5 percent of the national average benefit costs. Because the base premium and direct

subsidy are set nationally, those amounts do not vary across plans or by geographic region.

However, enrollees pay different premium amounts depending on the plan they select. Each plan's premium is set as the base premium plus any difference between the plan's bid and the national average bid. Enrollees choosing a plan that is costlier than the average pay a higher premium—the full difference between the plan's bid and the nationwide average. If they select a plan that has a lower than average bid, their premium is lower by that difference. If enrollees pick a plan that includes supplemental coverage, they must pay the full price for the additional benefits.

Part D ensures that beneficiaries eligible for the low-income [drug] subsidy (LIS) have premium-free plans available to them. Part D's bidding process determines a maximum amount that Medicare will pay for premiums on behalf of LIS enrollees in each of the country's 34 Part D regions. It is based on an average of premiums for plans with basic benefits, weighted by each plan's LIS enrollment in the previous year, and it ensures that at least one stand-alone prescription drug plan is available at no premium. Plans with premiums up to this regional threshold are premium free for LIS beneficiaries. As a result, LIS beneficiaries have access to at least one premium-free stand-alone drug plan, even in regions where the average bid is higher than the national average. ■

in market areas where FFS spending is higher than the median MA bid by \$100 or more. Figure 1-4 (p. 21) also shows that even among market areas where FFS is higher by a large difference, Miami-Dade remains an outlier, with a difference of \$408. In all other markets, the difference between FFS and MA is less than \$300.

### Limitations of our analysis

Our analysis has important limitations. First, in illustrating only three premium designs, our analysis does not represent a definitive or comprehensive set of design choices. For example, Part D takes a different approach to calculating beneficiary premiums (see text box). Differences in design choices can have a major impact on beneficiaries and on an area's health care marketplace.

Our June 2013 chapter on competitively determined plan contributions provides a broader discussion of key design elements (Medicare Payment Advisory Commission 2013). Furthermore, the examples used in this chapter to illustrate the relative effects of a particular design may not be realistic as actual policy choices.

Second, our analysis uses plan bids under the current MA program as a proxy for the total cost of providing the Medicare benefits through private plans because they are the best measure we have. However, these bids are the plans' responses to current rules, which are different from all three illustrative examples. Under different rules, MA plans are likely to bid differently. For example, current MA bids are highly correlated with

current MA benchmarks, which range from 95 percent to over 125 percent of FFS spending in 2015. Without those administratively set benchmarks, as in our analysis of Example 2 and Example 3, plans would likely change their bids. Additionally, plan bids would be different if the program defined a market area, as under our illustrative examples, compared with if MA plans defined their own service area, as under current law. Moreover, under different rules for calculating beneficiary premiums and the federal contribution, MA plans would likely make different decisions regarding whether to enter or exit a particular market area and how much to bid.

Finally, our analysis does not discuss how beneficiaries would respond to changes in their premiums. Our examples show that methods for calculating beneficiary premiums could have a major effect on beneficiaries' costs. But a premium is only one of many factors beneficiaries might care about. In making a choice with the highest value to them, some beneficiaries would need to trade off premiums and other aspects of the benefit package, as well as their perception of the quality of different choices.

This process can be difficult and complex. For example, under current law, choosing traditional Medicare offers no restrictions on providers but may require additional choices among Medicare supplemental plans and among Part D plans. Choosing an MA plan may simplify the process by offering all Medicare benefits—Part A, Part B, Part D, and supplemental coverage—in a single plan, but would necessitate receiving care from a limited network of providers. When choices require considering multiple dimensions simultaneously, beneficiaries' ability to compare and make trade-offs among a large set of options would likely be limited (see text box on factors affecting beneficiaries' decision making, p. 24). Moreover, if the difference in premiums among choices is too high, the choice that the beneficiary would otherwise consider most attractive might be prohibitively expensive and therefore not a realistically viable choice. These issues are additional policy considerations that must be factored into designing beneficiaries' financial incentives.

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## **The effect of coding on payments, bids, and quality**

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Coding (i.e., the reporting of a beneficiary's diagnoses at each encounter) affects payment, bids, and quality

measurement. Coding can directly influence payment. In MA, for example, a beneficiary's risk score (which incorporates selected diagnoses as well as some additional factors) is multiplied by a base payment rate to determine a plan's payment. When an MA plan bids to provide the Medicare benefit in a market, that bid is for a person of average risk, which is defined as a person having a risk score of 1.0 using CMS's hierarchical condition categories (CMS-HCC) risk model. Because a beneficiary's health status, based on diagnosis codes, determines the beneficiary's risk score, coding is also crucial to bidding. Finally, for risk-adjusted quality outcomes such as readmissions, coding is important because it can affect the risk adjustment for a beneficiary and the resulting quality score. Thus, uniformity in coding is a crucial consideration when attempting to synchronize policy across the three payment models.

### **Coding practices and the determination of bids and payments**

A key feature of MA's bidding system is that a bid is for a person of average risk (or a 1.0 risk score). Risk adjustment is designed to neutralize cost differences that are due solely to the health status of beneficiaries within each plan. Without adequate risk adjustment, a plan that had sicker enrollees would be more costly than other plans (all else being equal) and its bid would be higher. We do not want to penalize such plans, and we do not want incentives for plans or ACOs to avoid sicker beneficiaries. With adequate risk adjustment, differences in bids would reflect varying levels of resource use driven by a plan's utilization management practices, providers' practice styles, beneficiary preferences for care, and the mix of services used. Differences in cost based on such factors are the cost differences that should be reflected in plan bids.

MA plans encourage more intensive coding than is the practice among FFS providers because it increases their payments from Medicare. For example, a plan may ensure that the physician includes a diagnosis for diabetes each time a diabetic patient has an office visit to make sure that diagnosis is included in the risk-adjustment model. While the diagnosis is appropriate, a physician in FFS may not include that diagnosis if the patient is visiting for some other reason—resulting in inconsistency between the coding practices of each sector. Another source of more-intensive coding in MA plans is the inclusion of diagnoses from home assessment visits, which are initiated by MA plans but may not involve interaction with a beneficiary's primary care provider. Such visits are not a common

## Factors affecting beneficiaries' decision making

A policy designed to create financial incentives for beneficiaries anticipates certain behavioral responses from them (for example, reducing their use of services in response to higher cost sharing or changing their Medicare coverage in response to changes in premiums). To meet the intended goals, designing such a policy would need to take into consideration how beneficiaries make decisions and respond to incentives. In particular, it would need to take into account that beneficiaries' ability to compare and make trade-offs among a large set of options may be limited.

People's ability to understand and use health insurance—Medicare included—may be limited simply because health insurance is inherently complex. It requires the consideration of multiple dimensions simultaneously, is filled with unfamiliar terminology, and requires a high level of numeracy to make informed judgments. Moreover, people have different preferences and needs for health care, which can be uncertain and unpredictable. As a result, people often stick with the same insurance coverage year after year even when better options are available, seek advice from family or friends, and choose highly advertised plans or those from a well-known brand. (Health insurance is not unique in this way. People show similar shopping behavior in other complex financial decisions, such as mortgage shopping.)

The psychology literature suggests that the number of options people face may affect their choice (Iyengar and Kamenica 2010, Schwartz 2004). The choice overload hypothesis states that an increase in the number of options to choose from may lead to adverse consequences, such as decreased motivation to choose or less satisfaction with the option chosen. A meta-analysis of choice overload studies shows differences in the study results (Scheibehenne et al. 2010). Although

the literature does not have clear answers on when and why choice overload may occur, it suggests that choice overload is more likely under certain circumstances. Choosing is more difficult when available options are similar, no clearly superior option exists among several attractive options, or decision makers have no well-defined preferences before choosing. In these situations, individuals typically use decision heuristics to simplify or limit the amount of information that must be processed to make the decision. These short cuts are not always benign. For instance, variables that are easily measured, like cost, are often subconsciously given more weight than variables that are more subjective, like quality. Ultimately, the process may arbitrarily eliminate potentially relevant details from consideration and overstate the importance of other information. Beyond the number of options available, therefore, making it easier for beneficiaries to navigate the set of available options and reducing the time and cognitive burden required to make a choice would improve the decision-making process.

Moreover, the nature of how choices are presented, described, and framed can affect people's decision making. Because people are prone to systematic biases, their decisions are sensitive to the context in which they make them (Kahneman 2011). For example, people's decisions can change depending on the order in which choices are arrayed and the words used to describe and frame them. But because these biases are predictable, they also present an opportunity to influence people's decisions in the direction policymakers desire. For example, the initial set of options influences how consumers view and interpret subsequent information and the decisions they ultimately make. Therefore, determining the default setting for sorting and displaying options has a big effect on what consumers see as their choices. ■

occurrence in FFS Medicare. Because the CMS–HCC model is calibrated using only FFS data, the inclusion of diagnoses from health assessments done in the home is problematic.

Recognizing the issue of more-intensive coding in MA plans, the Medicare statute currently requires a coding

adjustment to address differences in coding practices between MA plans and FFS providers so that MA payments are accurately risk adjusted. For 2015, that adjustment was a risk score reduction of 5.16 percent. However, the Commission has found that the statutory coding adjustment does not fully adjust for the differences



**TABLE  
1-7**

**Effect on MA plan bids from a 3 percent reduction in plans' risk scores**

	Market area	
	Portland, OR	Miami-Dade, FL
<b>Median bid (risk score not reduced)</b>		
Median bid before risk adjustment to 1.0	\$668	\$1,025
Weighted average risk score from 2015 bids	0.95	1.38
Median bid after risk adjustment	\$703	\$743
<b>Median bid (risk score reduced by 3%)</b>		
Median bid before risk adjustment to 1.0	\$668	\$1,025
Weighted average risk score from 2015 bids, reduced by 3%	0.92	1.34
Median bid after risk adjustment	\$725	\$766
Difference in median bids after risk adjustment	\$22	\$23

Note: MA (Medicare Advantage). The risk scores are determined for plans other than employer group plans and special needs plans.

Source: MedPAC analysis of Medicare Advantage plan bids for 2015.

between MA and FFS and that MA risk scores should be further reduced by about 3 percent (Medicare Payment Advisory Commission 2015).

For purposes of synchronizing policies, one approach to addressing the observed coding differences is to use the current approach of an across-the-board reduction in the risk scores that MA plans report. (A similar approach could be applied to ACOs to the extent that more-intensive coding occurs among ACO providers and it has an effect on the computation of costs and savings.) The example described earlier of how to determine MA premiums and the cost to beneficiaries of FFS in the different markets already reflects the current statutory adjustment. Table 1-7 illustrates how a further adjustment of 3 percent would affect that analysis. A reduction in plan risk scores of 3 percent to adjust for more-intensive coding would raise plan bids because they would be divided by the new, lower risk score to compute a 1.0 bid. That would narrow the difference between FFS and MA in Miami-Dade, where FFS is the more costly option, and widen the difference in Portland, where MA is the more costly option.

For example, the median bid before risk adjustment in Miami-Dade was \$1,025. This amount, divided by the risk score from the 2015 bids (1.38) yields a 1.0 bid of \$743, which is what we used in our analysis (e.g., see Table 1-6 (p. 20) and Figure 1-1 (p. 17)). If the risk

score were reduced by 3 percent, the risk score becomes 1.34. Dividing \$1,025 by that risk score yields \$766 as the new 1.0 bid. As shown in Table 1-7, the median bid increases from \$743 to \$766 in Miami-Dade, and from \$703 to \$725 in the Portland, OR, metropolitan statistical area (MSA). If in Miami-Dade, beneficiaries choosing the FFS option are expected to pay the full difference between the average FFS cost and the median MA bid (as would be the case in the second and third premium design examples), the beneficiary's financial obligation is reduced by \$23 per month with the coding adjustment. Table 1-7 also demonstrates that, although median MA bids in Miami-Dade and Portland are close to each other after risk adjustment (\$766 and \$725, respectively), there would continue to be large geographic variation in actual payments to MA plans. The MA payment rate is over 50 percent higher in Miami-Dade for the median bid (\$1,025 versus \$668 in Portland) because of the difference in risk scores of the beneficiaries enrolling in MA. The difference in risk scores between the two areas is also apparent in the FFS population of Miami-Dade and Portland. CMS data show that in 2012 the Miami-Dade risk score was 1.31, while in the Portland MSA it was 0.92 (Centers for Medicare & Medicaid Services 2015b).

There may be reasons to use a coding adjustment that is not an across-the-board adjustment. Currently, plans are, in effect, disadvantaged if they code less intensively

than other MA plans because the adjustment is the same for all plans. Kronick and Welch (2014) have shown that coding practices are not uniform across MA plans. An alternative to an across-the-board coding adjustment—particularly if premiums are determined at the local market level—is to have plan-specific coding adjustments (which could also apply to ACOs with more-intensive coding). This adjustment would be more difficult to determine, but it would remove some of the incentive for plans to increase coding intensity. Another approach might be to tighten the rules for acceptable coding so that MA coding more closely mirrors the coding in FFS. For example, CMS could use MA encounter data for risk-adjustment purposes, but accept only those encounters that have an analogue in FFS Medicare.<sup>17</sup>

A further complication is that coding also varies by geographic area in the FFS sector beyond what would be expected based solely on health status. Song and colleagues (2010) found that areas of higher utilization have more-intensive coding with “substantial differences in diagnostic practices that are unlikely to be related to patient characteristics.” This finding raises questions such as whether the FFS risk scores should be reduced with a geographic-area specific coding adjustment. Should the coding adjustment for MA plans in a high-service-use area like Miami-Dade be in relation to the Miami “community standard” of coding in FFS rather than a national average? If the premiums for FFS will vary by market area in a synchronization model, should Miami-Dade FFS costs have a coding adjustment different from a low-service-use area like Portland?

### **Coding practices and other issues in the assessment of quality**

Another aspect of synchronization across payment systems is the concept of having payment differentials based on the quality of care. The Commission has considered an approach that would give additional quality-based payments to MA plans and ACOs if their quality is better than that of FFS in their market (and lower payments if their quality is worse). This approach is predicated on the fact that MA plans and ACOs have agreed to be accountable for a population of beneficiaries and on the availability of population-based outcome measures. (See Chapter 3 of the Commission’s June 2014 report for a full discussion of this approach (Medicare Payment Advisory Commission 2014b).) Currently, our ability to measure such outcomes is limited, and some of the limitations arise from differences in coding practices.

### **The effect of coding on quality measurement**

Coding can play a part in determining a plan’s performance on quality measures. A case in point is hospital inpatient readmission measures, one of which is a Healthcare Effectiveness Data and Information Set<sup>®</sup> (HEDIS<sup>®</sup>) measure used in the MA star system of quality measurement. A readmission measure also is one of the outcome measures that the Commission has suggested for population-based quality measurement.

The HEDIS readmission measure compares a plan’s actual readmission rate with an expected readmission rate based on patients’ demographics and diagnoses. All other things being equal, if more intensive coding results in a greater number of diagnoses in one plan compared with another, the plan with more intensive coding will show better performance on the readmission measure because its expected readmission rate will be higher.

Measures that are not risk adjusted can also be affected by coding practices. For example, many of the current HEDIS measures are for the treatment of diabetics. If MA plans are able to identify all their enrollees who have diabetes, including those in the early stages of the disease, while in FFS the diagnosis is more likely to appear in later stages (when comorbidities are more likely to be present), the MA plan’s share of diabetics who control their blood sugar, cholesterol, and blood pressure may be higher than in FFS because the FFS beneficiaries diagnosed with later-stage diabetes are a more complicated set of patients.

### **Other issues in synchronizing quality measurement**

There are many other issues in synchronizing quality measurement and assessment across the three payment models. One notable difference is that higher quality is rewarded with extra payment in the MA model, whereas in the ACO model, unless quality meets a specified threshold, shared savings payments are reduced. This difference would be resolved under our approach—rewards for both ACOs and MA plans with better quality than FFS and penalties if lower. In addition to this issue, other, more technical issues would need to be resolved. Some examples are discussed below.

The Commission’s March 2010 report included a congressionally mandated study of methods to compare quality in FFS Medicare with the quality of care rendered by MA plans. The observations made in that report and its recommendations are applicable in our discussion of ensuring a level playing field in measuring quality

across the three payment models. Some of the report’s recommendations have been implemented, but others have not. For example, performance of MA plans in the star rating system continues to be measured at the contract level, even though a single contract can stretch across a wide geographic area—as in the case of the first health plan listed in public use files of HEDIS data, which is “CHA HMO (Hawaii/Iowa),” with about half of the plan’s enrollment in Hawaii and half in Iowa. The Commission recommended that quality reporting should be done at a smaller geographic level, using areas that correspond more closely with health care markets.

With regard to the patient experience measures collected through the Consumer Assessment of Healthcare Providers and Systems® (CAHPS®) survey, the phrasing of the questions differs between, for example, the ACO CAHPS survey and the MA CAHPS survey. In addition, the case-mix adjustment for response bias differs. In MA, Medicare–Medicaid dual-eligibility status is a factor in assessing case mix, while in the CAHPS Clinician & Group Surveys (used for ACOs), it is not. These differences in the mechanics of quality measurement need to be addressed before we can be confident that we can judge and compare quality in the different payment models.

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## Conclusion

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We have reviewed three aspects of synchronizing Medicare payment models in this chapter: which model has the lowest program spending in select markets, ways of designing the beneficiary premium to encourage beneficiaries to choose the lower cost model, and how coding needs to be accounted for to assure fair comparisons across models. Each of these issues can be quite complex, but there are some unifying principles for evaluating them that stem from considering the goal of synchronizing Medicare payment policy: maximizing the value of the Medicare program to beneficiaries and taxpayers. We need to determine how to set payment rules that reward the most efficient model of care in a market, how to encourage beneficiaries to be in that model, and how to provide the information they need to make informed decisions. If more beneficiaries were in the most efficient model, savings could be generated that could then be shared between the program and beneficiaries.

By the most efficient payment model in each market, we mean the model that has the lowest program spending

and provides high-quality care. In this chapter, we have focused on lower program spending and found that each of the three models has the lowest program spending in some markets and all serve a function in the current system. In our June 2014 report, we focused on quality and described a system in which MA plans and ACOs would be judged relative to the ambient level of FFS quality in each market and be rewarded (or penalized) if their quality was above (or below) that of FFS (Medicare Payment Advisory Commission 2014b). Spending and quality considerations would need to be combined to encourage providers in all markets to improve quality, control program spending, and be part of the most efficient model of care in their market.

Encouraging beneficiaries to be in the most efficient model is the next step. In this chapter, we have looked at three ways of setting beneficiaries’ premiums.<sup>18</sup> In each illustrative example, the federal contribution is equal for FFS and MA in each market, no matter which option the beneficiary chooses. That is, in all three examples the federal contribution in a market is financially neutral between models. The examples assumed that quality was equal across models, which would be unlikely, and as discussed above, payments to each MA plan and ACO should be modified to account for quality. If MA were the lower cost model and the beneficiary premium was set to cover the cost of being in MA, the beneficiary would have to be guaranteed access to an MA plan with quality at least equal to the ambient level of FFS quality in the market. For example, only bids from plans with quality equal to or above FFS could be counted when establishing the reference bid.

Putting synchronization into practice—redesigning payments, beneficiary premiums, and benefit design—will be a complex task and will require balancing the interests of beneficiaries, taxpayers, and providers. One crucial part of the task will be defining what is equitable. There are three aspects of this definition that are of particular importance:

- ***Equity for beneficiaries across the country.*** As we have shown in previous work, the cost of Medicare varies widely across the country because of differences in input prices, health status, and use of Medicare services. Currently, beneficiaries’ premiums for FFS reflect none of these factors, and one could argue that beneficiaries in low-cost markets are subsidizing beneficiaries in high-cost markets. Should beneficiary premiums reflect the difference between prices and service use in the local market and the

national average, or should beneficiaries be insulated from some or all of these differences? Should beneficiaries pay more or less depending on regional spending over which they have little influence?

- ***Equity for beneficiaries within a market.*** Beneficiaries within a market may now have the choice of many MA plans or staying in FFS Medicare. Should the government make equal contributions for all plans in a market—as we have illustrated in our examples—even if that means a beneficiary may have to pay more to remain in FFS in some markets? If there are savings, should they accrue entirely to the beneficiary, to the Medicare program, or a combination?
- ***Equity across generations.*** One aspect of equity we have not investigated is that of equity across generations. Under current law, taxpayers—who are increasingly in limited-network plans with high premiums, deductibles, and cost sharing—essentially guarantee Medicare beneficiaries access to any Medicare provider of their choice for a set premium across the country. At its inception in 1965, Medicare was modeled on the insurance design then prevalent in the market for those under age 65, premised on the idea that those over age 65 should have access to health insurance on similar terms. As insurance design changes, should Medicare return to that principle and

reflect current insurance design, which often does not guarantee access to all providers but only those in a defined network? If Medicare is not redesigned, should other taxpayers be asked to subsidize a benefit design that is more generous than what is becoming standard in the industry? Or should the government contribution be set to give Medicare beneficiaries an incentive similar to those with commercial insurance to pick the lower cost option?

No matter how policymakers resolve these issues of equity, other issues will need to be addressed. We have mentioned quality and risk adjustment. In addition, there will be complications in regard to how to design a synchronization policy for low-income beneficiaries, how to ensure capacity in the efficient model (that is, how would Medicare ensure that MA plans had the capacity to handle all comers if MA were the low-cost model in a market), and whether Medicare would have to change from an opt-out of FFS design to an opt-out of the more efficient model design if premiums were based on the low-cost alternative. It will be difficult to achieve consensus on these issues and others that will arise. However, the goal is one that is essential to achieve if we want the Medicare program to be affordable and maintain sufficient support from both its beneficiaries and the taxpayers who fund a large share of the program's cost. ■

## Endnotes

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- 1 The Part A and Part B benefit package in MA excludes hospice. In our March 2014 report, the Commission recommended including the Medicare hospice benefit in the MA benefit package beginning in 2016 (Medicare Payment Advisory Commission 2014c).
- 2 Our set of ACOs includes Pioneer ACOs with a fiscal year that started in January 2013, MSSP ACOs with a fiscal year that started in April 2012, and MSSP ACOs with a fiscal year that started in July 2012. For simplicity, we use “2013 ACO performance” for all ACOs.
- 3 By comparing the savings relative to a market’s FFS spending, we could use data from different years without having to account for price changes over time, which allowed us to use the most recent data available for the ACO comparisons with FFS and the MA comparisons with FFS.
- 4 We measured service use from 2006 to 2008 based on the data from our earlier work (Medicare Payment Advisory Commission 2011). Because the ACO benchmarks were computed using data from 2009 onward, it is advantageous to measure service use with data before 2009 to avoid random variation affecting both the ACO benchmarks and the relative service-use computations.
- 5 The dependent variable in the regression was ACO savings in the ACO’s fiscal year (2012/2013). The independent variables were the historical service use in that CBSA (2006 to 2008), the share of ACO beneficiaries who were dual eligible and over 65, the share who were disabled, and the share who had end-stage renal disease. The objective was to see whether it was more or less difficult to generate savings when serving dual-eligible beneficiaries. The coefficient on dual-eligible status was significant ( $p < 0.01$ ) and negative, which suggests that the ACOs have been more successful bringing dual-eligible beneficiaries’ spending down than the spending on other beneficiaries. The coefficient on service use was also significant ( $p < 0.001$ ), but the share who were disabled and the share who had end-stage renal disease did not significantly affect shared shavings. The dual-eligible finding needs to be examined further. In past research, we have found that there may be a need for separate risk adjusters for fully dual-eligible beneficiaries and partial dual-eligible beneficiaries who have slightly higher incomes. We will be testing the data in the future to see whether these findings hold true for both partial and fully dual-eligible beneficiaries.
- 6 ACOs have an incentive to keep patients satisfied so they do not seek care outside of the ACO. When we talked to ACO physicians, they have said that they have taken measures such as setting up new agreements with specialists to allow for more-timely appointments to improve patient satisfaction.
- 7 Under current law, beneficiary premiums for Medicare Part A and Part B are separate. Most beneficiaries pay no premium for Part A based on their employment history, whereas all beneficiaries who elect Part B pay a premium set at about 25 percent of Part B benefit costs per beneficiary. In this chapter, we define beneficiary premiums as a set percentage of Part A and Part B benefit costs, but we do not specify the mechanism through which it would be collected.
- 8 Quality is an important aspect of synchronization. However, we could consider using quality as a payment adjustment that would take place outside of the determination of benchmarks or premiums. This approach is consistent with the Commission’s approach to quality discussed in our June 2014 report (Medicare Payment Advisory Commission 2014b).
- 9 To mitigate these problems, the Commission recommended in 2005 combining counties into larger payment areas for MA, consisting of metropolitan statistical areas (MSAs) and health service areas outside MSAs (Medicare Payment Advisory Commission 2005).
- 10 FFS spending data are from the MA rate calculation data for 2015 (Centers for Medicare & Medicaid Services 2015b).
- 11 With some exceptions, all MA plans must also offer an option that includes the Part D drug benefit, although payments for the Part D benefit are handled separately. For the purposes of this analysis, we used only the Part A and Part B component of the bid.
- 12 The local MA benchmark for a plan serving only one county is the county benchmark rate. Plans serving multiple counties would have a weighted benchmark based on the expected enrollment coming from each county. Regional PPO plans, another option within MA, bid in relation to regional benchmarks, which are set under a different methodology.
- 13 We use current MA plan bids for 2015 because they represent the latest data available. As discussed, county benchmarks under the current MA program can differ significantly from county FFS spending, and plan bids tend to be correlated with benchmarks, not FFS spending. Therefore, MA plan bids would likely change if benchmarks and rules changed.
- 14 For individuals who are not eligible for premium-free Part A and have 30 to 39 quarters of Medicare-covered employment, the premium is \$224 per month in 2015. For individuals who are not eligible for premium-free Part A and have fewer than

- 30 quarters of Medicare-covered employment, the premium is \$407 per month. There are very few individuals in these two categories.
- 15 Higher income beneficiaries pay higher monthly premiums (as high as \$336 a month in 2015) based on their modified adjusted gross income.
  - 16 Part A is primarily financed through dedicated payroll taxes paid by current employers and employees. If we take these payments into account, the ultimate government subsidy would be lower.
  - 17 In determining FFS and MA risk scores, the current risk-adjustment system uses diagnoses from only certain sites of service and from certain providers. For example, diagnoses from skilled nursing facility or durable medical equipment claims are not used. Diagnoses arising from a home assessment are included for risk adjustment if a health professional is billing for a Medicare-covered service. However, the claims arising from a home assessment in MA (usually billed by nurse practitioners) are very infrequent in FFS and can be thought of as not truly having an analogue in FFS. In the Final Notice of MA rates for 2016, CMS noted that “the encounter data system accepts diagnoses obtained through chart review,” which also represents a difference between the diagnoses that would be present in FFS claims and diagnoses in plans’ encounter data (Centers for Medicare & Medicaid Services 2015a).
  - 18 In the chapter, we have not specified how the beneficiary premium would be collected. Currently the only mechanism is the Part B premium, which is now used to collect additional amounts for income-related premiums.

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