

January 27, 2025

Centers for Medicare & Medicaid Services  
Department of Health and Human Services  
Attention: CMS-4208-P  
P.O. Box 8013  
Baltimore, MD 21244-8013

**RE: Medicare and Medicaid Programs; Contract Year 2026 Policy and Technical Changes to the Medicare Advantage Program, Medicare Prescription Drug Benefit Program, Medicare Cost Plan Program, and Programs of All-Inclusive Care for the Elderly (CMS-4208-P)**

Dear Acting Administrator,

On behalf of the Association of Black Cardiologists (ABC), we appreciate the opportunity to provide comments on the proposed rule related to the *Medicare and Medicaid Programs; Contract Year 2026 Policy and Technical Changes to the Medicare Advantage Program, Medicare Prescription Drug Benefit Program, Medicare Cost Plan Program, and Programs of All-Inclusive Care for the Elderly* (proposed rule). We commend CMS for its efforts to advance opportunities for improving patient access to care and addressing administrative inefficiencies. In this letter, we provide our strong support for three critical policy areas: expanding Medicare coverage for anti-obesity medications (AOMs), reforming prior authorization practices to reduce administrative burdens, and ensuring the responsible integration of artificial intelligence (AI) in healthcare to promote better access and efficiency.

**About the Association of Black Cardiologists**

Founded in 1974, the Association of Black Cardiologists (ABC) is a nonprofit organization with a global membership of over 2,000, including health professionals, community health advocates, and institutional members. ABC's mission is to promote the prevention and treatment of cardiovascular disease, including stroke, in Black populations and other minority groups, striving for health equity through the elimination of disparities. ABC's inclusive membership welcomes all who align with its mission and vision. Through advocacy, education, research, and partnerships, ABC advances cardiovascular health and improves outcomes in communities nationwide. Learn more at [www.abc cardio.org](http://www.abc cardio.org).

**1. Inclusion of Anti-Obesity Medications**

Obesity is directly linked to hypertension, dyslipidemia, and type 2 diabetes, all of which are major contributors to CVD. In fact, in just a few years, half of the U.S. population will be living with obesity, which underscores a stark reality of this national epidemic. Furthermore, obesity is not just a personal struggle; it is a community challenge that exacerbates a myriad of health issues, from cardiovascular disease to type 2 diabetes, amputations, Alzheimer's, maternal health, and certain cancers.

Studies show that sustained weight loss can significantly reduce these risk factors, improve heart function, and lower the incidence of myocardial infarction and stroke. For patients unable to achieve weight loss through lifestyle changes alone, AOMs serve as a clinically validated adjunct therapy to mitigate these risks.

Additionally, obesity disproportionately impacts rural populations, including racial and ethnic minorities, and low-income individuals. By including AOMs in Medicare coverage, CMS will enable equitable access to these critical therapies, aligning with broader efforts to address health disparities and promote preventive care.

**2. Reducing Administrative Burdens: Prior Authorization**

ABC commends CMS’s ongoing efforts to streamline administrative processes and reduce barriers to care. PA requirements, while intended to ensure appropriate use of therapies, often delay timely access to care and impose significant administrative burdens on healthcare providers. Simplifying administrative procedures will allow for more individuals to get the care they need in a timely manner.

**3. Leveraging Artificial Intelligence with Safeguards**

ABC supports the thoughtful use of AI in healthcare to enhance access to care and streamline clinical decision-making. AI has the potential to improve efficiency and access to healthcare, particularly in identifying at-risk patients and optimizing obesity management.

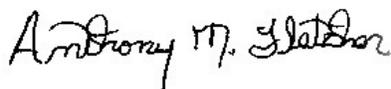
However, we emphasize the importance of implementing strong guardrails to prevent AI systems from exacerbating health inequities. We encourage CMS to take actions that ensure transparency in AI algorithms used in decision-making processes and utilize regular audits of AI systems to identify and mitigate biases.

While AI can serve as a transformative tool, it must be deployed responsibly to avoid unintended harm to vulnerable populations.

**4. Conclusion**

Thank you for considering our comments. Please feel free to contact Tammy Boyd, Senior Vice President, Government Affairs & Strategic Alliances at [tboyd@abc cardio.org](mailto:tboyd@abc cardio.org) for additional information or to discuss our position further.

Sincerely,



Anthony M. Fletcher, MD, FACC, FSCAI  
President  
Association of Black Cardiologists