



#### Session 38, Actuarial Implications of a Medicare Buy-in Option

SOA Antitrust Disclaimer
SOA Presentation Disclaimer

# Actuarial implications of a Medicare buy-in option

Lindsy Kotecki, FSA, MAAA Consulting Actuary Milliman

Stan Westrom, ASA, MAAA Associate Actuary Milliman

June 24, 2019



#### **Limitations**

- This presentation is intended for informational purposes only. It reflects the opinions of the presenters, and does
  not represent any formal views held by Milliman, Inc. Milliman makes no representations or warranties regarding
  the contents of this presentation. Milliman does not intend to benefit or create a legal duty to any recipient of this
  presentation.
- We relied on the data and other information from public and proprietary data sources for this analysis. We have performed a limited review of the data and other information and checked for reasonableness and consistency, and have not found material defects in the data or information used. If there are material defects in the data or other information, it is possible that they would be uncovered by a detailed, systematic review and comparison of the data to search for data values that are questionable or for relationships that are materially inconsistent.
- Differences between projections in this analysis and actual amounts depend on the extent to which future
  experience conforms to the assumptions made for this analysis. It is certain that actual experience will not
  conform exactly to the assumptions used in this analysis. Actual amounts will differ from projected amounts to the
  extent the assumptions in this analysis are not realized.



#### **Agenda**

Overview of current healthcare system

Landscape of reform proposals

Case study: Medicare Advantage buy-in option

Key takeaways

Questions



# United States healthcare system overview

#### **Overview of United States healthcare programs**

Public (government)	<ul> <li>Medicare</li> <li>Medicaid</li> <li>Indian health service (IHS)</li> <li>Military</li> </ul>
Private (commercial)	<ul> <li>Employer group</li> <li>Individual</li> <li>Association health plans</li> </ul>
Public and private	<ul> <li>Medicare Advantage and Part D</li> <li>Managed Medicaid Individual market ACA subsidies</li> <li>Private correctional Employer group health premiums exempt from taxation</li> </ul>
Uninsureds	<ul> <li>Insurance is unaffordable</li> <li>Insurance is not accessible</li> <li>Insurance is not perceived to be needed</li> </ul>



#### **Healthcare system features**

#### Universal coverage

A system of allocating health care resources in a way that ensures everyone is covered for basic health care services and no one is denied care as long as he or she remains a legal resident in the territory covered.

#### Single payer

Healthcare system in which the government pays private physicians and hospitals directly.

#### Socialized medicine

Healthcare system where the government pays and manages physicians and hospitals directly, as employees of the government.



#### **Healthcare system features**

#### **Public subsidization**

Healthcare program that includes some funding from the government (e.g., through private insurance or direct to consumer).

#### **Comprehensive coverage**

Healthcare that covers all medically necessary services.

#### **Uniform pricing**

The price paid to physicians and hospitals for a service does not vary by healthcare payer or members within a program



#### **Features of US healthcare programs**

Program	Universal coverage	Single payer	Socialized medicine	Public subsidization	Comprehensive coverage	Uniform pricing
Traditional Medicare		X			X	X
Medicare Advantage and Part D				X	X	
Medicaid Fee-for-Service		X <sup>1</sup>			X	X
Managed Medicaid				X	X	
Military <sup>2</sup> / IHS			X		X	X
Employer group				X3	X	
Individual				X	X	
Short term limited duration						
Association Health Plans						

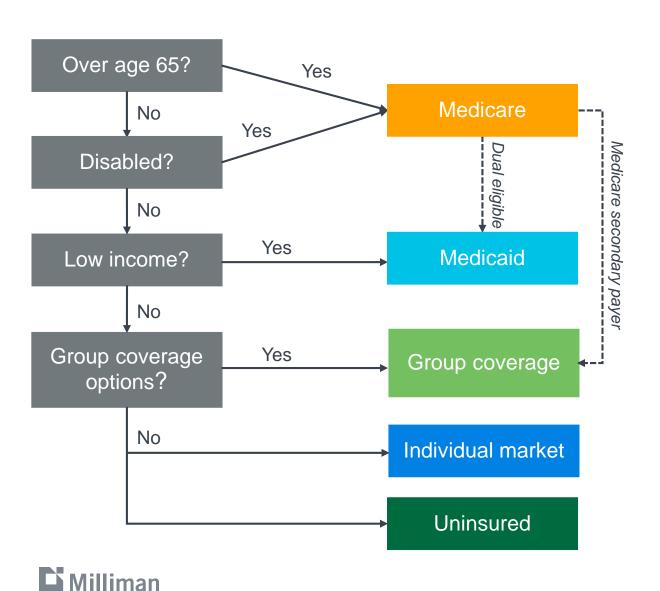
<sup>1.</sup> Funded jointly by the federal and state governments, so not strictly single payer.

<sup>3.</sup> Employers' spending on health insurance premiums is exempt from taxation for both employers and employees.

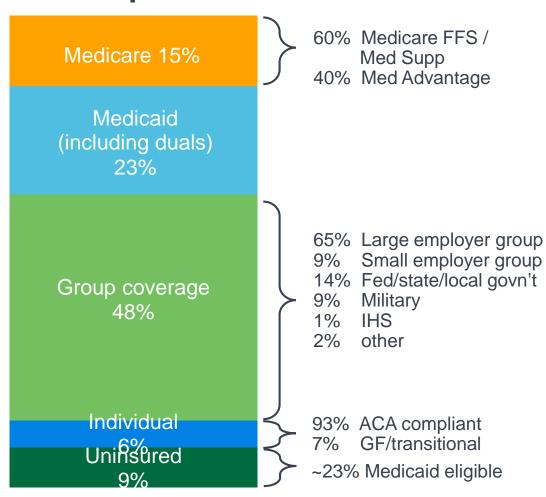


<sup>2.</sup> The VA and Military Health System (MHS) are government run healthcare systems for retired and active duty military personnel and their dependents. TRICARE (under the Defense Health Agency) combines resources of military hospitals and clinics with civilian health care networks. The Patient-Centered Community Care (PC3) contract allows VA beneficiaries to access and receive payment for care outside of the VA system.

#### **Overview of United States healthcare system**



#### 2017 Population<sup>1</sup>



1. Estimates by Charles Gaba | ACASignups.net

# Landscape of healthcare reform proposals

#### **US** healthcare reform proposals

Public plan option	Public healthcare plan to compete with private healthcare plans
Medicare buy-in for older adults	<ul> <li>Option for individuals over age 50 to buy-in to the Medicare program</li> </ul>
Medicaid buy-in	<ul> <li>Option for individuals to buy-in to state Medicaid programs</li> </ul>
Public program with opt out	<ul> <li>Federal healthcare program for all US residents, maintaining employer-sponsored coverage as an option</li> </ul>
Single payer "Medicare-for-all"	Single federal program covering all US residents



#### Features of US healthcare reform proposals

Program	Universal coverage	Single payer	Comprehensive coverage	Socialized medicine	Public subsidies	Uniform pricing
Public option			X		X	X
Medicare buy-in		X*	X		X	X
Medicare Advantage buy-in			X		X	
Medicaid buy-in		X*	X		X	Х
Public program w/opt out	X	X*	X			
Medicare for all	X	X	X			X

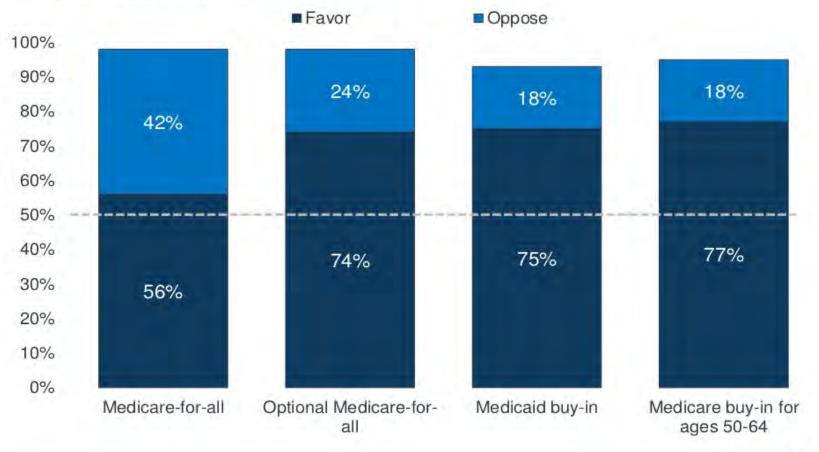
<sup>\*</sup>Funded through member premium



Figure 3

## Broad Support For Proposals To Expand Public Health Insurance Programs

Percent who favor or oppose:



SOURCE: KFF Health Tracking Poll (January 9-14, 2019). See topline for full question wording and response options.





Figure 6

## Public's Views Of Medicare-For-All Can Shift Significantly After Hearing Information

Do you favor or oppose having a national health plan, sometimes called Medicare-for-all?

Guarantee health insurance as a right for all

Threaten the current Medicare program

Lead to delays in people getting some medical tests

and treatments



#### Would you favor or oppose a national Medicare-for-all plan if you heard that it would do the following?

Americans

Eliminate all health insurance premiums and reduce out-of-pocket health care costs for most Americans

Eliminate private health insurance companies

Require most Americans to pay more in taxes

71%

27%

67%

30%

580

600

 71%
 27%
 +45

 67%
 30%
 +37

 37%
 58%
 -21

 37%
 60%
 -23

 32%
 60%
 -28

 26%
 70%
 -44

SOURCE: KFF Health Tracking Poll (conducted January 9-14, 2019). See topline for full question wording and response options.



#### Medicare buy-in for older adults

#### **Program description**

- Option for individuals age 50 to 64 to buy-in to Medicare
- Option to buy private Medicare Advantage, Part D, or Med Supp plans

#### **Financing**

- Funded through new Medicare buy-in trust fund
- Financed through premiums

### Member premium and cost sharing

- Generally community rated (one bill varies premiums by geography)
- Individuals selecting Medicare Advantage would pay any applicable additional premium
- ACA premium and cost sharing subsidies generally apply
- No OOP limits unless choosing Medicare Advantage, Med Supp, or if eligible for CSRs.

#### **Provider payments**

- Provider payment rates set to Medicare fee-schedule
- Secretary of Health and Human Services negotiates drug prices for Medicare and buy-in plan

#### Role of private insurance

Current sources of private coverage continue



# Actuarial implications of a Medicare Advantage buy-in option for older adults

#### **Actuarial considerations**

Eligibility requirements

Benefits and cost sharing

Pricing considerations

Financing considerations

Risk mitigation programs for private markets

Subsidies

Interactions with existing markets

Selection considerations

Provider reimbursement

Participation requirements



#### Case study:

How many members would be eligible for a buy-in option?

How might premium for a Medicare Advantage (MA) buy-in option compare to existing ACA coverage options?

How would existing ACA options change in the presence of an MA buy-in option?

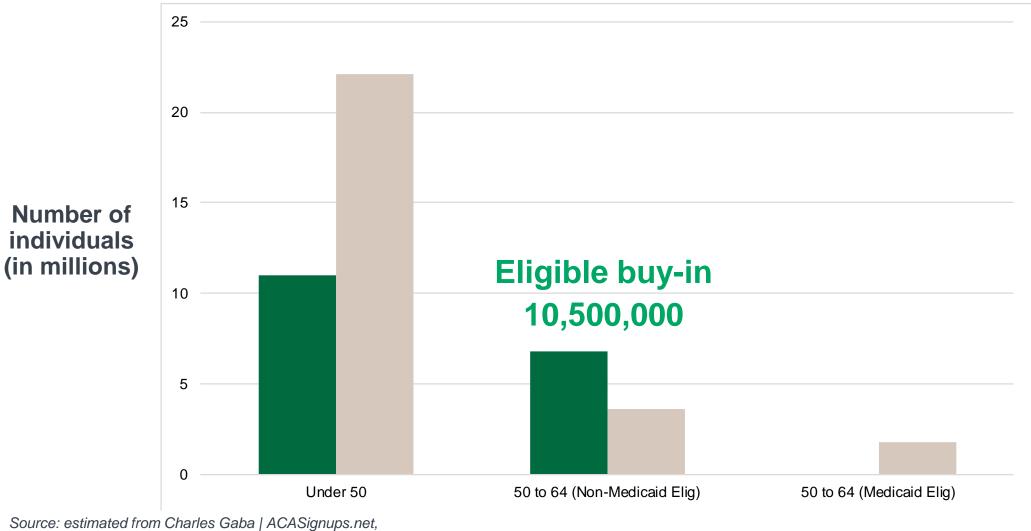
#### Important note:

Healthcare system changes may take time (many years) to reach equilibrium. The case study in this presentation assumes rational pricing in a steady state market.

Eligibility	50-64 Not eligible for employer sponsored coverage Not eligible for Medicaid or otherwise eligible for Medicare (e.g., due to disability)



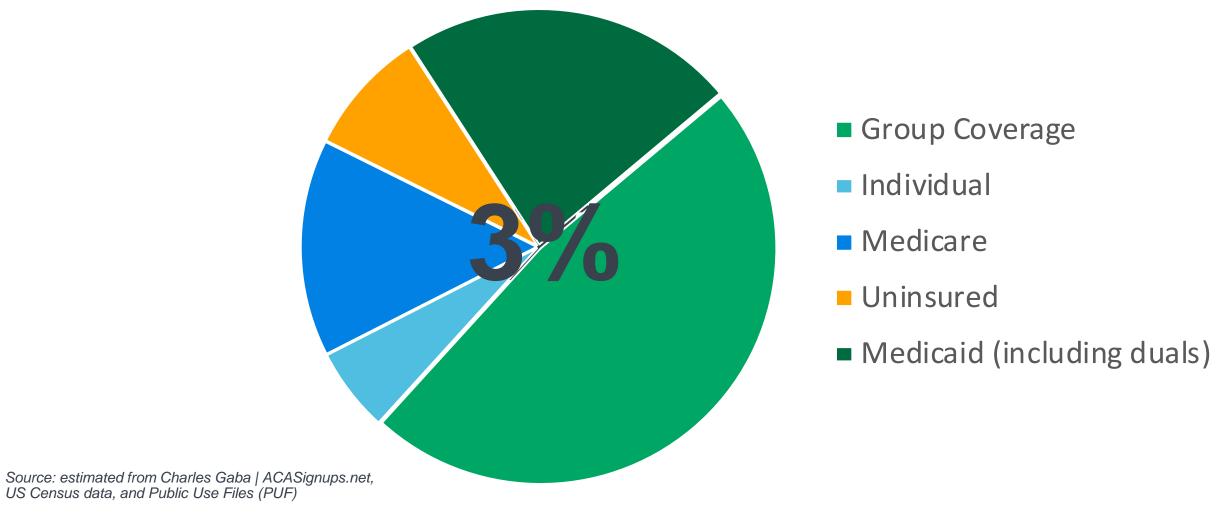
#### Estimated potential buy-in eligibility (2017 population)



US Census data, and Public Use Files (PUF)



#### Estimated potential buy-in eligibility (2017 population)





Eligibility	50-64 Not eligible for employer sponsored coverage Not eligible for Medicaid or otherwise eligible for Medicare (e.g., due to disability)
Risk pools	Buy-in population separately rated from existing MA-PD population Costs funded through member premium and subsidies

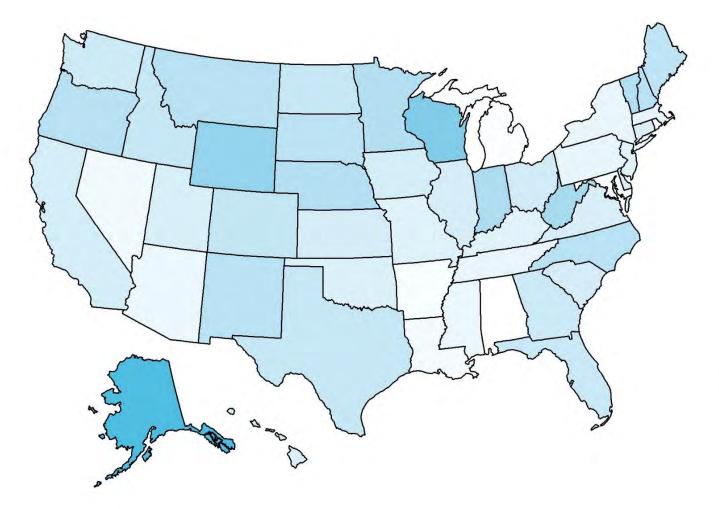


Eligibility	50-64 Not eligible for employer sponsored coverage Not eligible for Medicaid or otherwise eligible for Medicare (e.g., due to disability)
Risk pools	Buy-in population separately rated from existing MA-PD population Costs funded through member premium and subsidies
Fee schedule	Providers accept set rates at 100% of the Medicare fee schedule
	SPOILER ALERT



## Estimated Commercial group provider reimbursement rates as a percent of the Medicare fee schedule (2018)

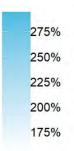
All services, excluding Rx



Min: 155%

**Median: 195%** 

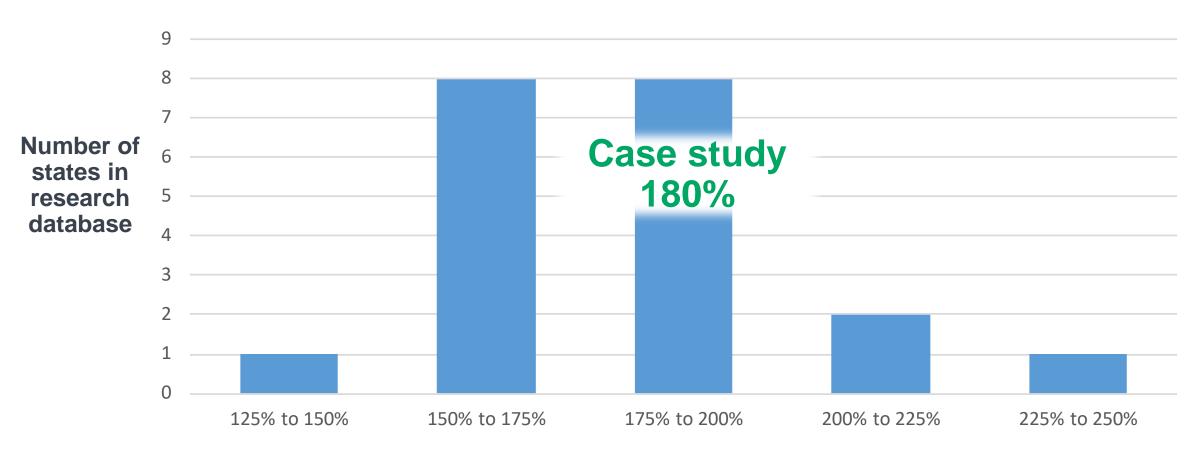
Max: 290%





## Estimated ACA individual market provider reimbursement rates as a percent of the Medicare fee schedule (2017)

All services, excluding Rx







Risk pools	Not eligible for Medicaid or otherwise eligible for Medicare (e.g., due to disability)  Buy-in population separately rated from existing MA-PD population  Costs funded through member premium and subsidies
Fee schedule	Providers accept set rates based on the Medicare fee schedule
Benefits and network	Benefits largely similar to a zero-premium Medicare Advantage plan available in the market (actuarial value around 85%)



Assumed benefits will be largely similar to a zero-premium Medicare Advantage plan available in the market (actuarial value around 85%)

Benefit requirement	Medicare Advantage	ACA individual market
Covered services	<ul> <li>Must cover all Medicare-covered services</li> <li>Most MA-PD plans include supplemental benefits</li> </ul>	<ul> <li>Must cover essential health benefits and any state mandated benefits</li> </ul>
Member cost sharing	<ul> <li>At least as rich as Original Medicare</li> <li>No annual maximums allowed</li> <li>Zero-dollar preventive</li> </ul>	<ul> <li>Metal level AV ranges</li> <li>No annual maximums allowed</li> <li>Zero-dollar preventive</li> </ul>
Out of pocket limits <sup>1</sup>	<ul> <li>Separate for medical and Rx</li> <li>\$6,700 for medical</li> <li>~\$5,100 (+5% thereafter) for Rx</li> </ul>	<ul> <li>Combined for all services</li> <li>\$7,900 individual / \$15,800 families</li> <li>CSR plans have lower OOP limits</li> </ul>

1. 2019 limits.



Rating factors	Buy-in premiums are community rated within a service area (e.g., state)
Benefits and network	Benefits largely similar to a zero-premium Medicare Advantage plan available in the market (actuarial value around 85%)
Fee schedule	Providers accept set rates based on the Medicare fee schedule
Risk pools	Buy-in population separately rated from existing MA-PD population Costs funded through member premium and subsidies
Eligibility	50-64 Not eligible for employer sponsored coverage Not eligible for Medicaid or otherwise eligible for Medicare (e.g., due to disability)



	Buy-in admin to levels reported in 2018 MA-PD bids
Retention	ACA admin and margin levels similar to levels filed in 2019
Rating factors	Buy-in premiums are community rated within a service area (e.g., state)
Benefits and network	Benefits largely similar to a zero-premium Medicare Advantage plan available in the market (actuarial value around 85%)
Fee schedule	Providers accept set rates based on the Medicare fee schedule
Risk pools	Buy-in population separately rated from existing MA-PD population Costs funded through member premium and subsidies
Eligibility	50-64 Not eligible for employer sponsored coverage Not eligible for Medicaid or otherwise eligible for Medicare (e.g., due to disability)



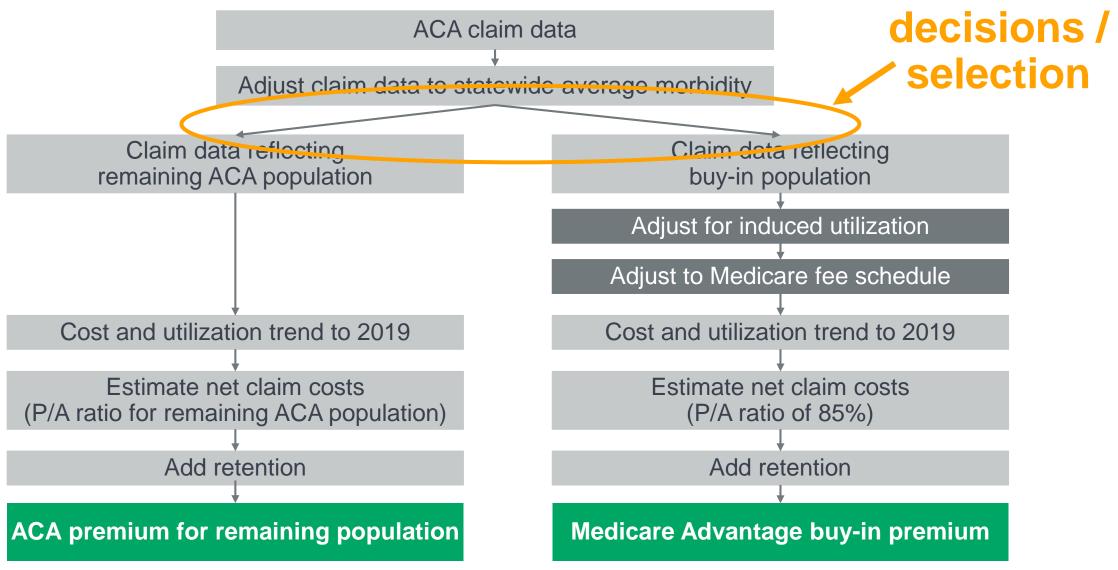
Risk adjustment	A risk adjustment program is in place that results in premiums that reflect the health status of the average buy-in member
Retention	ACA admin and margin levels similar to levels filed in 2019 Buy-in admin similar to actual 2017 levels reported in 2019 MA-PD bids
Rating factors	Buy-in premiums are community rated within a service area (e.g., state)
Benefits and network	Benefits largely similar to a zero-premium Medicare Advantage plan available in the market (actuarial value around 85%)
Fee schedule	Providers accept set rates based on the Medicare fee schedule
Risk pools	Buy-in population separately rated from existing MA-PD population Costs funded through member premium and subsidies
Eligibility	50-64 Not eligible for employer sponsored coverage Not eligible for Medicaid or otherwise eligible for Medicare (e.g., due to disability)



Subsidies	the average buy-in member  Individuals can use advanced premium tax credits (APTCs) from the ACA market for buy-in Cost sharing subsidies (CSRs) not applicable at Medicare Advantage benefit levels
Retention  Risk adjustment	ACA admin and margin levels similar to levels filed in 2019 Buy-in admin similar to actual 2017 levels reported in 2019 MA-PD bids  A risk adjustment program is in place that results in premiums that reflect the health status of
Rating factors	Buy-in premiums are community rated within a service area (e.g., state)
Benefits and network	Benefits largely similar to a zero-premium Medicare Advantage plan available in the market (actuarial value around 85%)
Fee schedule	Providers accept set rates based on the Medicare fee schedule
Risk pools	Buy-in population separately rated from existing MA-PD population Costs funded through member premium and subsidies
Eligibility	50-64 Not eligible for employer sponsored coverage Not eligible for Medicaid or otherwise eligible for Medicare (e.g., due to disability)



#### **Premium development**





#### **Selection considerations**

Individuals try to select healthcare coverage options that are in their best interest

#### **Price**

Individuals generally seek the highest value for the lowest price

#### Benefit design

Individuals with perceived healthcare needs tend to seek a plan design with broad coverage (or coverage of particular services or drugs) and lower cost sharing

#### **Choice in healthcare providers**

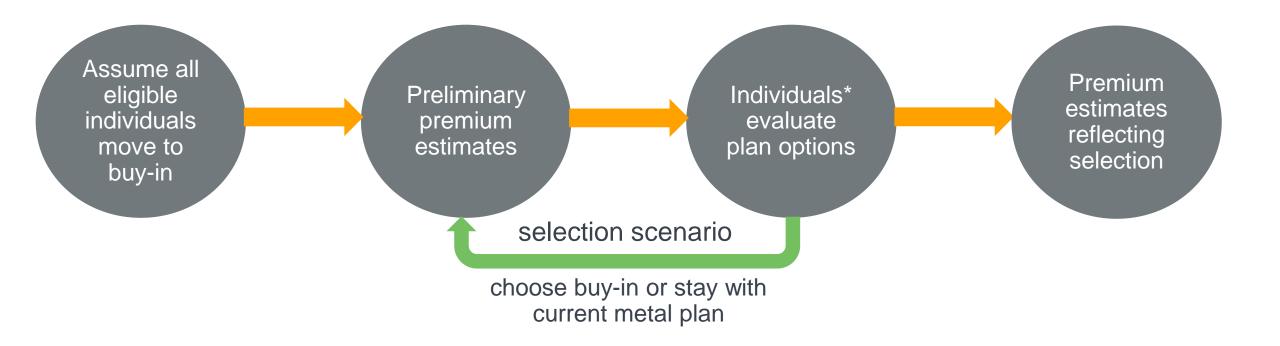
Individuals value choice in healthcare providers, so a broader network is generally more valuable than a more restricted network, particularly for individuals with perceived healthcare needs

#### Familiarity or preference in insurance carrier / customer service

Individuals may be reluctant to switch plans if they are familiar with their existing plan unless the perceived value of switching is more significant



#### Premium development process with selection



<sup>\*</sup>Individuals modeled in cohorts based on age, rating area, and metal level (including silver CSR variants)

Decisions based on a comparison of cost sharing (calc'd from risk adjusted claims) and premium under the ACA and buy-in options



## **Premium development scenarios**

# All eligible members choose buy-in

 Assumes all eligible individuals enrolled in ACA-compliant plans move to the buy-in plan

#### High selection

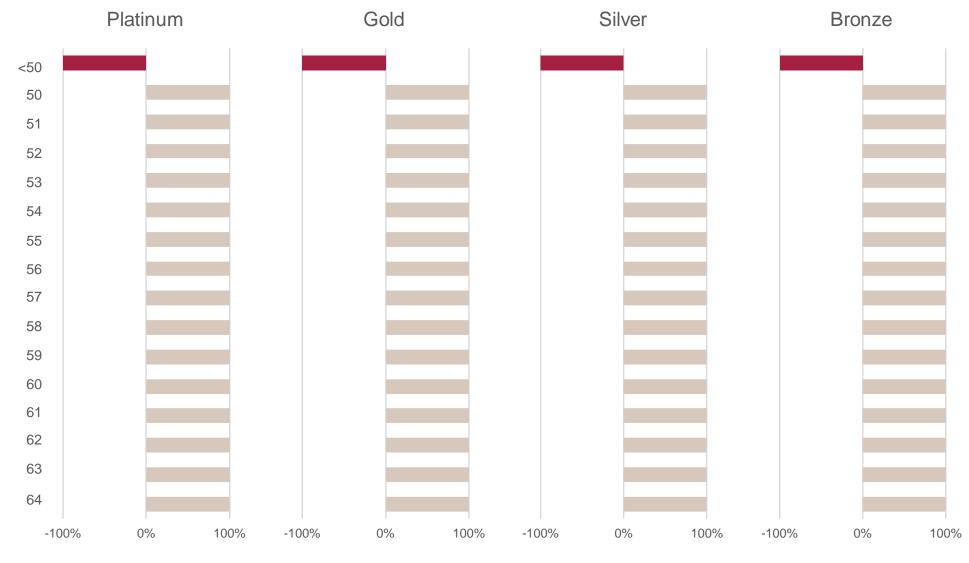
 Individuals choose plan (current ACA plan or buyin) expected to have the lowest out-of-pocket cost (cost sharing + premium)

#### Practical selection

- Individuals consider
   plans based on expected
   cost, but don't always
   choose the lowest option
- The likelihood of choosing the lowest option increases as the differential increases



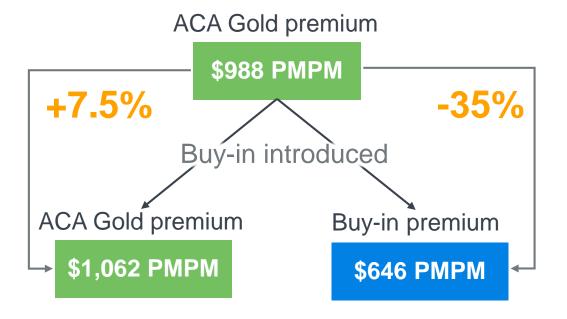
# Population – all eligible members choose buy-in





# Premium options before and after buy-in introduced (before subsidies)

# All eligible choose buy-in 57-year old



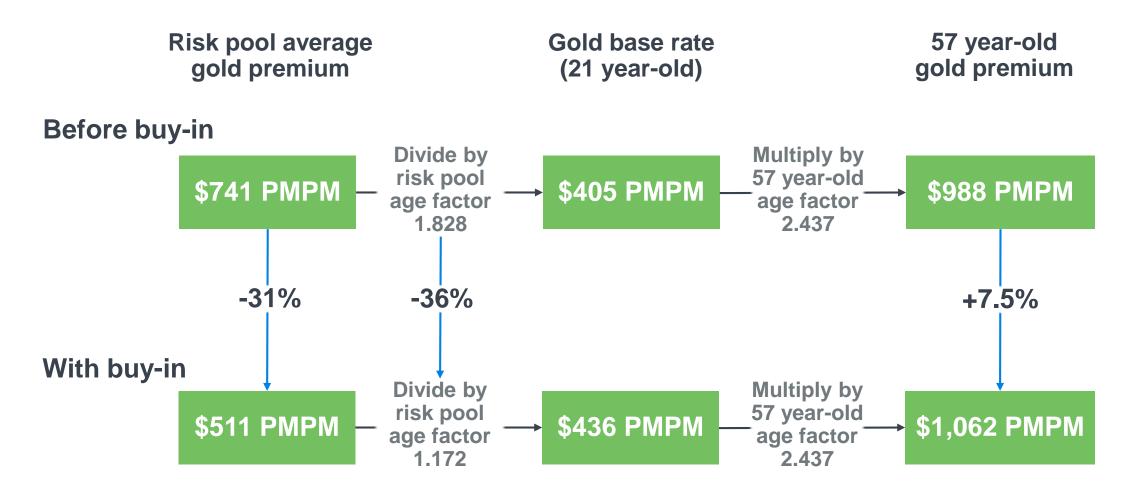


# Wait, what?





# Why ACA rates could increase with buy-in option





# **Scenario comparison**

#### 57 year-old | Average rating area

Scenario	ACA Gold premium PMPM	MA buy-in premium PMPM	Difference PMPM	Average ACA age
ACA option before buy-in	\$988	N/A	N/A	51
All eligible choose buy-in	\$1,062	\$646	\$416	32



#### Premium development scenarios

#### All eligible members choose buy-in

 Assumes all eligible individuals move to the buy-in plan

#### **High selection**

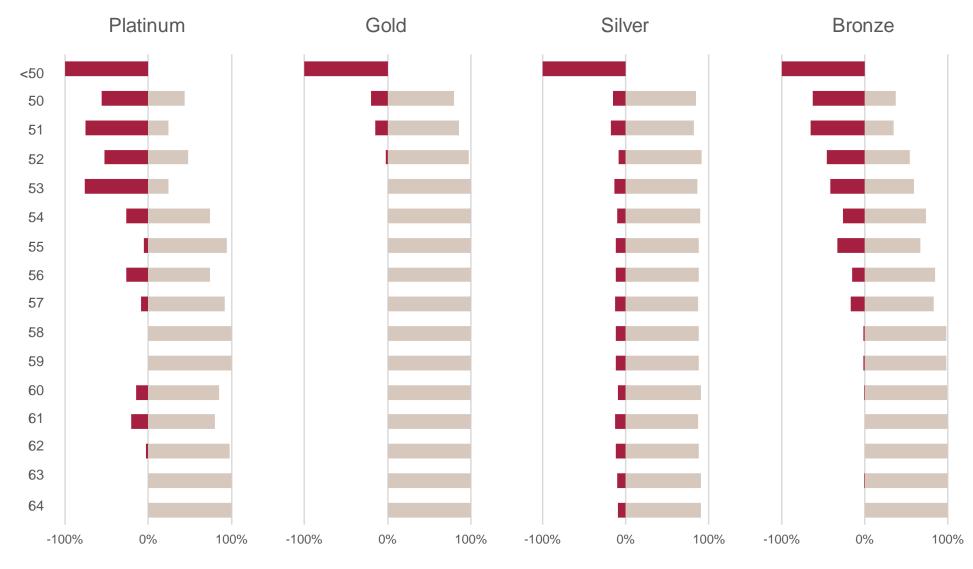
 Individuals choose plan (current ACA plan or buyin) expected to have the lowest out-of-pocket cost (cost sharing + premium)

#### Practical selection

- Individuals consider
   plans based on expected
   cost, but don't always
   choose the lowest option
- The likelihood of choosing the lowest option increases as the differential increases



# **Population – high selection**





# **Scenario comparison**

#### 57 year-old | Average rating area

Scenario	ACA Gold premium PMPM	MA buy-in premium PMPM	Difference PMPM	Average ACA age
ACA option before buy-in	\$988	N/A	N/A	51
All eligible choose buy-in	\$1,062	\$646	\$416	32
High selection	\$1,084	\$638	\$446	40



## Premium development scenarios

#### All eligible members choose buy-in

 Assumes all eligible individuals move to the buy-in plan

#### High selection

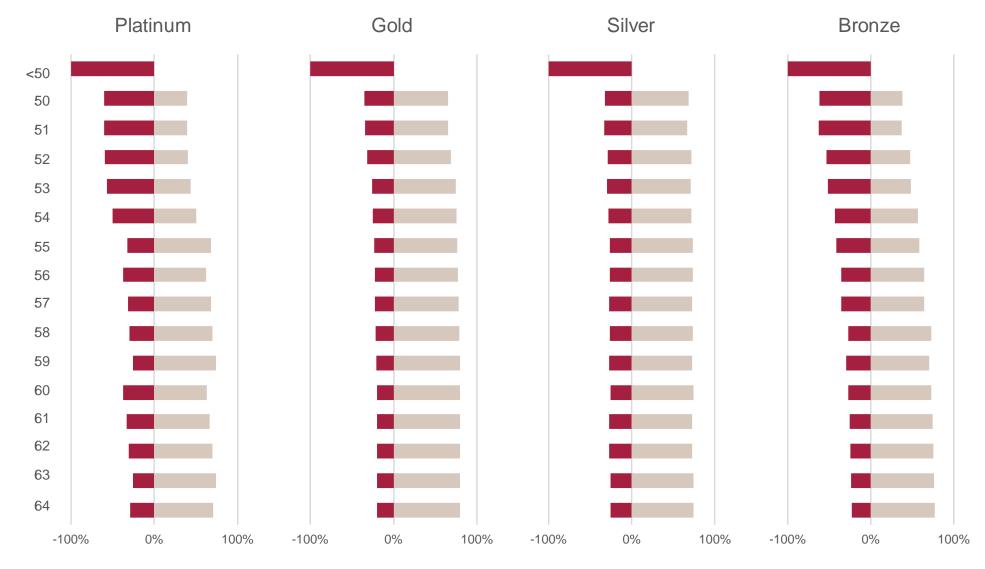
 Individuals choose plan (current ACA plan or buyin) expected to have the lowest out-of-pocket cost (cost sharing + premium)

#### **Practical selection**

- Individuals consider plans based on expected cost, but don't always choose the lowest option
- The likelihood of choosing the lowest option increases as the differential increases



# Population – practical selection





# **Scenario comparison**

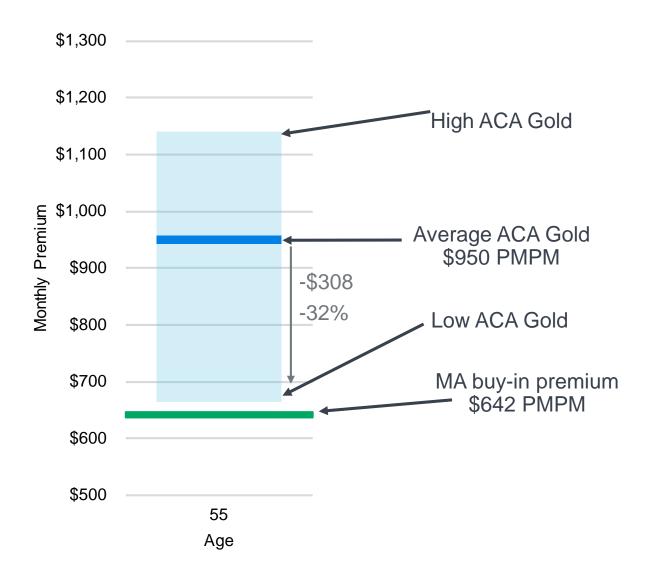
#### 57 year-old | Average rating area

Scenario	ACA Gold premium PMPM	MA buy-in premium PMPM	Difference PMPM	Average ACA age
ACA option before buy-in	\$988	N/A	N/A	51
All eligible choose buy-in	\$1,062	\$646	\$416	32
High selection	\$1,084	\$638	\$446	40
Practical selection	\$1,039	\$642	\$397	45



## **Premium results – practical selection**

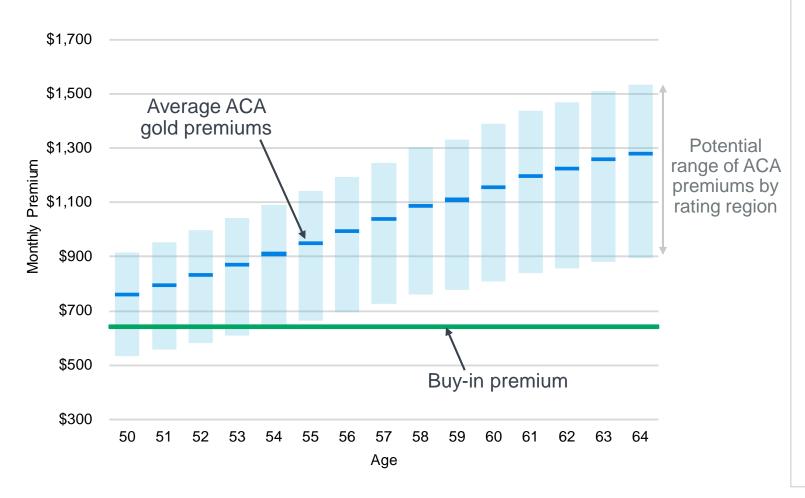
#### **Gold premium comparison**





#### Premium results - practical selection

#### **Buy-in compared to ACA Gold**



# **Key drivers of**premium differentials

1. Provider reimbursement rates

ACA at 180% of Medicare
Buy-in at 100% of Medicare

2. Age rating factors

ACA at allowable rating factors Buy-in community rated

3. Area rating factors

ACA at allowable area rating factors
Buy-in community rated

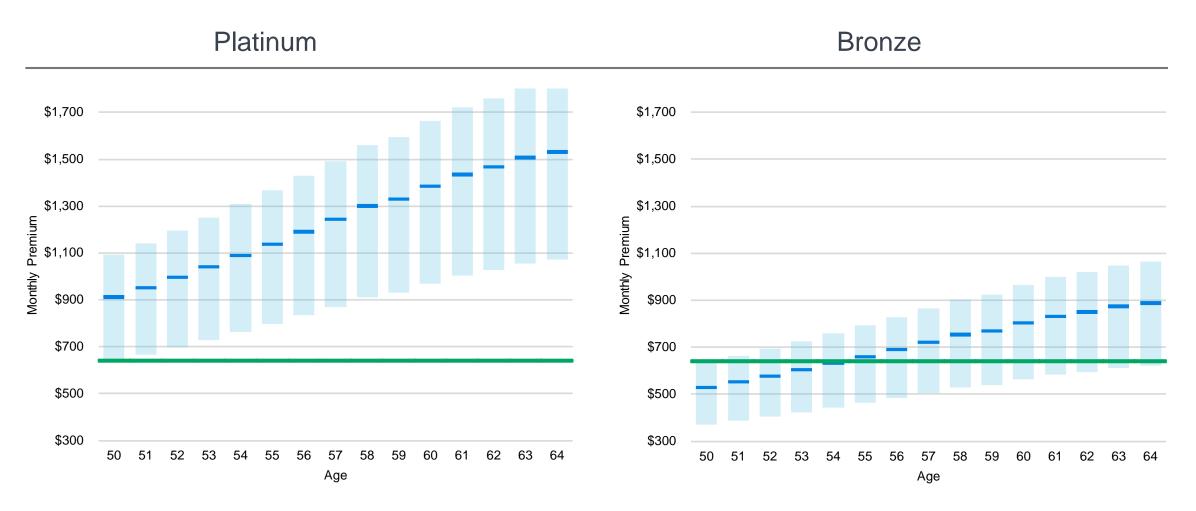
4. CSR loading on ACA plans

Some states load silver only Some states load all plans



# Premium results – practical selection

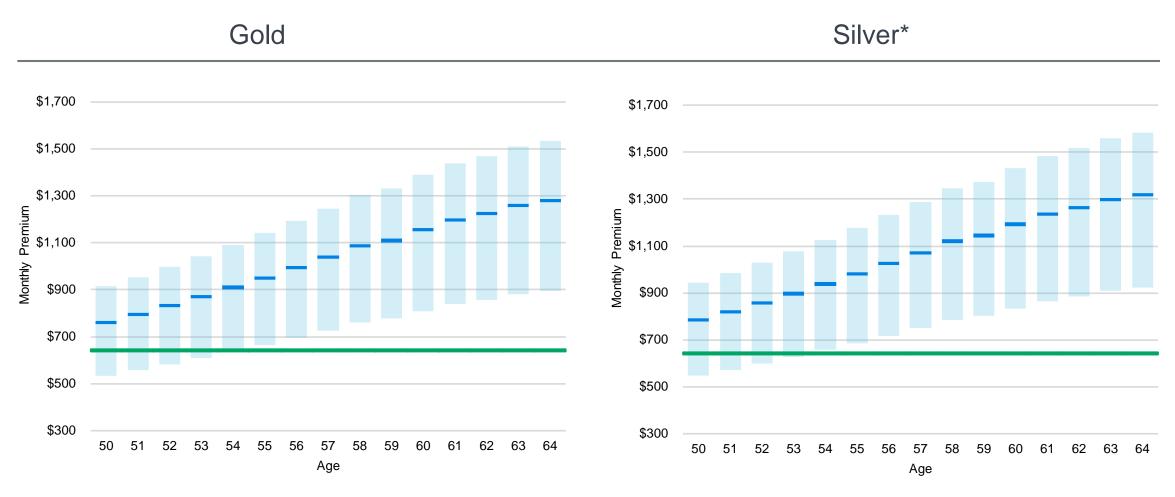
#### **Buy-in compared to other metal levels**





# Premium results – practical selection

#### **Buy-in compared to other metal levels**





#### What about subsidies?

- Advanced premium tax credits (APTCs) are based on:
  - 1. Second lowest ACA silver plan premiums available in the marketplace, which vary by region and age
  - 2. Income level
- ACA premium subsidies could cover some or all of the buy-in premium, with large variation by region, demographic, and income level.



# Subsidy interactions with the buy-in

- For two individuals living in the same region with the same income, the subsidy for the older individual will be higher (because they have a higher age rating factor)
- The older individual will have the same buy-in premium as the younger individual (community rating)
- Therefore, the older individual will have a lower buy-in premium than the younger individual after subsidies.
  - Subsidized by younger buy-in members through community rated buy-in premiums
  - Higher premium subsidies because of ACA age rating



## Subsidy interactions with the buy-in

- For two individuals who are the same age and have the same income, but live in different regions, the subsidy will be higher for the person living in the region that has a higher second lowest silver premium. Regional variations in premium are often significant in the ACA market.
- The buy-in premium before subsidies will be the same for these individuals.
- The person living in the higher cost area will have a lower buy-in premium after subsidies than the person living in the lower cost area.
  - Subsidized by lower cost regions through community rated buy-in premiums
  - Higher premium subsidies because of area rating factors
- It is likely that private Medicare Advantage plans will establish multiple service areas within a larger region to address some of these opportunities for selection.

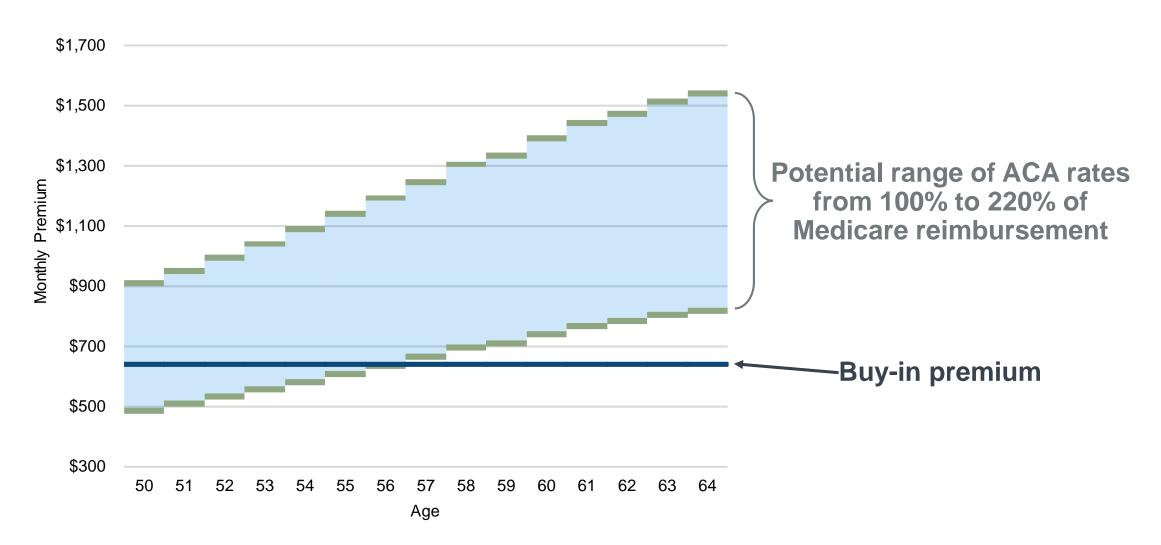


 Provider reimbursement rates are the primary driver of differentials between ACA and buy-in premium rates.

The differential between ACA and buy-in premiums would diminish significantly to the extent that existing ACA provider reimbursement levels are already close to Medicare allowed fees.



#### Potential variation in provider reimbursement rates





- Provider reimbursement rates are the primary driver of differentials between ACA and buy-in premium rates.
- Buy-in premiums could be much lower than ACA marketplace options for many individuals, and for others they could be higher. Other than ACA provider reimbursement levels, age and rating region are among the key drivers of differentials between ACA and buy-in premiums.



- Provider reimbursement rates are the primary driver of differentials between ACA and buy-in premium rates.
- Buy-in premiums could be much lower than ACA marketplace options for many individuals, and for others they could be higher. Other than ACA provider reimbursement levels, age and rating region are among the key drivers of differentials between ACA and buy-in premiums.
- Premiums in the ACA market would change if a buy-in is introduced. The change will depend on the number of buy-in members and their cost in relation to the younger population and the ACA age rating curve. Premiums in the ACA market could increase.



- Provider reimbursement rates are the primary driver of differentials between ACA and buy-in premium rates.
- Buy-in premiums could be much lower than ACA marketplace options for many individuals, and for others they could be higher. Other than ACA provider reimbursement levels, age and rating region are among the key drivers of differentials between ACA and buy-in premiums.
- Premiums in the ACA market would change if a buy-in is introduced. The change will depend on the number of buy-in members and their cost in relation to the younger population and the ACA age rating curve. Premiums in the ACA market could increase.
- If subsidies are transferable to the buy-in program, they could cover a significant portion of premium, potentially all premium in some cases.



- Provider reimbursement rates are the primary driver of differentials between ACA and buy-in premium rates.
- Buy-in premiums could be much lower than ACA marketplace options for many individuals, and for others they could be higher. Other than ACA provider reimbursement levels, age and rating region are among the key drivers of differentials between ACA and buy-in premiums.
- Premiums in the ACA market would change if a buy-in is introduced. The change will depend on the number of buy-in members and their cost in relation to the younger population and the ACA age rating curve. Premiums in the ACA market could increase.
- If subsidies are transferable to the buy-in program, they could cover a significant portion of premium, potentially all premium in some cases.
- Subsidies could result in older individuals or individuals in higher cost regions paying less than younger individuals or individuals in lower cost regions under the buy-in plan.



# Key potential challenges

- Reductions in provider reimbursement rates under a buy-in would translate to reductions in revenue for providers absent other changes (such as changes in commercial fee schedules, practice patterns, shared savings arrangements, etc.).
- A buy-in option has the potential to further fragment the ACA markets and introduce selection opportunities that may be challenging or impossible to predict or control. Adding to this issue is the fact that the individual market is small and relatively unstable already.
- A buy-in program creates a new layer of complexity in an already complex healthcare system.



# **Final thoughts**

- It is critical for stakeholders and policymakers to understand the actuarial implications of policy changes.
- The healthcare system is complex, with many interactions between markets and stakeholders.
   Preconceptions may not match reality.
- Actuaries are positioned to play a key role in evaluating and managing the risks associated with future healthcare system changes.





# Thank you

Lindsy Kotecki, FSA, MAAA lindsy.kotecki@milliman.com

Stan Westrom, ASA, MAAA stan.westrom@milliman.com