Subsidy Design in Privately-Provided Social Insurance: Lessons from Medicare Part D

Francesco Decarolis, Maria Polyakova, Stephen P. Ryan*

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Abstract

The efficiency of publicly-subsidized, privately-provisioned social insurance programs depends on the interaction between strategic insurers and the subsidy mechanism. We study this interaction in the context of Medicare’s prescription drug coverage program. We find that the observed mechanism is successful in keeping “raise-the-subsidy” incentives relatively low, acts much like a flat voucher, and obtains a level of welfare close to the optimal voucher. Across a range of counterfactuals, we find that more efficient subsidy mechanisms share three features: they retain the marginal elasticity of demand, limit the exercise of market power, and preserve the link between prices and marginal costs.

JEL: I11, I18, L22, D44, H57

Keywords: Medicare; Part D; Prescription Drugs; Health Insurance; Subsidy Design; Regulation; Private Provision

*Decarolis, Bocconi University (francesco.decarolis@unibocconi.it); Polyakova, Stanford University, CESifo, and NBER (mpolyak@stanford.edu); Ryan, Washington University in St. Louis, CESifo, and NBER (stephen.p.ryan@wustl.edu). We are grateful to Mark Duggan, Liran Einav, Amy Finkelstein, Jon Gruber, Bart Hamilton, Ben Handel, Kate Ho, Thomas Jeitschko, Claudio Lucarelli, Aviv Nevo, Ariel Pakes, Nancy Rose, Marc Rysman, Bernardo Silveira, Chris Timmins, and numerous seminar participants. Decarolis is grateful to the Sloan Foundation (grant 2011-5-23 ECON) for financial support. We also gratefully acknowledge support from the National Science Foundation (SES-1357705) and the National Institute on Aging (5P01AG005842-29).
1 Introduction

Social insurance programs have traditionally been provided directly by the government. The last two decades, however, have seen an accelerating effort to move these programs to privately-provided markets with public funding and extensive regulatory oversight (McGuire et al., 2011; Gruber, 2017). Recent examples in the United States include the use of private managed care plans in Medicare and Medicaid, private insurers competing for consumers under the Health Insurance Marketplaces of the Affordable Care Act, and, the subject of this paper, the private provision of prescription drug benefits in Medicare Part D. This trend has also extended around the world to, for example, the privatization of social security benefits in Chile, and a discussion of privatizing social security, disability, and unemployment insurance systems in many OECD countries. The broad objectives of all such programs is to leverage the benefits of competition to provide high-quality services at low cost to both consumers and the government.

One critical issue that arises in such settings is how governments should determine the level and the distribution of public funding that flows into these programs. The funding is typically channeled through subsidies that are paid directly to private firms, making the question of how to tailor the subsidy mechanisms central. While answering this question in general is beyond the scope of any single paper, we contribute to the emerging academic and policy discussion of the subsidy mechanism by providing novel evidence from the Medicare Part D Prescription Drug Plan (PDP) program. Part D is an elective prescription drug insurance program available to Medicare beneficiaries that was launched in 2006 and since then has become one of the role models for privately-provided publicly-financed social insurance programs in the United States. The PDP market has several features which make it well-suited for studying subsidy mechanism design: the program has clear, well-articulated rules that allow us to cleanly model the incentives facing strategic firms; excellent data exists on potential consumers and the set of choices available to them; and a complex mechanism links equilibrium market outcomes to consumer-facing plan prices and public subsidies.

Using this rich environment, we analyze equilibrium allocations, prices, and the incidence of subsidy dollars under the existing subsidization mechanism, as well as under an array of counterfactual subsidy mechanisms that resemble a variety of policy proposals in this and related markets. To facilitate this analysis, we proceed in two steps. We posit and estimate a structural model of consumer demand and strategic insurers, respecting the many institutional details present in the market. On the demand side, we allow for risk-based selection by allowing preferences and costs to vary across six different consumer types. Allowing for risk-
based selection enables us to directly model the key difference between insurance markets and regular product markets: the marginal cost curve is an endogenous function of equilibrium prices. On the supply side, we build a profit function for insurers, accounting for a host of details such as the subsidy mechanism, risk-specific payments, reinsurance, multiple demand types, and the endogenous marginal cost function. We leverage this structural model to first estimate demand and cost primitives before turning to counterfactual simulations where we adjust the subsidy mechanism.

We find that equilibrium outcomes, and, by extension, welfare, are driven by four empirical facts. First, we estimate that consumers have relatively low intrinsic willingness-to-pay for independent prescription drug plans. This is primarily driven by the existence of a highly-subsidized close substitute - prescription drug coverage bundled with medical insurance under private Medicare managed care plans known as Medicare Advantage (MA-PD). The second, related, result is that the primary driver of welfare is the opportunity cost of government spending. We find that the sign and magnitude of our welfare estimates are dominated by the ability of the government to set subsidies to achieve optimal sorting of consumers, and risks, across different types of prescription drug coverage. Third, the observed subsidy-setting mechanism appears to be successful in keeping plans’ margins relatively low, as insurers price near marginal cost. Fourth, we find that, once one distills all of the administrative details of how the Part D market works, that the current mechanism acts much like a flat voucher and obtains a level of welfare close to the optimal voucher. However, we estimate that a social planner could do substantially better, by adjusting prices to correct our finding that consumers are purchasing too few and too socially-expensive plans relative to the social optimum.

While our estimates are specific to the context of Part D, our results suggest several key economic forces that are likely to be important in any setting with publicly-subsidized privately-provisioned goods and services. First, it is important to preserve the marginal relationship between the prices that firms set and the prices that consumers pay. This keeps the elasticity of demand relatively high, which results in more intense competition and lower prices in equilibrium. Second, consumer-facing prices should be positively related to the social cost of providing those services. Third, the relationship between subsidies and equilibrium outcomes needs to be carefully tempered to prevent strategic pricing by imperfectly competitive firms.

Our paper is related to several distinct literatures in social insurance, design of government transfers, and regulation of private markets. A large theoretical literature has
examined the role and motivation for in-kind subsidies in different sectors of the economy, while a substantial theoretical and empirical literature has studied the supply-side effects of government regulation. Laffont and Tirole (1993) gives a classic reference on the multitude of theoretical issues. Surprisingly, there has been little empirical analysis at the intersection of these literatures, even though there is a growing number of settings where in-kind subsidies affect the decisions of private strategic firms rather than individual consumers. Our paper contributes to the nascent literature at this intersection including: the early work by Gruber and Washington (2005) and Cutler and Reber (1998) on tax and employer subsidies on employer-sponsored insurance plans; conceptually-related work on government procurement in health care studied in Duggan (2004) and Duggan and Scott Morton (2006); as well as the more recent concurrent work on Medicare Advantage and the Affordable Care Act in Enthoven (2011), Frakt (2011), Decarolis (2015), Curto et al. (2015), Jaffe and Shepard (2018), Tebaldi (2017), and Polyakova and Ryan (2018). We contribute to this literature by analyzing the context of Medicare Part D, which in itself is a large market, as well as by moving the literature forward by exploring ways of incorporating non-constant marginal costs into equilibrium pricing analysis with subsidized prices.

Our paper contributes to the growing literature that analyzes the Part D program as a prominent example of introducing consumer choice in health insurance. On the demand side, a number of papers have explored the rationality of individual choices, consumer myopia, and inertia.\footnote{Including Heiss et al. (2010, 2013); Abaluck and Gruber (2011, 2016); Ketcham et al. (2012); Kesternich et al. (2013); Kling et al. (2012); Vetter et al. (2013); Winter et al. (2006); Bundorf et al. (2013); Ketcham and Simon (2008); Ketcham et al. (2015); Ericson (2014); Miller and Yeo (2014); Abaluck and Gruber (2016); Ho et al. (2015); Polyakova (2016); Heiss et al. (2016); Bundorf et al. (2018); Einav et al. (2015); Abaluck et al. (2015); Gowrisankaran et al. (2015).} A handful of existing studies on the supply side have considered the quantity and quality of the plan menu offered by Part D insurers and price responses to consumer inertia (Lucarelli et al., 2012; Ho et al., 2015; Wu, 2016; Miller and Yeo, 2015; Chorniy et al., 2014; Einav et al., 2016; Fleitas, 2017; Starc and Town, 2015). While studying a different question—the difference in cost-sharing design between independent and integrated drug plans—Starc and Town (2015) is the closest to our work in terms of the modelling approach, including the structural estimation of demand for Part D plans by consumer risk type.

The remainder of the paper proceeds as follows. Section 2 describes the institutional setting and data. Section 3 lays out the empirical model of supply and demand, while Section 4 presents model estimates. Section 5 discusses the economics forces in counterfactual subsidy mechanisms. Section 6 concludes.
2 Economic Environment and Data

2.1 Medicare Part D Primer

Medicare is a public health insurance program covering elderly and the disabled in the United States. Over 50 million individuals benefit from Medicare, which accounts for roughly $500 billion in annual budgetary outlays. The program is administered by the Centers for Medicare and Medicaid Services (CMS). Most beneficiaries become eligible for the program when they turn 65 and are automatically enrolled into insurance for inpatient (Part A) and outpatient (Part B) services under the so-called “traditional” fee-for-service Medicare. At this point consumers can make two choices. First, consumers can decide to purchase coverage for their pharmaceutical expenditures that is not included in Parts A or B. Such coverage is provided by private Prescription Drug Plans (PDP) under what is known as the Medicare Part D program. Consumers have a choice of more than a dozen PDP plans in each of the program’s 34 geographic markets. Alternatively, consumers may decide to opt out of traditional Medicare altogether and switch to a private Medicare Advantage plan for bundled inpatient, outpatient, and pharmaceutical coverage (MA-PD). MA-PD plans provide a privately administered, but publicly financed alternative to government-run Medicare.

Pharmaceutical coverage for Medicare beneficiaries is the empirical context of our analysis. This drug program (launched in 2006) is a large and rapidly growing market that accounts for about a fifth of overall federal spending in Medicare, i.e. about $100 billion. Beyond its sheer economic size, this market further plays an important role in policy making, as it has become the role model for private provision of publicly funded social insurance. Consumers in Part D bear only a fraction of the program’s cost (in total circa 15 percent) due to extensive premium subsidies and risk-equalization programs. The efficiency of the mechanism by which the government sets the premium subsidy is at the heart of our research question, so we describe it in some detail.

To determine subsidies for pharmaceutical coverage, CMS starts by collecting “bids” from insurers that should reflect the full price that an insurer would charge for an average risk beneficiary. The regulator then takes a weighted (by lagged enrollment shares) average of these bids across all Part D plans across all markets. Consumer-facing premium for each plan is set by CMS as 25 percent of the national bid average plus the difference between the plan’s bid and the national average. In addition to consumer premiums, insurers collect a payment from CMS that varies across consumers depending on their health risk. CMS assigns consumer $i$ a risk score. To a plan that enrolls this consumer, CMS then pays a
subsidy equal to the insurer’s bid multiplied by \(i\)’s risk score net of consumer premium.\(^2\)

For consumers with income under 150 percent of the federal poverty line (known as “LIS,” or low-income-subsidy consumers), CMS pays the full premium when consumers are enrolled in a qualifying plan. Further, LIS consumers are randomly assigned to qualifying plans, unless they actively enroll in a plan of their choice. Plans in market \(m\) qualify for LIS random assignment and full subsidies if their consumer premiums fall below the average consumer premium in market \(m\). As discussed in detail in Decarolis (2015), LIS random assignment generates a discontinuity in market shares that we account for in Section 3.2.

Table 1 reports key summary statistics for the Part D market. In years 2007-2010, there were on average 1.3 million Medicare Part D eligible individuals per geographic market in the US. Out of these, about 0.2 million did not purchase any Part D coverage, about 0.25 million chose to buy drug plans bundled with Medicare Advantage, and 0.5 million enrolled in stand-alone prescription drug plans (PDPs).\(^3\)

Consumers had on average a choice of 49 Part D PDP plans in their markets, offered by 16 insurers in 2007-2010. We can clearly see the central role of subsidies in this market: the national average bid in years 2007-2010 was $1001, $648 of that amount was covered in subsidies. Consumers paid the remainder (plus any additional premiums that insurers can collect for coverage enhancements) for an average consumer-facing premium of $505. Consumer premiums varied substantially across geographic markets and time, ranging from $375 to $643 in annual premiums.

In our empirical analysis, we differentiate consumers by their health risk type. The idea is that consumers of different health may have different preferences for pharmaceutical coverage and also generate different costs for insurers. We distinguish six consumer risk types. Among consumers not eligible for low income support, we construct five risk groups that differentiate across low risk (relatively healthy) and high risk (relatively unhealthy) consumers. We treat consumers that are eligible for low income support as a separate (sixth) risk group. In Panel D, we report the share of each consumer risk type among enrollees in our analytic sample. The shares of risk type 1 (lowest risk) to 5 (highest risk) consumers in the market are on average respectively: 5, 20, 39, 7, and 1 percent. The remainder 30 percent of potential consumers are individuals eligible for low income subsidies.

\(^2\)In addition to premium subsidies, CMS further provides additional payments for especially high risk consumers. We discuss more details in Appendix A.

\(^3\)Detailed Medicare Part D enrollment numbers are recorded in Table 14 of the annual Medicare and Medicaid Statistical Supplement published by CMS at www.cms.gov/Research-Statistics-Data-and-Systems/Research/MedicareMedicaidStatSupp/Overview.html
2.2 Data

We combine two primary sources of data. The first dataset contains detailed information about plan prices and characteristics for all Part D plans in all markets in years 2007 to 2010. The data also includes information on market-level aggregate enrollment in PDP, MA-PD as well as other types of Part D programs.\footnote{These data are publicly available from CMS. CMS tabulates the depository of the data sources at \url{www.cms.gov/Research-Statistics-Data-and-Systems/Research-Statistics-Data-and-Systems.html}.} The second dataset are administrative individual-level pharmaceutical claim records for years 2007-2010 for a 20 percent sample of Medicare beneficiaries.\footnote{Detailed description of data and data access is available in the online supplementary materials for this paper as well as at \url{www.resdac.org}.} These data contain individual-level information on consumer demographics, including chronic conditions, as well as Part D enrollment status, including plan choice and low-income subsidy eligibility. The enrollment data is linked to claim information that records each drug purchase for each consumer in the sample. The purchase records include information about the total cost of prescription as well as how this cost is split between consumer, insurer, and the government. From the 20 percent sample we construct our analytic sample by restricting the data to individuals living in 50 US states and not having special types of pharmaceutical insurance, such as, for example, employer-provided coverage. The restrictions (described in more detail in Appendix Section A) decrease the sample size from 38,628,624 individual-years (for 11,266,409 unique individuals) in the raw data to 23,957,330 individual-years (for 7,543,722 unique individuals) in our analytic sample.

3 Model

We propose an empirical model of demand and supply of insurance contracts in Medicare Part D that will help us evaluate the efficiency and allocative properties of the subsidization mechanism in this program. We start with a model of demand for insurance contracts that follows the approach of Berry (1994) and Berry, Levinsohn and Pakes (1995)\footnote{hereafter referred to as BLP} before turning to a model of supply that incorporates the many institutional features of this market.

3.1 Demand

We model consumers in 34 Part D markets in years 2007 to 2010 as choosing an insurance plan that maximizes their indirect utility as a function of both pecuniary and non-pecuniary
plan characteristics. We estimate demand separately for six different risk types of consumers. The underlying utility structure is assumed to be the same across all six consumer groups; for the LIS market we adjust plan characteristics to reflect the differences in premiums and cost-sharing that these consumers face.\footnote{One empirical challenge specific to the LIS market is that we cannot distinguish between LIS enrollees who are in LIS-eligible plans due to random assignment or by choice. We address this challenge by aggregating all plans eligible for LIS random assignment into one choice within the inside option. To do the aggregation we average the characteristics of these LIS-eligible plans. The idea is to interpret the option of not opting out of the random assignment plans as one distinct choice that LIS enrollees can make. The potential measurement error introduced by this aggregation is alleviated by the fact that plans eligible for LIS random assignment have many of the same key characteristics for the LIS population, such as zero premiums, zero deductibles, no gap in coverage, and otherwise reduced or eliminated cost-sharing.}

The utility for enrollee \(i\) of plan \(j\) in market \(m\) consists of a deterministic component and an idiosyncratic Type I Extreme Value-distributed random shock, \(\epsilon_{ijm}\):

\[
 u_{ijm} = -\alpha_i p_{jm} + \beta_i x_{jm} + \xi_{jm} + \epsilon_{ijm}, \tag{1}
\]

where \(p_{jm}\) is the plan’s enrollee-facing premium after subsidies. The observable characteristics, \(x_{jm}\), include the annual deductible, a flag for whether the plan has coverage in the donut hole, whether the plan has additional coverage beyond the statutory minimum (i.e. it is “enhanced”), and several generosity measures of drug formularies. We also include fixed effects for parent organizations that capture individuals’ preferences for brand names of large insurance companies and quality characteristics of plans, such as pharmacy networks. \(\xi_{jm}\) is a plan-specific fixed effect that captures unobserved plan quality. We also include the number of years the plan has been on the market as a reduced-form approach to capturing stickiness in consumer decision-making.\footnote{Additional details and a discussion of the vintage measure may be found in Section C of the Online Appendix.}

The utility of the outside option is normalized to zero. For all five risk types of regular consumers, the outside option constitutes buying a Medicare Advantage drug plan bundled with a medical plan or not buying any drug coverage. For LIS consumers that are randomly assigned to plans when first entering the program, we assume that the outside option constitutes switching to Medicare Advantage.\footnote{We do not include consumers eligible for other sources of Part D coverage into our model, assuming that their coverage options are always superior to the publicly available Part D contracts. This primarily includes consumers eligible for coverage through Veteran Affairs and employer sponsored plans.}

We model heterogeneity in preferences along two major dimensions. First, for five risk types of regular enrollees, unobserved consumer heterogeneity enters the model through random coefficients on the premium, coverage in the gap, and overall inside option. The
unobserved heterogeneity may capture differences in income, as well as individuals’ differences in risk conditional on risk type, and risk aversion. We choose a log-normal distribution for random coefficients on premiums; it is composed of a common component, \( \alpha \), and an individual-level random shock, \( \nu \sim \mathcal{N}(0, 1) \), which is scaled by \( \sigma_\alpha \):

\[
\ln \alpha_i = \alpha + \sigma_\alpha \nu_i. \tag{2}
\]

The parameters governing coverage in the gap, \( \beta_{gap} \) and \( \sigma_{gap} \), and the inside option, \( \beta_{inner} \) and \( \sigma_{inner} \), are specified analogously without the logarithmic transformation.

Second, we allow the entire vector of preference parameters to vary based on observable risk type (and LIS status) of the consumer. This approach allows for risk-based sorting of consumers in the market. We place non-LIS consumers into one of five groups on the basis of a one-dimensional risk score, which we construct from a normalized prediction of individual-level drug expenditures. We predict drug expenditures using a linear link between historical drug expenditures observed in the data and individual’s health status measured with indicators for the presence of more than 50 chronic conditions. We divide individuals into five risk groups using percentiles of the risk score distribution (5th, 25th, 50th, 75th, and 95th percentiles).\(^9\)

### 3.2 Supply

Modeling the supply side in Medicare Part D market presents a considerable challenge, as the decision-making of insurers is affected by a complex set of regulatory provisions. For brevity, we have relegated the intricate details of the construction of our profit function to Section D in the Online Appendix. The resulting profit function for a given firm \( f \) with a portfolio of PDP plans \( J_f \) in a given market is given by:

\[
\pi_f(b) = \sum_{j \in J_f} \left( \sum_{t=1}^{5} \left[ M_t^R s^R(b)(\theta_t^R b_j - \kappa_t^R c_j) \right] + M_L^L s^L(b)(\theta^L b_j - \kappa^L c_j) \right), \tag{3}
\]

where \( b \) is the vector of bids set by firms, \( M \) is market size, \( s \) is a vector of plan shares, and \( c \) is a vector of marginal costs; the subscripts \( j \) refers to each plan and \( t \) to each consumer risk type among 5 risk types of regular enrollees. The superscripts refer to regular enrollees (\( R \)) and LIS enrollees (\( LIS \)).

\(^9\)Section B in the Online Appendix outlines the details of the OLS prediction, risk score construction, and division into five risk groups.
Several key aspects of this profit function differ from a profit function in a standard product market. First, while firms are required to set one bid per plan, \( b_j \), both per-enrollee revenues and costs are indexed by risk type and LIS eligibility. For a consumer of risk type \( t \), a firm that bid \( b_j \) receives \( \theta_t b_j \), where \( \theta_t \) is a risk-adjustment factor based on the enrollees’ risk score. The risk adjustment system is calibrated so that an average enrollee has a risk score of 1, which implies that firms receive more than \( b_j \) for higher risk enrollees and less than \( b_j \) for lower risk enrollees.\(^{10}\) Further, the firms faces a different expected cost for each potential consumer, depending on the consumer’s health conditions, pharmaceutical needs, and insurance plan design. To model this aspect of the insurance market, we assume that marginal costs vary multiplicatively by consumer risk type, so that the insurer’s marginal costs are given by \( \kappa_t^R c_j \), where the scaling factors \( \kappa_t^R \) and \( \kappa^{\text{LIS}} \) measure differences in average costs across consumer types.\(^{11}\)

This profit function thus captures the key difference of insurance markets compared to regular product markets: an insurer’s marginal cost curve is a function of all prices in the market due to consumers of different risk types sorting across plans. The slope of the marginal cost curve can be negative (adverse selection) or positive (advantageous selection); our model does not impose a restriction on the direction of selection. Since insurers cannot directly price discriminate in this market, the pooling of risks leads to cross-subsidization across consumer types, with lower risk types subsidizing higher risk types.

Second, consumers face subsidized premiums; the premium formula for regular enrollees is:

\[
p_j^R = \max \left\{ 0, b_j - \bar{b} + \zeta \bar{b} \right\},
\]

where \( \bar{b} \) is the enrollment-weighted average bid across all Part D plans in the entire US—critically, this includes not just PDP plans but also MA-PD plans—and \( \zeta \) is the share of the average bid not covered by the baseline federal subsidy.\(^{12}\) The adjustment \( \zeta \) is set every year by CMS and is governed by fiscal considerations and the Part D statutes. For example, in 2010, this number was 0.36. Notably, this premium subsidy structure distorts both the absolute and relative prices of Part D plans.

Third, the share of LIS enrollees in plan \( j \) is complicated by that market segment’s random assignment mechanism: only plans with a consumer premium below the average premium in the region qualify for random assignment of LIS consumers; all other plans receive zero LIS

\(^{10}\)In the Online Appendix we discuss the institutional details of the risk adjustment system, as well as why it may imperfectly offset the variance in costs across risk types.

\(^{11}\)The construction of these scaling factors is discussed in more detail in Section D in the Online Appendix.

\(^{12}\)Given that \( \bar{b} \) is determined by over 1,500 plans, we assume that firms treat it as a fixed constant.
enrollees, unless these enrollees opt out of the random assignment and actively choose these plans. Section D in the Online Appendix outlines how we address the resulting non-linearity in the plan’s market share in the LIS market.

We use the profit equation above and the behavioral assumption that insurers in this market engage in Bertrand price competition to infer plan-type-specific marginal costs and to solve for market equilibria under counterfactual subsidy mechanisms.

3.3 Welfare Metrics

In most of our counterfactual exercises, we will focus on measuring welfare levels and changes for regular enrollees. For these enrollees, total welfare in the Medicare Part D PDP market is comprised of three pieces: consumer surplus ($CS$), insurer profits ($\Pi$), and government subsidies ($G$) including the deadweight loss associated with taxation needed to fund the subsidy payment:

$$W = CS + \Pi - \lambda G,$$

where $\lambda$ is the social cost of raising public revenues. All objects in Equation 5 account for opportunity cost: consumer surplus is measured against the zero-utility outside option, profits are computed against what the firm could have made selling to consumers in another market, for example, MA-PD; and government expenditures reflect the opportunity cost of subsidizing the consumer in another market, such as MA-PD or other public pharmaceutical programs. When solving for a vector of prices that would lead to a socially optimal allocation, we adjust the welfare function by multiplying $\Pi$ by $\lambda$. This captures the idea that under a social planner’s allocation, the government directly controls prices and will tax/subsidize firms to achieve a zero profit condition. Detailed derivations of each component of the welfare function can be found in Section E of the Online Appendix.

4 Model Estimates

4.1 Demand Parameters

Table 2 reports demand estimates. Columns (1)-(5) report estimates for regular enrollees from the random coefficient logit model with a log-normally distributed price coefficient; column (6) reports demand estimates from a Berry (1994) logit model for LIS enrollees.\textsuperscript{13} All

\textsuperscript{13}We do not estimate random coefficients for the LIS enrollees as the relevant product characteristics are set to zero for this population.
models are estimated using instrumental variables to account for the possibility that there is unobserved quality aspect of plans in the error term that is correlated with premiums, but that we fail to capture with the observed characteristics. We instrument for plan premiums and assume that other characteristics of the contracts are exogenous in the short run. We motivate this by observing that, while bids for a given plan vary substantially over time, insurers offer a rather stable portfolio of contract types over time (Polyakova, 2016). We use BLP-style instruments that measure the number of insurance contracts offered by the same insurer in a different market, as well as Hausman-style instruments that measure prices charged for the similar plans in other geographic markets. These instruments are particularly appealing in our setting due to the regulatory structure of the market, where markets are separated by CMS. Instrumenting the price in one region with the prices of the same contract in other regions allows us to isolate the variation in prices that is common across these contract (e.g. due to insurer’s price negotiations with pharmaceutical producers), but is not correlated with market-specific unobserved quality (e.g. due to local marketing) over and above average quality captured by insurer fixed effects. The first stage is jointly statistically significant with an F-statistic of 245 for the market with regular consumers and 23 for the LIS market.

We find intuitive patterns for the price coefficients, with riskier types and LIS consumers having generally lower price sensitivity than other consumers. We do not find evidence of statistically-significant dispersion in the price coefficient, which is reasonable given that we are estimating demand within groups of consumers with similar expected costs and health risks, both likely drivers of price sensitivity. Modal aggregate elasticities of demand by consumer risk group are -12.9, -8.9, -5.5, -5.26, and -5.9, in the order of increasing health risk. These are economically reasonable estimates and are similar to the range of (aggregated across risk types) elasticities reported in Lucarelli et al. (2012) (-2.0 to -6.0) and Starc and Town (2015) (-5.0 to -6.3).

Non-premium plan characteristics are estimated to have coefficients with intuitive signs. Consumers dislike higher plan deductibles—more so if they have lower health risk—but enjoy measures of plan generosity: coverage in the gap, broader coverage of common drugs, and more in-network pharmacies all give higher utility. We also note an economically- and statistically-significant positive coefficient on the vintage of plans, suggesting that plans that entered earlier in the program were able to capture a larger beneficiary pool. We find

\[14\] Specifically, we construct the instrument by including the lagged enrollment-weighted average of prices of plans offered in other regions in the same macro region and in the other macro-regions by the same company, where macro-regions are defined as three large geographic areas in the US.
some evidence of significant dispersion in preferences (among some risk types) for two other variables for which we allow random coefficients: the inner option and the dummy for gap coverage.

To assess whether the estimated willingness to pay is reasonable consider the following calculation. A typical plan with a non-zero deductible has a deductible that varies from $265 to $310 dollars. At the average of $290, removing the deductible has a dollar value of $290 \cdot (-10.6/23.5) = $130 at the median value of the premium coefficient for risk group 1. For risk group 5, the same computation suggests that this group values removing the deductible at $290 \cdot (-7.92/12.9) = $178. These levels of willingness to pay for zero deductible seem reasonable. Noting that consumers still on average pay Medicare’s standard 25 percent co-insurance for the first $290 in spending, the expected monetized value of going from $290 to zero deductible is $0.8 \cdot ($290 - 0.25 \cdot $290) = $174, which is almost exactly our willingness to pay estimate for consumers who are likely to spend through the deductible (i.e. those in risk group 5) and it is lower for consumers who are less like to spend the whole amount (the deductible level lies roughly at the 20th percentile of the spending distribution - see Einav et al., 2016).15

Column (6) reports 2SLS estimates of the Berry logit model for the LIS market. To estimate LIS demand, we adjust premiums to reflect LIS-specific subsidies and remove cost-sharing rules such as a deductible that LIS consumers do not face. The estimated price coefficient at -7.9 suggests that LIS demand is less sensitive to prices than all risk types of regular enrollees. This is intuitive, as prices are about $400 lower per year for the LIS enrollees when compared to regular premiums.

4.2 Marginal Cost Estimates

We address two challenges in constructing the marginal cost estimates. First, plans that are eligible and compete for random assignment of low-income subsidy beneficiaries have

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15 A similar calculation for coverage in the gap gives a valuation of $1000 \cdot 4.62/12.9 = $358 for risk group 5 and $1000 \cdot 3.83/23.5 = $163. Again, this is reasonable given that consumers are not very likely to enter the gap. Further, even if offered, gap coverage will not cover 100 percent of expenditures, making the actual difference between having and not having coverage for the $3000 gap roughly 75 percent of the gap’s amount. That is, if individuals spent through the whole gap, they would value the coverage at $2,250. Assuming that consumers that enter the gap have uniform expenses across the gap, the mean gain in coverage is $1,125. However, most consumers do not face these costs in the gap; Einav et al. (2016) document about 25 percent of consumers enter the gap. Assuming those consumers entering the gap have uniformly distributed expenditures in the gap, the upper bound on the valuation of coverage is $281. We estimate a value that is substantially above this amount for the riskiest consumers and substantially below for the lowest risk consumers.
a non-linear share function preventing us from using a standard approach of inverting the first order condition for these “distorted” plans. Second, marginal costs are assumed to not be constant within a plan across enrollees—we allow for marginal costs to vary across five regular consumer risk types and LIS consumers.

We start with the estimation of marginal costs for plans that we identify as systematically not competing for random assignment of LIS consumers.16 This set of plans includes 756 out of 1,540 plans available in 2010, which is the year that our counterfactual analysis will focus on. For these plans, we assume that the pricing incentives are captured by the first order condition of the profit function in Equation 3 with respect to bid $b$. The first order condition for prices can be inverted to recover the baseline marginal cost $c_j$ for each plan $j$ (Nevo, 2001). Normalizing the marginal cost multipliers $\kappa_R^t$ (which we estimate from claims data as described in Appendix D) so that the multiplier for risk group 1 of regular enrollees, $\kappa_R^1$, is equal to one, the inversion recovers the marginal cost for the least expensive risk group 1 enrollees. We then apply $\kappa_R^t$ multipliers for risk groups 2-5 as well as the LIS consumers to compute marginal costs for all enrollees.17

We next proceed to estimating the marginal costs for plans that we hypothesize distort their bids to compete for LIS random assignment, since we observe these plans’ insurer-market pair qualifying for random assignment at least once in our data. We use a hedonic regression of marginal costs on plan characteristics of “non-distorted” plans and then apply this projection to the distorted plans to get a prediction of marginal costs. The hedonic regression for 756 non-manipulating plans takes the following form (we estimate a separate regression for each consumer risk type $t$):

$$mc_{jt} = X_{jt} \beta_t + \tau_{ft} + \delta_{mt} + \epsilon_{jt}, \quad (6)$$

where $X_{jt}$ includes the same non-premium characteristics of plans that we had included in the utility function. We add the unobserved quality estimate for each plan as an additional explanatory variable in $X$. We condition the regression on firm ($\tau_{ft}$) and market ($\delta_{mt}$) fixed

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16We construct a group of such plans by selecting all contracts of those insurers that within a given market (year-region) were not eligible to enroll randomly assigned LIS individuals into any of their plans. See Decarolis (2015) for a discussion of factors that are likely to drive plans to compete for low income beneficiaries.

17As the multipliers do not vary by plan, we assume that on average consumer-type spending does not change across plans, i.e. assume no moral hazard. While the literature has documented the presence of some moral hazard in this market (Einav et al., 2015), the (relatively small) estimated magnitudes are concentrated in the coverage in the gap benefit phase, which only few enrollees reach - hence, we would not expect them to affect the average across a large number of enrollees within enrollee types.
effects to account for inherent differences in marginal costs across insurers and geographic regions. Panel B of Table 2 reports the coefficients for the hedonic regression. Intuitively, the most important determinants of marginal costs are estimated to be deductibles (a higher deductible is associated with a lower marginal cost) and coverage in the gap (plans that offer coverage in the gap have higher marginal costs). We use the estimates of how plan characteristics translate into marginal costs to predict marginal costs for all plans that we assume are “distorted” by LIS random assignment. This exercise hinges on the assumption that all plans have a similar “production function.” In other words, we assume that the plans that manipulate the LIS threshold manipulate theirs bids, but do not have different marginal costs conditional on a set of non-price characteristics. This appears reasonable, as the main source of costs in the insurance market is determined by individual health risk; therefore, it is conceivable to assume that plans with the same financial characteristics and formulary generosity will have similar marginal costs conditional on the same risk pool.

The resulting vector of marginal costs is centered at $663 for the lowest risk enrollees and ranges from $337 to $1,193 across plans. The scaling for highest risk regular enrollees of type 5 implies an average marginal cost for this risk group of $1,800 with a range across plans from $809 to $3,220. These estimates of economic marginal costs from the inversion of the first order conditions appear plausible given our estimates of plans’ accounting costs from the claims data. Our computations suggest that the average PDP plan liability was $588 for regular consumers of risk type 1; $1,067 for average risk category 3; $1,977 for risk category 5, and $1,363 for LIS beneficiaries. Our estimates of economic marginal costs imply profit margins of 7 percent on average (standard deviation of 9 percent) for regular enrollees. These are fairly low margins, suggesting that the regular enrollee market is reasonably competitive, which is consistent with the policy analysis of this market (Congressional Budget Office, 2014).

4.3 Measuring Government Spending

In the remainder of the paper, we repeatedly calculate welfare that requires several assumptions about the computation of government spending. There are two types of government expenditures that we compute. First, we compute premium subsidies. The baseline premium subsidy is set at circa 70 percent (with some minor annual variation) of the average

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18We define plan liability from the claims data as follows: for each individual we take the difference between the total cost paid for drugs at the point of sale, subtract patient cost-sharing payments, LIS cost-sharing subsidies, and 85 percent of spending in the catastrophic part of the benefit, as the plan carries only 15 percent liability in the latter benefit phase.
(weighted) bid for basic coverage across all plans offered in the US in a given year. The consumer premium is computed as the difference between plan’s bid together with plan’s add-on prices for any coverage enhancements and the baseline subsidy. The baseline subsidy is not actually paid out to the plans. Instead plans receive a payment that is the difference between their baseline bid multiplied by the enrollee’s risk score, and consumer premium. As the risk score can be smaller than 1 for relatively healthy enrollees, plans receive subsidy payments that are much lower than 70 percent of the average (weighted) bid for less risky enrollees, while receiving much higher subsidies for higher risk enrollees. As detailed above and in the Appendix Section B, we construct proxies for risk scores from the information about chronic conditions and use the average risk score per consumer type to scale subsidies received by plans.

The second type of government payment to Part D plans is reinsurance. This payment covers 80 percent of prescription costs for very high spending beneficiaries. In 2010, beneficiaries had to spend more than $6,440 in total on drugs for the re-insurance program to start paying out to plans. We compute average differences in reinsurance payments per risk type (most of the payments are concentrated in risk group 5) from observed claims data. We assume that this payment multiplier is fixed and does not change across counterfactuals. We apply these multipliers to plan-level reinsurance statistics reported by CMS.\footnote{Reported in \url{www.cms.gov/Medicare/Medicare-Advantage/Plan-Payment/Plan-Payment-Data.html}.} We further compute average premium and reinsurance subsidies in the MA-PD program, as well as additional payments for low income beneficiaries from the micro-level claims data. The MA-PD computation allows us to estimate the opportunity cost of government expenditures in the PDP program. In our data, most individuals that switch out of PDP plans switch to MA-PD rather than to no coverage. Hence, in our counterfactuals, we assume that if individuals switch from the inside option of PDP plans to the outside option, they switch to the MA-PD program rather than leave drug insurance altogether. Thus, the government is still likely to incur subsidy spending for these individuals through the MA-PD program. The details of these calculations are outlined in Appendix Section E.

4.4 Efficiency of the Observed Subsidy Mechanism

Using demand and marginal cost estimates, we next compute consumer surplus, producer profits, government transfers, and total surplus for the observed market allocation and the observed subsidy mechanism. For expositional clarity, we report results for a single year (2010). The calculations are reported in the first and second columns of Table 3 for regular
and LIS enrollees, respectively.

We estimate that total annual consumer surplus generated by Part D PDP for regular enrollees was $2.4 billion (row 1), or about $300 for each of 7.8 million enrollees (36 percent of potential market size). The majority of enrollees, 59 percent, were of about average risk, in risk group 3. 6 percent were in the healthiest category and only about 1 percent of enrollees fell into risk type 5. All enrollees paid on average $510 in premiums, while firms collected $1,129 in per capita revenue prior to risk adjustment. Accounting for risk adjustments, but not counting any ex post risk corridor payments, we compute that insurer profits amount to $536 million (row 2). The $3 billion of consumer and producer surplus came at a steep price—government expenditures on PDP subsidies (including premium subsidy, risk adjustment payments, and reinsurance) totaled nearly $5.5 billion (row 7). Taken at face value, the program thus generated negative surplus with a return of -46 cents on a dollar spent in subsidies (row 13).

To interpret this computation, however, it is important to take into account the opportunity cost of government funds. The outside option in our model includes either purchasing an MA-PD plan or not purchasing any creditable Part D coverage. If all consumers that were to leave PDP plans enrolled in MA-PD plans, the government would incur a very similar level of expenditures on these consumers. In rows (8)-(10) we compute that the government would have spent $5.9 billion if PDP consumers enrolled in MA-PD.20 The difference between row (7) and (10) that amounts to $450 million, is the extra government spending on pharmaceutical coverage generated by the PDP program. This extra spending along with our assumption that the deadweight loss of government taxation is 30 cents on the dollar, gives us the social cost of government spending on PDP plans of $585 million.21

Putting it all together, we estimate the total surplus generated by the regular Part D PDP market when accounting for the opportunity cost of government funds was about $3.5 billion. In other words, the government generates extra 65 cents of surplus for each dollar it spends in the PDP program. This positive return on a dollar is one of our primary findings, along with the corollary that the vast majority of this surplus comes from foregone

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20 This estimate of alternative government spending only includes the subsidies for pharmaceutical coverage in MA-PD. The literature on Medicare Advantage has further estimated that there are differences in per capita public spending on medical insurance between enrollees in traditional fee-for-service Medicare versus Medicare Advantage. We do not take into account this difference, as we do not have the data to compute risk-type specific differences between traditional Medicare and Medicare Advantage. Since the literature estimates that Medicare Advantage leads to higher government spending (Curto et al., 2015, estimate that the difference was about 3% in 2010 and 11% on average in years 2006 to 2010), our computation is a lower bound of surplus in the PDP program.

21 We examine the sensitivity of our results to the value of \( \lambda \) in Appendix E.
government expenditures. The latter generalizes to many publicly funding settings, where
the return on public spending in each program is hard to evaluate in vacuum, as there are
almost always substitute programs where the government still incurs expenditures on the
same individuals. Without taking into account “competing” programs and the opportunity
cost of government funds, one may significantly underestimate the surplus generated by each
publicly-funded program.

Column (2) of Table 3 reports a similar calculation for the LIS market. Consumers in
this market enjoyed $2.6 billion in surplus. We do not report the profits associated with this
part of the market, as the the static Bertrand-Nash model of competition used to recover
marginal costs in the regular market does not apply to firms engaged in dynamic competition
for LIS enrollees. Computing government subsidies and government opportunity cost for
LIS enrollees requires some additional accounting to incorporate LIS-specific payments to
insurers that cover the generous reductions in cost-sharing that LIS beneficiaries enjoy. We
add LIS premium subsidies to the row that counts government premium subsidies in PDP.
For the non-premium subsidies, we add the per-plan average payments for LIS cost-sharing
that we compute from the claims data. These generate significant quantitative changes to
subsidy levels as compared to regular beneficiaries—we compute the per capita government
spending on LIS enrollees in 2010 to be $5,287 as compared to $698 for regular enrollees.
We do similar accounting adjustments on the MA-PD side, so as to make the opportunity
cost calculation comparable to the calculation of PDP subsidies. After these adjustments
and under insurer profits set to zero, total welfare is computed at negative $6.1 billion. This
is driven by two factors. First, LIS beneficiaries face much lower prices—on average $485
lower annual premiums than regular enrollees - this difference is paid from public funds.
Second, given our computation on the level of subsidization of LIS enrollees in both PDP
and MA-PD programs, MA-PD appears modestly less expensive. Hence, the net government
spending component of the welfare function for LIS enrollees is negative. The bottom line is
that the government spends an enormous amount of money on LIS enrollees in PDP, where
willingness-to-pay is low and the opportunity cost of government spending is negative.

5 Counterfactual Subsidy Mechanisms

We are interested in understanding how insurer incentives and consumer demand interact
with the subsidy mechanism to determine market outcomes. We initially consider a set of
counterfactual subsidization mechanisms where the outside option (MA-PD plans) is held
constant while we adjust the subsidy mechanism in the PDP market. This conceptual exercise allows us to cleanly illustrate and tease apart the complex economic forces at work. We then turn to a set of counterfactuals where we adjust the outside option to reflect equilibrium changes in the PDP market. The idea is that any changes to subsidies in the PDP market are likely to be mirrored in the MA-PD market—the counterfactuals with adjusted outside option allow us to simulate such parallel changes.

In both settings, we consider two distinct types of subsidy mechanisms. The observed mechanism sets subsidies as a function of the bids submitted by insurers. With a sufficiently competitive product market, the appeal of this approach is that subsidies are linked to the costs of providing the good. This has the advantage of protecting consumers from the risk of cost increases as well as giving policy makers a practical starting point for determining subsidy levels. The downside of such approach is that strategic firms can internalize the fact that the subsidy is more generous when bids are higher, leading to higher profits at the expense of taxpayers. To evaluate this approach to subsidy determination, we consider several local alterations of the existing mechanism. We start by investigating the equilibrium effects of cross-market ties—under the observed mechanism the subsidy in the PDP market depends on insurer bids in MA-PD and LIS markets; we remove these ties in our counterfactual simulations. We then investigate the role of market power for such bid-based subsidy determination by simulating the allocations under the two extremes where every plan is a firm and where all plans are owned by one firm. Lastly, we consider what happens if bid-based proportional subsidies are tied directly to firm bids rather than to a weighted average of such bids as in the observed mechanism.

We then proceed to consider an entirely different type of subsidy—a flat voucher that is not linked to any contemporaneous insurer behavior. Conceptually, this type of subsidy can generate high-powered incentives to lower prices when markets are sufficiently competitive. At the same time, it imposes a greater informational requirement on the government to arrive at a subsidy level and places the incidence of program cost risks onto consumers. Multiple proposals for reforms in Medicare and other publicly subsidized programs envision flat subsidies; hence, evaluating the benefits and drawbacks of such high powered mechanisms is particularly relevant for understanding the proposed policy-making in and outside of Medicare.

Our intent across all counterfactuals is to both understand the specific welfare consequences of different mechanisms in PDP, which is of independent interest given its popularity and the large amount of government expenditures flowing through it, but also to draw out
more general lessons about why different mechanisms generated more or less surplus that may be useful in guiding subsidy mechanism design in more general contexts.

5.1 Results with Outside Option Held Fixed

Table 3 shows the results when the outside option is held fixed. We start with two counterfactuals that remove cross-market links across PDP, MA-PD, and LIS markets in columns (3) and (4). Removing LIS market incentives from the regular market leads to an increase in bids and the generosity of the subsidy relative to the observed allocation. In this counterfactual, the firms have no incentive to compete to be below the average premium in order to be eligible for randomly-assigned LIS enrollees. The resulting PDP enrollment of regular enrollees is higher than under the observed allocation, as is the government spending on both premium and reinsurance subsidies (by $1,743M). Total surplus that accounts for the opportunity cost of government funds increases ($230M) despite the fact that additional government spending exceeds the increase in consumer surplus ($380M) and producer profit ($503M); the positive difference in total surplus is driven entirely by the slower change in the foregone government spending in the MA-PD program ($1,241M). Rows (18)-(22) highlight the role of risk selection in the market. Higher subsidies lead to a very slight increase in the share of enrollment from lower risk consumers; the direction of this effect is intuitive and the small magnitude of changes are consistent with the previous literature that has found limited risk screening on prices in this market (Polyakova, 2016). Column (4) reports the outcomes when the average bid in the formula for determining the subsidy in the regular market no longer includes MA-PD plans (which tend to have lower bids than PDP plans). In this case, the baseline subsidy is set as 68 percent of the average Part D PDP bid. Given higher PDP bids, this change leads to another increase in the subsidy relative to column (3). As a result, consumer surplus and profits increase again; this increase, however, is offset by the growth in opportunity-cost-adjusted government spending, which leads to a slightly lower total surplus. The results in column (4) give us a benchmark (simulated within the model) for the analysis of alternative subsidy mechanisms for the regular market.

These results illustrate several general economic forces at play in this market. First, with a highly-subsidized substitute available (i.e. switching to MA-PD plans that offer both medical and pharmaceutical coverage), consumers’ baseline willingness-to-pay for plans in the PDP market is very low. Column (10) reports results when the premium subsidy is set to zero; PDP enrollment drops to near zero as consumers leave the PDP market.\textsuperscript{22}

\textsuperscript{22}The idea of low willingness to pay for health insurance coverage in the presence of even more distant
Second, increasing the generosity of the subsidy bolsters total consumer welfare, but does so by giving costly transfers to inframarginal consumers (and changing relative prices within the PDP market, which can lead to further allocative distortions) while also attracting marginal consumers with decreasing valuations for the product. This is reflected in consumer surplus per enrollee: under the observed mechanism it is $441, without LIS enrollees this number drops to $377, and without links to the MA-PD market it declines further to $322.

Third, the sign of welfare outcomes is largely driven by the opportunity cost of government spending. Government expenditures in PDP per enrollee increase from $698 under the observed allocation to $738 and $760 across the two counterfactuals. Even with producer profits included, these costs substantially exceed the benefits that they generate within the PDP market. It is only when the opportunity cost of spending in the MA-PD market is accounted for, does the overall welfare of the PDP market become positive.

Fourth, the government’s difficult balancing act on the consumer side of the market—setting premium subsidies to induce the optimal level of sorting across the inside and outside options and across plans within the inside option—is further complicated by possible strategic behavior by insurers. To help assess the degree of market power and strategic markups in this market, Columns (5) and (6) report results for two extreme counterfactuals on the supply side: one where all plans are independent firms, and one where all plans are owned by a single monopolist. In both cases we let the subsidy rule follow the same mechanism as in column (4). There is a substantial degree of market power possible in this market: the average enrollment-weighted bid under the monopolist is over $79 higher than with atomistic firms, an increase of just under 7 percent. This leads to higher profits and lower consumer surplus. Interestingly, total welfare is nominally lower under both the atomistic firms counterfactual and under a monopolist than in the reference column (4). Atomistic plans attract slightly too many consumers to the market, given how much it costs the government to service them, while the monopolist has too few.

The results suggest that, without links to the LIS market and MA-PD, the current ownership configuration delivers outcomes fairly close to that of a purely competitive ownership structure. This is an interesting result, as one of the motivating reasons for using managed competition to deliver publicly-subsidized goods and services was to leverage competition to reduce prices. Our conclusion on this point requires caution, however, as we cannot assess the counterfactual of possible alternatives, such as a standard government-run program or a substitutes—such as charity care—has been documented in other settings. For example, Finkelstein et al. (2017) find low willingness to pay for health insurance among low income adults in Massachusetts.
regulated monopolist, as we do not know anything about the comparative costs of delivering similar insurance plans in such scenarios, and therefore we cannot make any claims about additional efficiencies introduced by competition. Also, while we take the marginal costs of firms as given here, it is possible that a single buyer would be able to exert monopsony power in negotiating with upstream pharmaceutical companies. The combination of the two effects is ambiguous, and we limit our conclusion to the observation that the current ownership structure gives results similar to that if all plans were independent firms.

Fifth, subsidy design matters. We have already shown that linking the level of the subsidy to other markets can have large effects on market outcomes, and we now show that how insurer bids are translated to consumer premiums can have an even more dramatic effect. We solve equilibrium outcomes under two different approaches: a proportional subsidy and a flat subsidy (i.e. a voucher). Columns (7)-(9) show the outcomes for proportional subsidies where consumers pay 5 percent, 32 percent, or 95 percent of the bid submitted by insurers. This subsidy mechanism produces extreme outcomes, primarily due to the exercise of market power by insurers. In the two cases where consumer are largely shielded from bids, insurers increase bids dramatically. The government is left to cover the large gap between the bid and the consumer-facing premium. In the case where consumers pay 5 percent of the bid, enrollment is nearly universal and government expenditures are nearly a staggering $3,200 per enrollee. Of the increase of $55 billion in government expenditures, firms capture $34 billion, or 62 percent. Only when the consumers pay 95 percent of the bid does the mechanism produce positive welfare numbers, although far below the current mechanism. Notably, the extreme counterfactuals where consumers face almost the full cost of coverage—those in columns (9) and (10)—are the only ones that result in positive nominal surplus without accounting for the opportunity cost of government spending. In these counterfactuals, the government spends far less than it generates in consumer and producer valuation, as only consumers with the highest willingness to pay stay in the program.

Inspecting the formula for determining the consumer-facing premium subsidy in Equation 4 reveals that the existing mechanism is similar to a lump-sum voucher from a consumer’s perspective; there is essentially a fixed payment that is applied to each plan in the marketplace. To assess this intuition empirically, we solve for outcomes with vouchers running from $0 to $1500 in $100 increments. Columns (10)-(12) show the outcomes of vouchers with the extremes of $0 and $1500 along with the voucher that generated the highest amount of surplus ($800). Figure 1 illustrates our estimates of total welfare across the range of vouchers.
considered.\textsuperscript{23} Total surplus under the fixed outside option (marked with solid black line) is positive until $1,300, peaking at $800 at a level of welfare that is slightly higher, although comparable, to the existing mechanism. In general, vouchers perform much better than proportional subsidies, largely because they preserve the elasticity of demand on the margin while still allowing the policymaker to influence sorting between PDP and MA-PD. In turn, this leads firms to keep their bids reasonably competitive, minimizing the amount of costly transfers from taxpayers to firms. This is exemplified by the average weighted bid actually being lower at the $800 voucher than at the extremes. We note that the most generous proportional and voucher counterfactuals have very similar enrollments, but are achieved at vastly different levels of social cost—proportional subsidies lead to average bids of nearly $4,000 and create an order of magnitude higher social loss.

To put our normative findings into perspective, we perform three benchmark computations of the social optimum in this market. We start by computing the social planner’s allocation. We assume that the social planner knows consumer demands and marginal costs (both by type) and can directly set prices, but cannot force consumers to purchase certain insurance plans but must incentivize their choices through plan prices. The detailed results are reported in column (1) of Table 4, while Figure 1 shows the level of welfare achieved by the social planner in comparison to market mechanisms. We find the social planner’s solution by solving for a set of plan-specific prices in Equation 5. The social planner increases welfare to $5.4 billion and sets prices that result in large losses for insurers. To illustrate, Figure 2 plots the resulting changes in premiums compared to the observed mechanism, along with changes in market shares by the highest and lowest risk types, in the California market. Plans are ordered from left to right by increasing marginal cost. There are two broad takeaways: first, the social planner adjusts prices to obtain a general shift in market shares to favor less-costly plans. The majority of plans losing market share are the most expensive, while the single biggest increase in share occurs at a low-priced plan. The second takeaway is that there are substantial differences in where consumers of different risk types move, with the largest difference being that the social planner puts more of the most expensive consumers into cheaper plans. The social planner’s solution illustrates that consumers are systematically choosing plans that are too socially expensive and are doing so differentially

\textsuperscript{23}We note that our model allows for “soft” exit of plans under very low subsidies. We constrain insurers to make weakly positive profits: when subsidies are very low, as in the case of a $0 voucher, insurers may find it profitable to set very high premiums for some of their plans to induce zero enrollment. This is akin to plans exiting the market in an environment where fixed costs accrue primarily at the insurer rather than at the individual plan level.
by risk type which leads to inefficient sorting.

Figure 1: Welfare under Counterfactual Subsidy Policies

Figure reports estimated total welfare (including the accounting for the the opportunity cost of government spending) in counterfactuals with flat voucher subsidies ranging from $0 to $1,500, in $100 increments. Solid black line marks the welfare estimates in counterfactuals with fixed outside option (row 11 in columns 10-12 in Table 3. Thick grey dashed line plots welfare levels for counterfactuals with vouchers when the subsidy in the outside option (MA-PD) is adjusted to be the same voucher (row 12 in Columns 5-7 of Table 5). We also mark total surplus (at the average subsidy level) for the observed allocation, the public option with subsidy counterfactual, as well as the social planner’s surplus level (column 1 row 11 of Table 3; column 2 row 12 of Table 4; and column 1 row 2 of Table 4, respectively).

We also consider an alternative scenario that captures some of the intuition of the social planner while retaining simplicity. In a counterfactual that simulates the idea of a very generous public option (which can be thought of as, for example, letting Medicaid administer pharmaceutical coverage), we replace all plans in each market with the characteristics of the
plan with the lowest estimated marginal cost.\textsuperscript{24} We assign the reinsurance subsidies that
the government pays under the existing mechanism to the marginal cost of that plan. The
government then pays the same average premium subsidy as under the observed allocation
($676) while setting prices such that the firm makes zero profit. The results are reported in
Column (2) of Table 4. In this simulation of public option coverage, we find that overall sur-
plus is lower than that under the social planner at $3.2 billion. Consumer surplus, however, is
almost as high as under the social planner at $3 billion, while producer profit is set to zero by
design. This counterfactual manages to achieve a close-to-optimal sorting of consumers be-
tween MA-PD and PDP; the total surplus it generates is comparable to the levels of surplus
under the optimal voucher and the observed mechanism. This counterfactual is particularly
appealing given its simplicity in theory; in practice, it of course depends on the ability of
the government to offer a public plan at the cost of the cheapest private plan observed
in this competitive environment. One way in which this kind of semi-public option could arise
would be through an auction mechanism, where only one—most efficient—private plan is
allowed to serve a geographic market for a given year. The results in column (3) emphasize
that the surplus in this environment is still generated by the opportunity cost of government
funds, as consumers do not have sufficient willingness to pay even for the least costly plans.
In column (3), we simulate a related counterfactual where the government offers a low cost
public option that is, however, not subsidized. This would be closer to traditional Medicare
(rather than Medicaid) expanding pharmaceutical coverage and charging the cost of coverage
to consumers. In this case, we see similar patterns as in competitive counterfactuals with no
subsidies—enrollment drops almost to zero and only consumers with high enough valuation
of coverage enroll in the program, generating positive nominal surplus.

We find that most of the mechanisms are very similar in the composition of risk types
for enrollees in the inside option. To the extent that risk sorting changes in more extreme
counterfactuals, it follows intuitive patterns consistent with the presence of adverse selection
in this market. Figure 3 illustrates how the share of high risk consumers (type 4 and 5)
changes in the inside option as voucher-based subsidies get more generous. As vouchers
increase, leading to lower prices, the share of high risk consumers falls as lower risk consumers
start entering the market. This gradient is relatively shallow at very high subsidy levels,

\textsuperscript{24}We keep the number of plans fixed to equalize the role of the idiosyncratic error term in the logit model
when comparing outcomes across counterfactuals. For some lowest cost plans we do not observe positive
enrollment for all risk types, which leads to a missing estimate of the plan-risk-type-specific fixed effect $\xi$.
The proceed with the public option counterfactuals we had to impute the missing $\xi$ estimates. We proceeded
by taking $\xi$ estimates for a given plan for other risk groups and scaling is by the ratio of average differences
in $\xi$’s across risk types among all plans for which we were able to estimate $\xi$’s.
Figure 2: Social Planner’s Solution: Changes in Premiums and Market Shares

Figure illustrates an example of the social planner’s allocation in one Part D market - California in 2010. The x-axis orders 47 PDP plans that were available in California in 2010 by increasing - from left to right - estimated marginal cost. On the left-hand-side y-axis we then plot the change in the market share of each plan that the social planner induces relative to the observed allocation. The changes are plotted with vertical bars. Positive changes imply that the social planner allocates a plan a higher market share, while negative bar values imply a lower market share for the plan, relative to the plan’s observed market share. We report the changes in market shares separately for lowest risk regular consumers (risk group 1) and highest risk regular consumers (risk group 5). The right-hand-side y axis and the corresponding dashed line plots the changes in premiums for each plan between the premium set by the social planner relative to the observed premium. A positive value of the premium difference for a plan implies that the social planner’s solution would increase the premium for this plan.

suggesting that after a certain threshold, prices are not the first-order drivers of selection. For example, moving from $800 voucher in column (11) to $1,500 voucher in column (12) leads to a dramatic change in prices from $444 to $78—this is associated with the share of
inside option enrollment from risk groups 1 and 2 only increasing from 25 to 30 percent, and high risk consumer share decreasing from 15 to 10 percent. Notably, Figure 3 highlights that the optimal voucher of $800 achieves the same share of high risk consumers among inside option enrollment as under the social planner. This optimal share of high risk consumers is about 5 percentage point lower than the observed share, suggesting that too few of low risk consumers are purchasing PDP insurance (a common result in markets with adverse selection).

With the usual caution that our findings are specific to our settings, there are several general themes that can be distilled from our results that may apply to other instances of regulated and subsidized competition. We find that the best mechanisms share three qualities: they preserve the marginal relationship between the prices that the firm sets and the prices that consumers face, they limit how fast the subsidy grows as a function of firm prices, and they link the consumer-facing price to (social) marginal cost. Keeping consumer-facing prices related one-to-one to firm’s prices at the margin increases the elasticity of demand and leads to lower prices in equilibrium. Slowing down how fast the subsidy grows relative to the prices that firms set also helps limit firms from exerting market power to increase prices. Finally, as illustrated by the social planner’s solution, keeping consumer prices related to marginal cost prevents allocative inefficiency along both the extensive and intensive margins.

The existing Part D mechanism reflects these three qualities in several dimensions. First, linking the equilibrium subsidy with both the LIS and MA-PD markets helps keep the subsidy low. Second, the form of the subsidy, as a percentage of enrollment-weighted average of last year’s plans average bid, both limits strategic pricing by insurers and preserves the marginal relationship between bids and consumer prices by acting like a voucher. Third, the size of the subsidy is not so large that all consumer-facing premiums are zero, which in turn helps preserve the link between marginal cost and prices.

5.2 Results with Adjusted Outside Option

We next examine how the results of the main counterfactual simulations change when the outside option (i.e. MA-PD) is adjusted to reflect changes in the generosity of subsidies in Part D PDP. For each counterfactual, we adjust the subsidy in the outside option by the average value of the change in PDP subsidy. Importantly, this remains a partial equilibrium analysis, as we do not consider possible general equilibrium changes in MA-PD prices, in
Figure 3: Risk Sorting under Counterfactual Subsidy Policies

Figure reports the share of high risk consumers (risk type 4 and 5) among regular consumers that are buying the inside option - a PDP plan - in counterfactuals with flat voucher subsidies ranging from $0 to $1,500, in $100 increments. Solid grey line marks the share of high risk consumers in counterfactuals where the outside option is held fixed. Short-dashed grey line marks the share of high risk consumers in counterfactuals that adjust the outside option to have the same level of voucher subsidy as the inside option. Longer-dashed grey line demarcates the share of high risk consumers in the PDP market as simulated under the social planner’s allocation. The plotted quantities are also reported in rows 21 plus 22, columns 10-12 of Table 3 (for fixed outside option); rows 22 plus 23 of columns 5-7 in Table 5 (for adjusted outside option) and rows 22 plus 23 of column 1 in Table 4 (for social planner).

prices of other pharmaceutical insurance options, or drug prices. We intend for this adjustment to capture the idea that when a government reforms one publicly-subsidized program, 

25In practice, this is implemented by adjusting the utility of choosing the inside option. We discuss the details of the adjustment calculation in Appendix F. 

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it is likely to implement similar reforms in related programs. In the case of Medicare Part D, PDP and MA-PD are obviously closely-related substitutes, but this general idea holds more broadly—few publicly-subsidized program exist in isolation. The results are given in Table 5. There are two additional rows (6 and 26) included in the table in comparison to Table 3, listing the additional payments that the government makes to the MA-PD in each counterfactual relative to the observed subsidy levels in MA-PD (row 6), and the dollar amount of the adjustment we make to the outside option (row 26). A positive number in row (26) implies that the outside option becomes more attractive. There are two ways in which MA-PD related computations change in these results. Row 6 accounts for how much more or less the government needs to pay to consumers that purchase the MA-PD (i.e. outside) option. Rows 8 and 9 that measure the opportunity cost of government funds are also adjusted to reflect a similar change in what the government would have paid for PDP enrollees if they switched to MA-PD.

A common thread across all counterfactuals with adjusted outside option is that sorting between the inside and outside options (and across risk types within the inside option) is very similar to the observed allocation. This is intuitive, as by adjusting the outside option, we are essentially restoring the observed differences between the two enrollment options. In counterfactuals in which we remove the linkages across LIS, MA-PD and PDP markets, or alter the degree of market power, PDP insurer bids and consumer premiums decrease slightly in face of a more attractive and hence more competitive outside option (columns 1-4). Consumer surplus increases while government payments net of the opportunity cost decrease, given that we are subsidizing PDP and MA-PD in similar ways. As a result, total surplus accounting for the opportunity cost of government funds in these counterfactuals is roughly $500M higher relative to that computed for the same countefactuals in Table 3.

We observe similarly intuitive changes in the counterfactuals that consider flat subsidies. As Figure 1 shows, for voucher levels that are close to the observed subsidy level (up until around $1,000) the surplus of counterfactuals with adjusted outside option is reasonably close—only somewhat higher—to that of both the observed allocation and the counterfactuals without the outside option adjustments. The optimal voucher with adjusted outside option is substantially higher, at $1,200 versus $800 in the non-adjusted case. This is again driven by the more attractive outside option creating competition for PDP plans leading to lower bids, premiums, and relative subsidies. Figure 3 highlights the stabilization of the market movement when we adjust the outside option—the share of high risk consumers remains stable at the observed levels until the voucher increases above $900; at the highest voucher
levels, the equilibrium level of high risk consumers converges to the same level as that under the counterfactuals without outside option adjustments, remaining somewhat closer to the optimal social planner level. Moreover, as we observe in Figure 1, with high vouchers applied to both the inside and outside options, the market achieves the level of surplus that is equal to the social planner. This effect is generated entirely by significant changes in the opportunity cost of government funds that results when we adjust the outside options that is driven by fixed MA-PD prices that do not respond to more generous subsidies. This highlights the general principle that to the extent that the government can control the level of prices in the market (in this case this happens mechanically as we do not allow MA-PD prices to adjust), higher subsidies can generate substantial consumer surplus. This surplus is still generated at very high nominal government spending. Without accounting for the opportunity cost of government funds, the voucher of $1,200 (column 6) generates negative $13B in surplus, loosing 39 cents on each dollar spent.

The general takeaway is twofold. First, the evaluation of subsidized programs is challenging in the presence of possibly subsidized substitutes, which is commonplace in many settings. Whether there is a positive return on a dollar spent in one program depends crucially on how this dollar would have been spent in related programs on the same beneficiaries. This phenomenon is very transparent in markets with close substitutes such as PDP and MA-PD, but is likely to still be important, but less obvious, in other programs (for example, health insurance coverage and charity care as examined in Finkelstein et al., 2017). Second, if substitute and related programs are likely to be subject to the same policies as the program of interest, estimating the general equilibrium effects may be necessary to understand the full economic impact of changes in both programs. Without general equilibrium estimates, it is useful to focus on partial equilibrium analysis that holds substitutes fixed to understand the economic forces of, for example, the subsidy design mechanisms as we do in Table 3.

6 Conclusion

In this paper we have analyzed the welfare effects of the mechanism for determining subsidies for Prescription Drug Plans in Medicare Part D, focusing in particular on the supply side of the market. We draw several conclusions for our specific empirical setting. First, we find that the current PDP program is efficient only if we account for the fact that the government would likely subsidize the same consumers outside of the PDP program as well. Without taking the latter into account, we could conclude that the program only generates a fraction
of dollar value that is spent on it from the federal budget. This is due to two related factors. First, demand for PDP plans is generated almost exclusively by high subsidies—consumers have very low willingness-to-pay for unsubsidized plans, driven by the availability of close substitutes. Second, this market is imperfectly competitive and firms are able to capture some of the rents of the subsidy mechanism.

On the supply-side we find, perhaps surprisingly, that the current structure of the program mutes insurers’ ability to raise subsidies, and hence positively affects total welfare. This is due to the complex way in which prices for distinct parts of the program, such as Medicare Advantage Prescription Drug coverage, Low Income Subsidies, and market premiums for regular beneficiaries in PDP plans, are all tied together into one mechanism. We find that the current mechanism that incorporates multiple parts of the program into an average that is used to calculate subsidies, is similar in its incentives to a pre-determined optimal voucher mechanism. We find that providing flat vouchers that are optimally set ex ante could increase the total surplus in levels and relative to federal dollars spent, but not by a large amount (although a flat voucher mechanism could dramatically reduce the cost of administering the program, an effect that we do not include in our calculations). We further find that removing the averaging and setting proportional subsidies would lead to a rapid upward price spiral, as the competitive pressure on the market is not strong enough to mitigate the “raising-the-subsidy” incentives.

Further, our analysis reveals a close connection between Part D PDP and Medicare Advantage that, although not emphasized in prior literature, proved to be crucial for our findings. We believe that our approach to the quantification of welfare that gradually removes interlinked parts of the environment—specifically, LIS bidding incentives and MA-PD part of the bid average—can be useful for the analysis of many other public programs that do not exist in isolation, but, instead, are linked to each other through the choices of consumers and producers or through government transfers.

Beyond the Part D context, our setting that is characterized by the presence of two publicly subsidized programs that are close substitutes, sheds light on the challenges inherent in the analysis of economic returns to any dollar spent on social insurance programs. In many such programs, and especially healthcare, the government faces a version of the Samaritan’s dilemma. If public funds are ultimately used to pay for individuals’ healthcare needs through some channel, then the question the policy-maker faces is not whether to subsidize healthcare use, but finding the most efficient way of doing it. This idea lies at the heart of our results—funding the public benefit that we analyze makes economic sense only insofar as there would
be some expenditures on the activities related to this benefit in all counterfactual policies that are plausibly available to the government. This insight has broad implications for the empirical analysis of economic returns to many other public policies that is frequently done in isolation of potentially less obvious substitutes.

While our empirical analysis focused on the subsidy mechanism in the Medicare Part D program, our findings have broader implications for market design of privately-provisioned and publicly-subsidized social insurance programs. As in any setting with the equity-efficiency trade-off, subsidy policies will have efficiency costs for the market. One source of such inefficiencies is market power. Subsidies create incentives for imperfectly competitive insurers to raise markups and pass them through to the price inelastic government. In the paper we illustrate that the details of the subsidy mechanism matter dramatically for how these incentives play out. Further, depending on whether the policy is guided by the considerations of consumer surplus, total welfare, or government spending, we demonstrate that different subsidy mechanisms deliver drastically different results across these three measures of surplus. Overall, we argue that, the less-studied supply-side behavior in the presence of regulatory intervention and subsidization plays a key role in determining the efficiency outcomes of privately-provided social insurance programs. Answering the general question about the optimal mechanism design in these increasingly economically relevant settings presents an important avenue for future empirical and theoretical research.

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**Kesternich, Iris, Florian Heiss, Daniel McFadden, and Joachim Winter**, “Suit the action to the word, the word to the action: Hypothetical choices and real decisions in Medicare Part D,” *Journal of Health Economics*, 2013, 32(6), 1313–1324.


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Table 1: Summary Statistics

<table>
<thead>
<tr>
<th></th>
<th>Mean (1)</th>
<th>Standard deviation (2)</th>
<th>Min (3)</th>
<th>Max (4)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>A. Contracts</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>(1) Number of PDP plans per market</td>
<td>49</td>
<td>5.00</td>
<td>35</td>
<td>64</td>
</tr>
<tr>
<td>(2) Number of insurers per market</td>
<td>16</td>
<td>0.60</td>
<td>14</td>
<td>17</td>
</tr>
<tr>
<td>(3) Unweighted average PDP premium</td>
<td>$505</td>
<td>$59</td>
<td>$375</td>
<td>$643</td>
</tr>
<tr>
<td><strong>B. Subsidies</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>(4) CMS average national bid</td>
<td>$1,001</td>
<td>$45</td>
<td>$965</td>
<td>$1,060</td>
</tr>
<tr>
<td>(5) CMS base consumer premium</td>
<td>$353</td>
<td>$26</td>
<td>$328</td>
<td>$383</td>
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<tr>
<td>(6) CMS subsidy for average risk beneficiary</td>
<td>$648</td>
<td>$20</td>
<td>$631</td>
<td>$677</td>
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<tr>
<td>(7) Low income benchmark threshold</td>
<td>$354</td>
<td>$24</td>
<td>$333</td>
<td>$388</td>
</tr>
<tr>
<td><strong>C. Enrollment, millions</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
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<tr>
<td>(8) All Part D eligible</td>
<td>1.32</td>
<td>1.00</td>
<td>0.06</td>
<td>4.76</td>
</tr>
<tr>
<td>(9) PDP enrollment, regular</td>
<td>0.26</td>
<td>0.18</td>
<td>0.01</td>
<td>0.70</td>
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<tr>
<td>(10) PDP enrollment, low income^</td>
<td>0.24</td>
<td>0.20</td>
<td>0.01</td>
<td>1.02</td>
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<tr>
<td>(11) MA-PD enrollment, regular</td>
<td>0.21</td>
<td>0.25</td>
<td>0.00</td>
<td>1.38</td>
</tr>
<tr>
<td>(12) MA-PD enrollment, low income^</td>
<td>0.05</td>
<td>0.06</td>
<td>0.00</td>
<td>0.25</td>
</tr>
<tr>
<td>(13) Employer sponsored coverage</td>
<td>0.20</td>
<td>0.16</td>
<td>0.01</td>
<td>0.48</td>
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<td>(14) Other coverage sources</td>
<td>0.17</td>
<td>0.11</td>
<td>0.01</td>
<td>0.48</td>
</tr>
<tr>
<td>(15) No creditable coverage</td>
<td>0.19</td>
<td>0.13</td>
<td>0.01</td>
<td>0.58</td>
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<tr>
<td><strong>D. Distribution of risk types among enrollees, %</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>(16) Risk type 1, regular consumers</td>
<td>5%</td>
<td>2%</td>
<td>3%</td>
<td>15%</td>
</tr>
<tr>
<td>(17) Risk type 2, regular consumers</td>
<td>20%</td>
<td>5%</td>
<td>11%</td>
<td>40%</td>
</tr>
<tr>
<td>(18) Risk type 3, regular consumers</td>
<td>39%</td>
<td>5%</td>
<td>19%</td>
<td>52%</td>
</tr>
<tr>
<td>(19) Risk type 4, regular consumers</td>
<td>7%</td>
<td>2%</td>
<td>2%</td>
<td>12%</td>
</tr>
<tr>
<td>(20) Risk type 5, regular consumers</td>
<td>1%</td>
<td>0%</td>
<td>0%</td>
<td>1%</td>
</tr>
<tr>
<td>(21) Consumers eligible for low-income subsidy</td>
<td>30%</td>
<td>6%</td>
<td>9%</td>
<td>45%</td>
</tr>
</tbody>
</table>

\(^1\) Across 136 region-years (34 geographic markets in years 2007-2010)
\(^2\) Enrollment statistics based on CMS data on the whole market, not the analytic sample
\(^3\) Counts of regular versus low income enrollment approximated using plan-level LIS counts enrollment
\(^4\) Based on the analytic sample as described in Section 4
Table 2: Results: Demand and Marginal Cost

<table>
<thead>
<tr>
<th>Parameters of the utility function</th>
<th>Risk type 1</th>
<th>Risk type 2</th>
<th>Risk type 3</th>
<th>Risk type 4</th>
<th>Risk type 5</th>
<th>LIS</th>
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</thead>
<tbody>
<tr>
<td>Premium, $000</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mean</td>
<td>3.16</td>
<td>3.25</td>
<td>2.46</td>
<td>2.56</td>
<td>2.56</td>
<td>-7.93</td>
</tr>
<tr>
<td>Standard deviation</td>
<td>(0.35)</td>
<td>(0.61)</td>
<td>(0.33)</td>
<td>(0.38)</td>
<td>(0.39)</td>
<td>(0.56)</td>
</tr>
<tr>
<td>Standard deviation, inner option</td>
<td>0.24</td>
<td>0.50</td>
<td>0.11</td>
<td>0.33</td>
<td>-0.07</td>
<td>-</td>
</tr>
<tr>
<td>Annual deductible, $000</td>
<td>-10.61</td>
<td>-11.36</td>
<td>-8.00</td>
<td>-7.97</td>
<td>-7.92</td>
<td>-</td>
</tr>
<tr>
<td>Indicator for having any coverage in the gap</td>
<td>3.83</td>
<td>3.75</td>
<td>1.82</td>
<td>3.38</td>
<td>4.62</td>
<td>-</td>
</tr>
<tr>
<td>Standard deviation</td>
<td>(2.08)</td>
<td>(1.32)</td>
<td>(1.12)</td>
<td>(0.86)</td>
<td>(1.14)</td>
<td>-</td>
</tr>
<tr>
<td>Number of most common drugs covered</td>
<td>47.87</td>
<td>34.03</td>
<td>40.85</td>
<td>43.92</td>
<td>60.00</td>
<td>1.05</td>
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<tr>
<td>Measure of pharmacy network breadth</td>
<td>0.36</td>
<td>0.35</td>
<td>0.24</td>
<td>0.31</td>
<td>0.28</td>
<td>0.10</td>
</tr>
<tr>
<td>Number of years the plan is on the market</td>
<td>1.09</td>
<td>1.24</td>
<td>1.07</td>
<td>1.05</td>
<td>0.92</td>
<td>0.48</td>
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<tr>
<td>F-statistic first stage across all risk types</td>
<td>245</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>23</td>
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</tbody>
</table>

Panel B: Marginal cost projection for non-LIS market

| Annual deductible, $000                      | -0.19     | -0.23      | -0.29      | -0.42      | -0.52      |     |
| Number of most common drugs covered         | -0.78     | -0.30      | -0.11      | -2.11      | -2.83      |     |
| Indicator for having any coverage in the gap | 0.30       | 0.36       | 0.46       | 0.68       | 0.83       |     |
| Measure of pharmacy network breadth         | -0.096    | -0.14      | -0.18      | -0.28      | -0.34      |     |
| Number of years the plan is on the market   | 0.03      | 0.04       | 0.04       | 0.06       | 0.08       |     |
| Mean dependent variable (inverted MC, $000) | 0.67       | 0.80       | 1.00       | 1.46       | 1.81       |     |
| Standard deviation dependent variable       | 0.16      | 0.20       | 0.25       | 0.36       | 0.44       |     |
| R-squared                                   | 0.77       | 0.76       | 0.76       | 0.76       | 0.76       |     |
| N                                            | 756        | 756        | 756        | 756        | 756        |     |

The table reports parameter estimates for demand models as described in Section 3.1 (Panel A). The parameters are reported separately for risk types 1 to 5 of regular consumers (columns 1-5) and consumers eligible for low income subsidies (column 6). We report standard errors in parentheses. All models include, but do not report: a constant, fixed effects for parent organizations, year fixed effects, geographic market fixed effects, a dummy for an enhanced plan, the number of drugs on the plan’s formulary, and the number of drugs placed in Tiers 1-2 of the formulary. F-statistics are reported for the first stage regressions of regular (column 1) and LIS (column 6) premiums on price instruments as described in Section 4. Panel B reports the results of a hedonic regression of marginal costs - for plans not distorted by LIS random assignment incentives - estimated via the inversion of the first order conditions on plan characteristics in 2010. The regression includes the same plan characteristics as the demand model for regular consumers.
<table>
<thead>
<tr>
<th></th>
<th>Observed Allocation</th>
<th>Remove cross-market links</th>
<th>Change market power</th>
<th>Subsidies proportional to bids</th>
<th>Flat voucher subsidies</th>
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</thead>
<tbody>
<tr>
<td></td>
<td>Regular enrollees</td>
<td>US enrollees</td>
<td>No LIS link</td>
<td>No LIS, no MA-PD link</td>
<td>Independent Ram</td>
</tr>
<tr>
<td></td>
<td>(1)</td>
<td>(2)</td>
<td>(3)</td>
<td>(4)</td>
<td>(5)</td>
</tr>
<tr>
<td>(1) Consumer surplus, $M</td>
<td>2,298</td>
<td>2,642</td>
<td>2,678</td>
<td>3,028</td>
<td>3,080</td>
</tr>
<tr>
<td>(2) Insurer profit, $M</td>
<td>559</td>
<td>-</td>
<td>1,062</td>
<td>1,205</td>
<td>1,154</td>
</tr>
<tr>
<td>(3) Consumer and producer surplus, $M</td>
<td>2,857</td>
<td>2,642</td>
<td>3,799</td>
<td>4,233</td>
<td>4,235</td>
</tr>
<tr>
<td>(4) Subsidy spending in PDP, $M</td>
<td>4,181</td>
<td>14,210</td>
<td>5,686</td>
<td>6,881</td>
<td>6,964</td>
</tr>
<tr>
<td>(5) Reinsurance spending in PDP, $M</td>
<td>1,264</td>
<td>26,502</td>
<td>1,502</td>
<td>1,692</td>
<td>1,764</td>
</tr>
<tr>
<td>(6) Total government spending, $M</td>
<td>5,445</td>
<td>40,712</td>
<td>7,188</td>
<td>8,573</td>
<td>8,728</td>
</tr>
<tr>
<td>(7) Counterfactual subsidy spending if enrolled in MA-PD, $M</td>
<td>4,686</td>
<td>16,469</td>
<td>5,680</td>
<td>6,466</td>
<td>6,548</td>
</tr>
<tr>
<td>(8) Counterfactual reinsurance spending if enrolled in MA-PD, $M</td>
<td>1,209</td>
<td>17,496</td>
<td>1,455</td>
<td>1,649</td>
<td>1,669</td>
</tr>
<tr>
<td>(9) Total opportunity cost of government spending, $M</td>
<td>5,894</td>
<td>33,965</td>
<td>7,135</td>
<td>8,115</td>
<td>8,217</td>
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<tr>
<td>(10) Total surplus; not accounting for opportunity cost of gov. spending, $M</td>
<td>4,222</td>
<td>50,283</td>
<td>5,605</td>
<td>6,912</td>
<td>7,112</td>
</tr>
<tr>
<td>(11) Total surplus; accounting for opportunity cost of gov. spending, $M</td>
<td>3,441</td>
<td>6,129</td>
<td>3,671</td>
<td>3,638</td>
<td>3,570</td>
</tr>
<tr>
<td>(12) Return on nominal dollar of gov. spending, $, no DWL of tax</td>
<td>(0.48)</td>
<td>(0.94)</td>
<td>(0.48)</td>
<td>(0.51)</td>
<td>(0.51)</td>
</tr>
<tr>
<td>(13) Return on nominal dollar of gov. spending, $, with DWL of tax</td>
<td>(0.60)</td>
<td>(0.95)</td>
<td>(0.60)</td>
<td>(0.62)</td>
<td>(0.63)</td>
</tr>
<tr>
<td>(14) Opportunity cost adjusted return on dollar of gov. spending, $</td>
<td>0.63</td>
<td>(0.15)</td>
<td>0.51</td>
<td>0.42</td>
<td>0.41</td>
</tr>
</tbody>
</table>

**Table 3: Results: Counterfactual Subsidy Mechanisms with Fixed Outside Option**

Table reports the levels of consumer surplus, producer surplus, government spending, and total welfare under the observed allocation (columns 1 and 2) and under counterfactual allocations with a fixed outside option (columns 3 to 12). We compute these objects using estimates of demand and marginal costs (for columns 1 and 2), as well as simulations of counterfactual equilibria (columns 3 to 12). All quantities are computed as discussed in Section 3 and Appendix Section E. These baseline results assume that the cost of public funds (λ) is equal to 1.3. Negative quantities reported in parentheses.
Table 4: Results: Allocations and Welfare under Non-Market Mechanisms

<table>
<thead>
<tr>
<th>Description</th>
<th>Planner Social Planner (1)</th>
<th>Public Option with subsidy (2)</th>
<th>Public Option without subsidy (3)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Consumer surplus, $M</td>
<td>3,258</td>
<td>3,005</td>
<td>970</td>
</tr>
<tr>
<td>Insurer profit, $M</td>
<td>(7,088)</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Consumer and producer surplus, $M</td>
<td>(3,830)</td>
<td>3,005</td>
<td>970</td>
</tr>
<tr>
<td>Subsidy spending in PDP, $M</td>
<td>-</td>
<td>6,860</td>
<td>-</td>
</tr>
<tr>
<td>Reinsurance spending in PDP, $M</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Additional subsidy spending in MA-PD, $M</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Total government spending, $M</td>
<td>-</td>
<td>6,860</td>
<td>-</td>
</tr>
<tr>
<td>Counterfactual subsidy spending if enrolled in MA-PD, $M</td>
<td>6,943</td>
<td>5,599</td>
<td>154</td>
</tr>
<tr>
<td>Counterfactual reinsurance spending if enrolled in MA-PD, $M</td>
<td>1,770</td>
<td>1,433</td>
<td>41</td>
</tr>
<tr>
<td>Total opportunity cost of government spending, $M</td>
<td>8,713</td>
<td>7,032</td>
<td>195</td>
</tr>
<tr>
<td>Total surplus; not accounting for opportunity cost of gov. spendin</td>
<td>(3,830)</td>
<td>(5,912)</td>
<td>970</td>
</tr>
<tr>
<td>Total surplus; accounting for opportunity cost of gov. spending, $</td>
<td>5,371</td>
<td>3,229</td>
<td>1,223</td>
</tr>
<tr>
<td>Return on nominal dollar of gov. spending, $, no DWL of tax</td>
<td>-</td>
<td>(0.56)</td>
<td>-</td>
</tr>
<tr>
<td>Return on nominal dollar of gov. spending, $, with DWL of tax</td>
<td>-</td>
<td>(0.66)</td>
<td>-</td>
</tr>
<tr>
<td>Opportunity cost adjusted return on dollar of gov. spending, $</td>
<td>-</td>
<td>0.47</td>
<td>-</td>
</tr>
</tbody>
</table>

(16) Characteristics of the allocation

<table>
<thead>
<tr>
<th>Description</th>
<th>Planner Social Planner (1)</th>
<th>Public Option with subsidy (2)</th>
<th>Public Option without subsidy (3)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Inside option enrollment, '000</td>
<td>12,374</td>
<td>10,237</td>
<td>322</td>
</tr>
<tr>
<td>Inside option enrollment, percent of total market</td>
<td>57</td>
<td>47</td>
<td>1</td>
</tr>
<tr>
<td>Share of inside option enrollment by Risk Group 1 consumers, per</td>
<td>7</td>
<td>9</td>
<td>1</td>
</tr>
<tr>
<td>Risk Group 2</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Risk Group 3</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Risk Group 4</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Risk Group 5</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Average weighted premium, $</td>
<td>374</td>
<td>87</td>
<td>728</td>
</tr>
<tr>
<td>Average weighted bid, $</td>
<td>374</td>
<td>758</td>
<td>728</td>
</tr>
</tbody>
</table>

Table reports the level of consumer surplus, producer surplus, government spending, and total welfare under counterfactual allocations without market mechanisms. The non-market mechanisms are defined in Section 5.1. To compute these objects, we use estimates of demand, marginal costs, and the derivation of the social planner’s problem in Appendix Section E. All quantities are computed as discussed in Section 3 and Appendix Section E. These baseline results assume that the cost of public funds (λ) is equal to 1.3. Negative quantities are reported in parentheses.
**Table 5: Results: Counterfactual Subsidy Mechanisms with Adjusted Outside Option**

<table>
<thead>
<tr>
<th>No LIS link</th>
<th>No LIS, no MA-PD link</th>
<th>Independent Plans</th>
<th>Monopoly Ownership</th>
<th>$0</th>
<th>$1,200</th>
<th>$1,500</th>
</tr>
</thead>
<tbody>
<tr>
<td>(1) Consumer surplus, $M</td>
<td>3,504</td>
<td>4,189</td>
<td>4,227</td>
<td>4,410</td>
<td>(12,460)</td>
<td>9,577</td>
</tr>
<tr>
<td>(2) Insurer profit, $M</td>
<td>873</td>
<td>914</td>
<td>881</td>
<td>1,220</td>
<td>832</td>
<td>1,992</td>
</tr>
<tr>
<td>(3) Consumer and producer surplus, $M</td>
<td>4,378</td>
<td>5,103</td>
<td>5,108</td>
<td>5,630</td>
<td>(11,628)</td>
<td>11,569</td>
</tr>
<tr>
<td>(4) Subsidy spending in PDP, $M</td>
<td>4,725</td>
<td>5,269</td>
<td>5,366</td>
<td>4,266</td>
<td>(920)</td>
<td>15,596</td>
</tr>
<tr>
<td>(5) Reinsurance spending in PDP, $M</td>
<td>1,252</td>
<td>1,306</td>
<td>1,368</td>
<td>957</td>
<td>1,152</td>
<td>2,335</td>
</tr>
<tr>
<td>(6) Additional subsidy spending in MA-PD, $M</td>
<td>442</td>
<td>802</td>
<td>789</td>
<td>1,415</td>
<td>(10,344)</td>
<td>943</td>
</tr>
<tr>
<td>(7) Total government spending, $M</td>
<td>6,419</td>
<td>7,377</td>
<td>7,522</td>
<td>6,638</td>
<td>(10,112)</td>
<td>18,874</td>
</tr>
<tr>
<td>(8) Counterfactual subsidy spending if enrolled in MA-PD, $M</td>
<td>5,075</td>
<td>5,545</td>
<td>5,649</td>
<td>4,363</td>
<td>(448)</td>
<td>12,297</td>
</tr>
<tr>
<td>(9) Counterfactual reinsurance spending if enrolled in MA-PD, $M</td>
<td>1,203</td>
<td>1,257</td>
<td>1,280</td>
<td>962</td>
<td>1,075</td>
<td>2,274</td>
</tr>
<tr>
<td>(10) Total opportunity cost of government spending, $M</td>
<td>6,278</td>
<td>6,802</td>
<td>6,929</td>
<td>5,325</td>
<td>627</td>
<td>14,571</td>
</tr>
<tr>
<td>(11) Total surplus; not accounting for opportunity cost of gov. spending, $M</td>
<td>3,967</td>
<td>(4,487)</td>
<td>(4,671)</td>
<td>(3,000)</td>
<td>1,517</td>
<td>(12,967)</td>
</tr>
<tr>
<td>(12) Total surplus; accounting for opportunity cost of gov. spending, $M</td>
<td>4,194</td>
<td>4,356</td>
<td>4,337</td>
<td>3,922</td>
<td>2,332</td>
<td>5,975</td>
</tr>
<tr>
<td>(13) Return on nominal dollar of gov. spending, $, no DWL of tax</td>
<td>(0.32)</td>
<td>(0.31)</td>
<td>(0.32)</td>
<td>(0.15)</td>
<td>0.15</td>
<td>(0.39)</td>
</tr>
<tr>
<td>(14) Return on nominal dollar of gov. spending, $, with DWL of tax</td>
<td>(0.48)</td>
<td>(0.47)</td>
<td>(0.48)</td>
<td>(0.35)</td>
<td>(0.12)</td>
<td>(0.53)</td>
</tr>
<tr>
<td>(15) Opportunity cost adjusted return on dollar of gov. spending, $</td>
<td>0.65</td>
<td>0.59</td>
<td>0.58</td>
<td>0.59</td>
<td>0.23</td>
<td>0.32</td>
</tr>
</tbody>
</table>

**Characteristics of the allocation**

| Inside option enrollment, '000 | 7,769 | 8,195 | 8,355 | 6,016 | 6,785 | 16,231 | 17,774 |
| Inside option enrollment, percent of total market | 36 | 38 | 39 | 28 | 31 | 75 | 82 |
| Share of inside option enrollment by Risk Group 1 consumers, percent | 6 | 6 | 6 | 6 | 6 | 7 | 7 |
| Risk Group 2 | 17 | 17 | 17 | 18 | 17 | 16 | 16 |
| Risk Group 3 | 59 | 60 | 60 | 56 | 58 | 64 | 65 |
| Risk Group 4 | 16 | 16 | 16 | 19 | 18 | 11 | 11 |
| Risk Group 5 | 1 | 1 | 1 | 1 | 1 | 1 | 1 |
| Average weighted premium, $ | 466 | 427 | 429 | 414 | 1,224 | 94 | 86 |
| Average weighted bid, $ | 1,162 | 1,164 | 1,164 | 1,219 | 1,224 | 1,286 | 1,461 |
| Outside option adjustment, $ | 56 | 84 | 84 | 113 | (677) | 203 | 218 |

Table reports the level of consumer surplus, producer surplus, government spending, and total welfare under counterfactual allocations with an endogenously adjusted outside option. To compute these objects, we use estimates of demand, marginal costs, and simulations of counterfactual equilibria. All quantities are computed as discussed in Section 3 and Appendix Sections E and F. These baseline results assume that the cost of public funds ($\lambda$) is equal to 1.3. Negative quantities reported in parentheses.