



November 12, 2025

Honorable Mehmet Oz
Administrator
Centers for Medicare & Medicaid Services (CMS)
U.S. Department of Health and Human Services

Dear Administrator Oz:

On behalf of the National Association of Professional Insurance Agents (PIA)¹, we write to express deep concern regarding emerging practices in the Medicare Advantage and Part D markets that threaten consumer access, undermine market integrity, and marginalize the role of licensed insurance agents.

Across the country, seniors are facing reduced access to quality Medicare plans as carriers implement troubling strategies—including removing enrollment applications from websites, discouraging producers from selling certain products, and slashing agent compensation mid-year. These actions not only destabilize the marketplace but also jeopardize the ability of seniors to receive trusted, professional guidance when selecting coverage.

Regulatory precedent and state action

We commend the Idaho Department of Insurance for its leadership in issuing Bulletin No. 25-06, which identifies these practices as unfair trade practices and outlines clear expectations for carrier conduct. Specifically, the bulletin requires:

- Enrollment applications to be accessible both online and in print.
- Carriers refrain from discouraging producers from marketing or selling their products.

¹ Founded in 1931, PIA is a national trade association that represents independent insurance agents in all 50 states, Puerto Rico, and the District of Columbia. PIA members are small business owners and insurance professionals.

- Compensation structures remain consistent throughout the plan year, especially when built into rate development.

PIA strongly supports Idaho's framework and urges CMS to adopt similar standards to protect consumers and uphold fair competition.

Recommended CMS actions

To address these issues, we respectfully request that CMS:

- Investigate carrier practices that reduce agent compensation or restrict access to filed products.
- Issue guidance clarifying CMS's position on mid-year commission changes and producer access.
- Promote transparency in carrier compensation policies, including advance notice and justification for changes.

Conclusion

Licensed insurance agents play a vital role in helping Medicare beneficiaries navigate complex coverage options. Undermining their ability to serve consumers not only harms seniors but erodes the integrity of the Medicare marketplace. PIA stands ready to work with CMS, state regulators, and industry stakeholders to implement reforms that protect consumers and preserve the essential role of agents.

Sincerely,



Mike Skiados, MBA, CAE

CEO

National Association of Professional Insurance Agents