

# PUBLIC SUBMISSION

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Early Retiree Reinsurance Program Survey of Plan Sponsors (CMS-10408)

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Early Retiree Reinsurance Program Survey of Plan Sponsors (CMS-10408)

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## General Comment

Regarding question #17, employers will have a very difficult time in estimating the cost savings. In most all cases, the actual cost savings amount will be unknown or even unknowable as it pertains to what the costs would have been if the particular program or procedure were not in place. It's theoretical.

Cost savings programs such as disease management and others have long been criticized by employers and others for not having a tangible or measurable "return on investment", yet that's essentially what CMS is asking employers to estimate on this question.

Ultimately, employers will look to either consultants or providers of those programs for an estimate, and in many cases the estimate will be a "blind guess" at best.

Perhaps instead of quantifying the savings, CMS could ask employers to list the estimated number of participants who have the high-cost conditions?