



January 15, 2025

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

Submitted electronically via Regulations.gov (Docket No. CMS-4208-P)

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, Section 1.B.4. Part D Coverage of Anti-Obesity Medications (§ 423.100) and Application to the Medicaid Program

To Whom It May Concern,

The Alliance for Women's Health and Prevention (AWHP) strongly supports the proposal by the Centers for Medicare & Medicaid Services (CMS) to expand coverage for obesity medications in Medicare Part D and Medicaid. As an organization focused on women's preventive health, AWHP recognizes that there is an important link between obesity and women's health and applauds CMS for taking this important step toward recognizing obesity as the serious, but treatable, chronic disease that it is. Finalizing this proposal is crucial to ensuring that millions of women living with obesity can access this important treatment.

Obesity impacts [1 in 3](#) American women, and has a particular impact on women of color. It is associated with over [200 other health complications](#), such as sleep apnea, heart disease and diabetes, as well as those that specifically impact women, like breast and ovarian cancers and fertility issues. If we are to make progress against these and other chronic diseases, we must ensure that people living with obesity have affordable and equitable access to evidence-based treatment options, including obesity medications.

Obesity has staggering financial consequences for people living with the disease, for our nation's economy and for the U.S. healthcare system. Collectively, diseases linked to overweight and obesity cost the U.S. healthcare system [\\$1.72 trillion annually](#)—with women accounting for [70% of these costs](#). In 2023, obesity accounted for [\\$425.5 billion](#) in economic costs for U.S. businesses and employees. According to one estimate, Medicare coverage for obesity medications could [save the program between \\$175-245 billion](#) in the first decade alone. The majority of these savings would accrue to Medicare Part A by reducing the need for hospital inpatient stays and skilled nursing care.

Women with obesity are also more likely to face harmful social stigma and discrimination. According to a *GlobalData* report, women with overweight or obesity earn [9% less in wages](#), on average, than women of a healthy weight. Women with obesity are also [less likely](#) to be promoted at work, and as many as [69% of women](#) with obesity face weight bias in healthcare settings.

Unfortunately, despite obesity's serious physical, social and financial impacts, misunderstandings of the disease have led to health insurance barriers that keep the full range of obesity treatment options, particularly medications, out of reach for many women. Medicare currently does not cover obesity medications for weight loss and only [15 state Medicaid programs](#) offer this coverage. [Less than half of U.S. employers](#) currently cover obesity medications, although this number is expected to rise.

AWHP strongly supports CMS' proposal to provide coverage for obesity medications for Medicare and Medicaid beneficiaries living with obesity. **We believe that it's only fair for obesity care to be covered just**

as care for other chronic diseases is covered and urge CMS and the Trump-Vance administration to finalize this proposal.

Last year, AWHP, along with 20 leading stakeholders from across the healthcare community, launched the [EveryBODY Covered campaign](#), working to advance women's health by improving access to comprehensive obesity care for all. We stand ready as a resource to address any questions that you may have and appreciate your attention to this critical women's health issue.

Respectfully,

Millicent Gorham, CEO, Alliance for Women's Health and Prevention

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About AWHP

The Alliance for Women's Health and Prevention is a non-partisan 501(c)(4) non-profit organization working to ensure that all women and girls have access to high-quality preventive care. Our mission is to advance policy that drives equitable access and prevents the burden and progression of disease to improve the lives and health of all women and girls.

For more information on AWHP, please visit WomensHealthandPrevention.org and follow us on [LinkedIn](#) and X [@AWHPOrg](#).