

# Choice Inconsistencies Among the Elderly: Evidence from Plan Choice in the Medicare Part D Program

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The Medicare Part D Prescription Drug Plan represents the most significant privatization of the delivery of a public insurance benefit in recent history, with dozens of private insurers offering a wide range of products with varying prices and product features; the typical elder had a choice of roughly 40 stand-alone drug plans. In this paper we evaluate the choices of elders across this wide array of Part D options using a unique data set of prescription drug claims matched to information on the characteristics of choice sets. We first document that the vast majority of elders are choosing plans that are not on the “efficient portfolio” of plan choice in the sense that an alternative plan offers better risk protection at a lower cost. We then estimate several discrete choice models to document three dimensions along which elders are making choices which are inconsistent with optimization under full information: elders place much more weight on plan premiums than they do on expected out of pocket costs; they value plan financial characteristics beyond any impacts on their own financial expenses or risk; and they place almost no value on variance reducing aspects of plans. These findings are robust to a variety of specifications and econometric approaches. We perform a partial equilibrium welfare analysis which implies that welfare would have been 27% higher if patients had all chosen rationally. We conclude with a discussion of the implications of our findings for Medicare policy.

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The Medicare Modernization Act of 2003, better known as the legislation that added the Part D prescription drug benefit to the Medicare program, represents the single most significant expansion of public insurance programs in the U.S. in the past 40 years. The most novel, and controversial, feature of this legislation was the use of multiple private insurance providers to deliver this new public insurance product. Unlike the traditional model of government mandated uniform insurance packages for all enrollees, under the Part D program dozens of private insurers were allowed to offer a wide range of products with varying prices and product features. Perhaps most well-known was the extent to which plans covered the “donut hole”, a broad uncovered range of expenditures in the minimum mandated plan.

This unprecedented privatization of the delivery of a public insurance product raises a host of important policy questions. Primary among these is the impact of allowing choice across so many private insurance options. The typical elder in our data (described below) faces a choice of over 40 stand-alone drugs plans, and our estimates suggest that the range of cost from the most to least expensive option facing an elder is comparable to the mean of those costs. Choice is clearly meaningful in this context. Yet, to date, we know almost nothing about how elders are making these crucial choices.

This paper investigates the choices of elders for the newly formed Part D program in 2006. We analyze data that provides information on the Part D plans chosen and prescription drug utilization for a large sample of elders in the U.S. These data were collected by Wolters Kluwer (WK), a “switch agent” that lies between pharmacies that fill prescriptions and the insurance companies and prescription benefit managers that pay for them. WK collects information on almost one-third of all third party prescription

drug transactions, and we will use the universe of their data for those over age 65 during 2005-2006 to examine choice of Part D plan. We match to this data set a comprehensive set of information from the Centers for Medicare and Medicaid Services (CMS) on the Part D plans available to each person in our data set.

Specifically, for each elder whose claims appear in our sample, we model the financial implications of each of the plans in their choice set, based on both 2005 and 2006 drug utilization and several different models of expectations. We begin by presenting the basic facts on choice, documenting that the vast majority of elders are choosing plans that are not on the “efficient portfolio” of plan choice for that elder. We then turn to more rigorous multinomial models of individual choice to incorporate non-financial characteristics, preference heterogeneity and unobserved plan characteristics into our analysis.

Our findings are striking: along three dimensions, elders are making choices which are inconsistent with optimization under full information. First, elders place much more weight on plan premiums than they do on the expected out of pocket costs that they will incur under the plan. Second, consumers appear to value plan financial characteristics far beyond any impacts on their own financial expenses or risk. Third, consumers substantially under-value variance reducing aspects of alternative plans. The first two of these conclusions are robust to a variety of specifications and econometric approaches; the third is more sensitive.

Our paper proceeds as follows. Part I provides background on the Part D program and reviews the growing literature on its impacts. Part II discusses our data sources, and Part III presents initial results on choice set variation and choice behavior. Part IV

describes our choice framework, and Part V presents results. Part VI considers robustness to heterogeneity concerns. Part VII concludes with a discussion of the policy implications of our findings.

## **Part I: Background**

### The Medicare Part D Program

Medicare, which provides universal health insurance coverage to those over age 65 and to those on the disability insurance program, was established in 1965. The original program covered most medical needs for the elderly and disabled, including hospital and doctor costs, but it excluded coverage for prescription drugs. This omission was not perceived as a major one in the early years of the Medicare program, but in the 1990s the advancement of prescription drug treatments for common illnesses among the elderly drew attention to this gap in Medicare coverage. Medicare recipients, for example, spent an average of \$2,500 each on prescription drugs in 2003, more than twice what the average American spent on all health care in 1965.<sup>1</sup>

In 2003, the Bush administration and Congress reached agreement on a far-reaching prescription drug benefit package at a projected cost to the federal government of \$40 billion per year for its first ten years. The most noticeable innovation of the Part D plan is that this new Medicare benefit is not delivered by the government, but rather by private insurers under contract with the government. Beneficiaries can choose from three types of private insurance plans coverage of their drug expenditures. The first is stand-alone plans called Medicare Prescription Drug Plans (PDP) (a plan that just offers

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<sup>1</sup> Data for prescription drug spending comes from the Congressional Budget Office (2002). Data for average Americans' health spending comes from the "National Health Expenditures" section of the Centers for Medicare and Medicaid Services' *National Health Accounts*.

prescription drug benefits). In 2006, there were 1429 total PDPs offered throughout the nation, with most states offering about forty PDPs. The majority of PDPs are offered by a dozen national or near national companies.

The second alternative is Medicare Advantage (MA) plans, plans that provide all Medicare benefits, including prescription drugs, such as HMO, PPO, or Private FFS plans. There were 1314 total plans nationally in 2006. Finally, beneficiaries could retain their current employer/union plan, as long as coverage is “creditable” or at least as generous (i.e. actuarially equivalent) as the standard Part D plan, for which they would receive a subsidy from the government

Under Part D, recipients are entitled to basic coverage of prescription drugs by a plan with a structure actuarially equivalent to the following: none of the first \$250 in drug costs each year; 75% of costs for the next \$2,250 of drug spending (up to \$2,500 total); 0% of costs for the next \$3,600 of drug spending (up to \$5,100 total, the “donut hole”); and 95% of costs above \$5,100 of drug spending. Over 90% of beneficiaries in 2006, however, are not enrolled in the standard benefit design, but rather are in plans with low or no deductibles, flat payments for covered drugs following a tiered system, or some form of coverage in the donut hole. The main requirement for plans is that they must have equal or greater actuarial value than the standard benefit.<sup>2</sup> The government also placed restrictions on the structure of the formularies that plans could use to determine which prescription medications they would ensure. Overall, Part D sponsors have great flexibility in terms of plan design. Many insurance companies sponsored multiple plans of differing levels of premiums and coverage generosity. Arranging the data into cells by

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<sup>2</sup> Cover Memo for Medicare Part D Benefit Parameters: Annual Adjustments for Standard Benefit in 2007 (CMS)

plan sponsor and state, we find that only a quarter of the cells have only one plan, and 58% contain three plans. In those sponsor/state cells with multiple plans, most sponsors offer one standard plan and one or two enhanced plans.

Enrollment in Part D plans was voluntary for Medicare eligible citizens, although Medicare recipients not signing up by May 15, 2006 were subject to a financial penalty if they eventually joined the program (to mitigate adverse selection in the choice of joining the program). One group, however, was automatically enrolled: low income elders who had been receiving their prescription drug coverage through state Medicaid programs (the “dual eligibles”). These dual eligibles were enrolled in Part D plans by default if they did not choose one on their own. The Part D plans for dual eligibles could charge copayments of only \$1 for generics/\$3 for name brand drugs for those below the poverty line, and only \$2 for generics/\$5 for name brand drugs for those above the poverty line, with free coverage above the out of pocket threshold of \$3600.<sup>3</sup>

Despite reluctance voiced before the legislation passed, there was enormous interest from insurers in participating in the Part D program. By November 2006, 3,032 plans were being offered to potential Part D enrollees. Every county in the nation had at least 27 plans available; the typical county had 48 plans, while some counties featured more than 70 choices, primarily due to high number of MA plans.<sup>4</sup>

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<sup>3</sup> In addition, two other groups receive substantial subsidies – those found eligible for Low Income Subsidy (LIS) or for Partial Subsidy by the SSA. To qualify for LIS, beneficiaries must have income less than 135% of poverty and resources less than \$7,500/individual or \$12,000 couple. This group received benefits comparable to the dual eligibles with incomes above 100% of poverty. To qualify for Partial Subsidy, beneficiaries must have income at 135%-150% of poverty and resources less than \$11,500/individual or \$23,000/couple. This group can enroll in plans with a \$50 deductible, a 15% copayment up to the out of pocket threshold, and \$2/\$5 copayments above that point. In addition, premiums are fully paid by the government up to 135% of poverty, and then partially subsidized up to 150% of poverty.

<sup>4</sup> Details on number of plans in a median county obtained from Prescription Drug Plan Formulary and Pharmacy Network Files for 2006, provided by CMS.

Enrollment in the new Part D program was initially fraught with problems, but in the following months the federal government was able to iron out many of the problems that had arisen during the initial transition. As of June 2006, there were 10.4 million people enrolled in stand alone PDP plans, 5.5 million people enrolled in MA plans and about 6 million dual eligibles.<sup>5</sup> Yet 73% of people over 65 felt that the Medicare prescription drug benefit was too complicated, while 91% of pharmacists and 92% of doctors expressed this concern. When asked if they agree with the statement “Medicare should select a handful of plans that meet certain standards so seniors have an easier time choosing,” 60% of seniors answered “Yes.”<sup>6</sup>

Despite these reservations, there were no signs of diminished plan choice in subsequent years. The number of PDPs increased by about 30% in 2007, from 1,429 to 1,875 and remained at this level in 2008.<sup>7</sup>

#### Issues of Elder Choice in Part D

The use of this private delivery device, with such a multiplicity of choices, is a novel feature of the Part D legislation. Standard economic theory would suggest that this is a beneficial plan feature: allowing individuals to choose across a wide variety of plans that meet their needs, rather than constraining them to a limited set of choices being made by the government, can only increase welfare in the standard model in a partial equilibrium setting.

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<sup>5</sup> Enrollment data (rounded) taken from CMS, State Enrollment Data spreadsheet at [http://www.cms.hhs.gov/PrescriptionDrugCovGenIn/02\\_EnrollmentData.asp#TopOfPage](http://www.cms.hhs.gov/PrescriptionDrugCovGenIn/02_EnrollmentData.asp#TopOfPage). Enrollment numbers also available at <http://www.kff.org/medicare/upload/7453.pdf>.

<sup>6</sup> Kaiser Family Foundation and Harvard School of Public Health (2006).

<sup>7</sup> Hoadly et al. (2006). Data on 2008 plans taken from CMS 2008 PDP Landscape Source (v. 09.25.07) available at <http://www.cms.hhs.gov/prescriptiondrugcovgenin/>.

But there are reasons to believe that the standard model is insufficient, particularly for a population of elders. There is growing interest in behavioral economics in models where agents are better off with a more restricted choice set, as nicely reviewed in Iyengar and Kamenica (2006). Recent theoretical work shows that the traditional “more is better” principle may be reversed in some choice set contexts, for example when the presence or absence of options conveys information (Kamenica, 2006; Kuksov and Villas-Boas, 2005) or when agents have preferences with regret (Irons and Hepburn, 2003; Sarver, 2005). And a growing body of empirical work shows that individuals are less likely to participate in markets where they face more choice; decisions to purchase a good (Iyengar and Lepper, 2000; Boatwright and Nunes, 2001), take a loan (Bertrand et al., 2005) or enroll in a 401(k) plan (Iyengar, Huberman and Jiang, 2004) are found to decrease when participation requires choosing from a larger set of alternatives.

Iyengar and Kamenica (2006) find that not only the decision to participate in a market, but also the nature of choice itself, is affected by the size of the option set. They investigate choice over asset allocation in both laboratory and real-world (pension plan choice) settings, and find that individuals opt for safer investments when faced with a larger range of risky choices. In particular, they find that the presence of more investment options in a 401(k) plan leads to more frequent choice of money market or bond options rather than equity investment. Iyengar and Lepper (2000) also find that satisfaction with choices made falls with the size of the choice set in several experimental settings.

Another recent literature has shown that the nature of how choices are presented can have important impacts on choice. For example, Hastings and Tejada-Ashton (2008)



examine financially illiterate individuals choosing across retirement funds in Mexico's privatized Social Security system. They find that presenting information on plan administrative fees in pesos, rather than in percentage terms, causes a significant shift in choice towards lower fee plans. In another study, Chetty, Looney and Kroft (2007) find that consumers are much more sensitive to tax rates when the tax burden is included in posted prices rather than added at the register.

These issues may be paramount within the context of the elderly, given that the potential for cognitive failures rises at older ages. Salthouse (2004) shows clear evidence that the performance on a series of memory and analytic tasks declines sharply after age 60. Part of the reason for this may be the rise in incidence of dementia with age; starting at age 60, dementia rates roughly double every five years (Fratiglioni et al., 1999). A recent study by Agarwal et al. (2006) shows that in ten different contexts, ranging from credit card interest payments to mortgages to small business loans, the elderly pay higher fees and face higher interest rates than middle-aged consumers. These types of findings raise particular concern about choice in the Part D context.

#### Previous Studies of Part D Choice

We are aware of only three previous studies of these issues in the context of Part D. The first is a set of studies by Dan McFadden and colleagues, as summarized in McFadden (2006). These researchers surveyed a set of elders about their plans for enrolling in Part D programs, and evaluate whether enrollment intentions in the plan were "rational" given the penalties for delay. They find that 71% of potential enrollees were making the appropriate decision (under various assumptions about discount rates, etc.), while 10% of enrollees did not intend to enroll when it would be in their interests to do

so, and 19% intended enroll when it would be in their interest to delay. Thus, for most potential enrollees, the decision over whether to enroll seems to be made rationally.

Their findings are less sanguine, however, for choice of Part D plan. This survey offered individuals a choice of the standard plan described above versus alternatives that provide different levels of insurance coverage (e.g. catastrophic only, complete coverage, etc.), with corresponding actuarially fair premiums. They find that only about 36% of enrollees choose the cost-minimizing plan, and they do not place much value on the insurance aspects of more comprehensive plans. They conclude that “consumers are likely to have difficulty choosing among plans to fine-tune their prescription drug coverage, and do not seem to be informed about or attuned to the insurance feature of Part D plans.”

While this is an interesting set of findings, it provides only a preliminary look at the crucial issue of plan choice. These conclusions are based on data which do not contain precise detail about the prescription drugs used by individuals; assumptions about utilization are made using aggregate imputations from other sources. Moreover, this is based on hypothetical choices across a set of non-existing plans; individuals may become educated about the program when they are actually faced with plan choices. Thus, the failures of choice documented by McFadden (2006) may not hold when we use data on actual individual utilization and choices.

A recent paper by Lucarelli, Prince and Simon (2008) uses aggregate data on plan market shares to conduct a study of how plan features impact demand and to undertake a welfare analysis of choice restrictions. They estimate sizeable welfare losses from limiting the option set facing seniors. But they do so in a framework which assumes that

seniors are choosing optimally so that by definition restricting the choice set can only be harmful. Without individualized data on plan choices, they are unable to evaluate the underlying efficacy of plan choice.

Most closely related to our work is a recent field experiment by Kling et. al. (2008). They examine how providing people with information about the relative costs of each of the available plans in 2007 computed using their 2006 claims impacts their choices. They find that individuals who receive this intervention are more likely to switch plans, and more likely to end up with lower predicted and realized costs. Using our richer dataset on patient claims, we are able to model the individualized risk characteristics of plans in addition to looking just at average costs. Our model is also more general in terms of sample and implications. While they investigate the consequences of one particular intervention on a sample of patients at a single hospital, our model allows us to calculate the potential welfare gains from reforms which change the structure of the choice set, and to do so for a large fraction of Medicare Part D enrollees.

## **Part II: Data**

Our primary data source is a longitudinal sample of prescription drug records from the Wolters Kluwer (WK) Company. They are the largest “switch” operator in the prescription drug market: they collect the electronic claims from pharmacies and pass them on to the Pharmacy Benefit Managers (PBMs) and insurance companies that will pay the claims. After adjudicating the claim, it is passed back through the switch to the pharmacy. WK performs this function for a large sample of pharmacies throughout the

U.S. Once pharmacies are in their sample, there is a 93% chance that they remain enrolled, so this is effectively a longitudinal sample of pharmacies. On average the claims captured by the WK system represent almost 31% of all 3<sup>rd</sup> party prescription claims filled in the U.S.<sup>8</sup> The geographic distribution of these data is very closely representative of the geographic distribution of 3<sup>rd</sup> party claims as well; the correlation between the WK market share and the overall 3<sup>rd</sup> party market share across each of the states is 0.86.

WK keeps a longitudinal file that tracks prescription drug use for more than 100 million persons in the U.S. They have made available to us for research purposes a longitudinal sample of prescription claims for any individuals age 65 and over in 2005. These data are crucial because they are the only available data (of which we are aware) that contain information both on specific drug utilization by elders and on plan choice. Information about specific drug utilization is key because plan costs vary tremendously based on drug utilization, as we discuss below.

We begin with a sample of 1.53 million elders who (a) have a Part D claim with coverage of any sort (e.g. past the deductible), (b) are not employer-insured, dual eligibles or eligible for low-income subsidies/partial subsidies, (c) have claims for only one region of the country, (d) have no claims with missing payment information, (e) are in the sample of consistently reporting pharmacies, and (f) have data for both 2005 and 2006. This data file has a rich set of information about every drug claim for individuals in the longitudinal sample, including information on: month in which the prescription was filled; county of location of the pharmacy; a de-personalized patient id which allows longitudinal patient linkages; patient age; NDC code for the drug; quantity measures

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<sup>8</sup> Figure based on data provided by WK for Q3:2006.

(days supply, dosage, package size); patient and insurer payments; and insurer or PBM name. The total drug price is computed as the sum of patient and insurer payments; one or both of these values are blank for a small fraction of claims, and individuals with these claims are dropped. We constructed a crosswalk between the drug ID variable in the claims data and the NDC numbers listed on the formulary using a file from First Data Bank. To allow for the possibility of substitution if individuals were enrolled in a different plan, we constructed a coarser drug ID variable which is unique only up to drug name and assumed that individuals could substitute to the cheapest drug with the same name were they enrolled in an alternative plan.

WK has created a sample for us that links longitudinally all claims from elders that fill prescriptions at a pharmacy in their sample. Thus, there are three types of attrition from the sample. First, elders may die (in which case we still observe all of their claims). Second, pharmacies may enter or leave the sample. This can be addressed by using only pharmacies that are continuously in their sample.<sup>9</sup> Finally, individuals may switch pharmacies. If the switch is to a pharmacy within the WK sample, then the company does a detailed statistical match to ensure that the patient is captured and matched to other prescriptions (based on the de-identified form of data fields such as first name, last name, date of birth, year of birth, gender, health insurance id and zip code). If the switch is outside of the WK sample, then the individuals will be lost to this sample.

Unfortunately, there is no way to capture such transitions. So long as these transitions are not correlated with premiums, it will not bias our price elasticity estimate; so long as they are not correlated with plan cost sharing provisions, they will lead only to

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<sup>9</sup> A store is flagged as continuously enrolled provided that the store does not miss more than 11 days (including weekends and holidays) of reporting in a month.

a general understatement of out-of-pocket spending that will lead us to overstate that coefficient.

We can assess their importance by taking advantage of the fact that Wolters Kluwer provided us with a coverage level variable which indicates the proportion of pharmacies in each county which are covered by Wolters Kluwer. We have rerun our models on the 10% of counties where WK covers at least 40% of all third-party prescriptions, and our results are very similar to what we report below. This suggests that attrition is not significantly biasing our results.

#### The CMS Plans Database

We obtain information on availability of Part D plans and specific plan features directly from four files provided by CMS: the plan information file, the beneficiary cost file, the formulary file and the geographic locator file. The plan information file lists plan names and identifiers, and regions/counties in which plans are offered. The beneficiary cost file contains copays and coinsurance rates for different tiers of each plan. The formulary file contains a list of all the drugs that are included on the formulary for each plan. The geographic locator file allows us to identify all the Social Security Administration (SSA) counties that correspond to different PDP and MA regions.

The major strength of the CMS data is that it allows us to fully parameterize any elder's plan choice set based on their location. We have used these data to build a "cost calculator" that mimics the calculator provided on Medicare's web site. This calculator uses a given set of prescriptions for a given elder to compute their projected out of pocket spending in each plan available in their county.

#### Matching patients to their Part D Plan

One challenging aspect of the WK data is that we know each patient's county and the name of the company that provides the Part D plan that is covering each prescription, but not specifically which Part D plan offered by that company is covering the prescription. For example, we know that an elder is covered by a Humana product, but not whether it is Humana Complete, Humana Enhanced, etc.

Fortunately, we can resolve this matching problem in most cases by using a combination of county code, company name, and copayment structure. For each claim and each of the plans within the same company offered in a particular county, we check if the copay that the patient paid for this claim matches any of the prescribed copays of the plan. We assign a person to a plan if most of their claims match to the same unique Part D plan. We carry out this exercise for each month. To confirm that a person has been matched to a correct Part D plan, we look at all the months together and insist that a person be consistently matched to the same plan in each month from June 2006 on, since enrollment into Part D plans was open until May 15<sup>th</sup> 2006.

Of the approximately 1.53 million individuals in our sample, 50.5% were matched to Part D plans. The remainder were excluded either because they had a large number of non-Part D claims (implying that they have some other form of coverage), because they had too few claims to reliably match, or because their copays were inconsistent with the copays listed for Part D plans in their region.

Of the matched individuals, 57.1% were uniquely matched to a Part D plan, and 42.9% were multiply matched (meaning that more than one Part D plan was consistent with their copays). While the unique matches are clear, excluding multiple matches leads us to misstate the proportion of enrollment in some plans. This problem is especially

severe among Humana plans because Humana offers several plans which differ only in the deductible and donut hole coverage and thus cannot generally be distinguished on the basis of copays. While comprising 20% of all matches, Humana plans are only 10% of unique matches. To deal with this problem, we include both unique and multiple matches, with multiple matches randomly assigned to one of the plans to which they are matched with probability equal to the proportion of total national enrollment in that plan in 2006.<sup>10</sup>

#### Construction of Out of Pocket Cost Variables

The total enrollee costs of Part D can be decomposed into premiums, which are known for certain at the time of plan choice, and the distribution of out of pocket costs given the information available at the time when plans are chosen. Our focus is on estimating the distribution of costs given all of the information potentially available to individuals at the time when they make their choice. There are three reasons that estimating this distribution is challenging: first, we only observe realized out of pocket costs for the plan in which an individual is enrolled; second, we observe only a single realization of out of pocket costs for each individual (making it impossible to compute a variance measure); and third, we do not observe all of the information available to individuals at the time when they make their choice.

To handle the first difficulty, we assume that the set of 2006 claims is fixed and would remain constant had the individual in question chosen a different plan; that is, we assume no moral hazard. This assumption allows us to use the calculator to determine what each individual's realized costs would be for each plan in their choice set. Given typical estimates of the elasticity of prescription drug utilization in the range of 0.2 to 0.5,

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<sup>10</sup> Regional enrollment figures are not available at the plan level in 2006 for most plans.



and considering that this would only impact our results to the extent that individuals have sufficient foresight to take into account future utilization effects in their plan choices, this is a fairly innocuous assumption, as shown in Appendix A to Gruber and Abaluck (2008).

To handle the second difficulty, we sample realized costs from 200 individuals who are “identical” to the individual in question at the time when the plan choice is made. In practice, we define “identical” as individuals with the same decile of 2005 drug expenditures, 2005 days supply of branded drugs and 2005 days supply of generic drugs; after extensive searching, we found that this combination provided the best prediction of 2006 prescription drug spending based on 2005 characteristics. We therefore assign each individual to one of 1000 cells demarcated by the interacted deciles of these measures. We restrict our sample to individuals for whom there are at least 200 other individuals in their cell, and we use these 200 individuals in each cell to compute both our rational expectations measure of utilization in 2006 (described below) and our variance measure.

The third difficulty is that individuals may actually know more than can be predicted given 2005 costs at the time when they make their plan choices. Intuitively, we can attempt to determine whether individuals know more than can be predicted given 2005 costs by analyzing whether their choices are sensitive to the component of the variation in realized costs across plans which cannot be predicted given 2005 characteristics. We discuss a model of this type in Part V.

### Final Sample Creation

Under Part D individuals could enroll not only in a stand alone PDP plan, but also in a more comprehensive MA plan; we distinguish between individuals matched to MA and those matched to PDP plans based on copay and exclude the former. We focus just

on PDP plans (and therefore, just on individuals who chose PDP plans) because MA plans involve broader health care decisions which are beyond the scope of our data (e.g. regarding HMOs and fee-for-service plans). This exclusion is justified by the “independence of irrelevant alternatives” assumption that underlies our logit modeling, as discussed (and tested) further below. We also exclude individuals who have fewer than 500 observations in their state or fewer than 100 observations in their brand/state cell to increase the speed of estimation of the model by reducing the required number of brand/state fixed effects; this restriction has no effect on our final results.

Our final sample consists of 477,393 individuals. The typical patient in this sample is almost 75 years old, three-fifths are female, and they have an average of 34 claims per year. Their total prescription drug spending averages \$1711 per year. While some individuals were enrolled in Part D for the full year, others enrolled as late as May. The average total premiums paid after enrollment was \$287 and the average OOP costs paid out over the same period was \$666. This is the sample used in the efficient frontier analysis below. In our conditional logit models, we randomly subsample 20% of these individuals for computational reasons. We estimate the more computationally demanding random coefficients models on a randomly chosen subsample of 15,000 patients.

The distribution of enrollees across Part D plans is highly correlated in this final sample with the national facts on PDP enrollment provided by CMS. The correlation between the share by brand in our sample and the CMS sample is 0.98, and the correlation between the share of our sample in the top 10 plans is correlated with the CMS reported share in those plans at 0.89 (the correlation for the top 100 plans is 0.91).

### Part III: Facts on Plan Choice

To motivate our regression framework, Figure 1 shows the basic facts on the relationship of plan choice to total plan costs. For each individual in the data, we estimate the total cost of enrolling in each PDP plan in their county, adding both premiums and expected out of pocket costs. We then estimate the difference in total costs between the plan chosen by that individual and the lowest cost plan in their county. For this exercise, we use a perfect foresight model of expectations, using actual 2006 expenditures to estimate the costs that individuals face in each plan.

As Figure 1 shows, only 12.2% of individuals choose the lowest cost plan in their state. Indeed, on average, individuals could save 30.9% of their total Part D spending by choosing the lowest cost plan rather than the plan they chose. If we redo these calculations using actual 2005 expenditures, or predicted 2006 expenditures based on 2005 expenditures rather than actual 2006 expenditures, we find even stronger deviations from the lowest cost plan.<sup>11</sup>

Of course, individuals are not simply choosing a fixed payment stream when choosing a Part D plan; individuals who are highly risk averse may explicitly be choosing plans with higher mean expenditure to protect themselves against variance in expenditure. Yet this does not seem to be the case. Even if we *only* include plan choices where the variance is non-increasing, over 70% of enrollees could have chosen a lower

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<sup>11</sup> It appears that some plans may have offered low premiums in 2006 in order to entice consumers to choose their plan in the first year of the Part D program before raising their premiums in subsequent years. This behavior should not impact our analysis except insofar as there are large switching costs because consumers have the option to switch plans after each year, but one might still wonder to what extent the above results are driven by such plans. To assess this issue, we repeated the above analysis using the 2007 premiums for all plans and found that the average potential cost savings fell slightly from 30.9% to 25%.

cost plan, and the typical enrollee could have saved 23.3% of their Part D expenditures without raising their variance.<sup>12</sup>

The explanation for these facts is shown in Figure 2, which shows the choice set for individuals in California. The X axis in this graph is the mean of total costs for each plan, and the Y axis is the average standard deviation in costs (where the standard deviation is computed using the 1000 cell method, and the average is taken across individuals). In this graph, there is a clear “efficient frontier” of plans which dominate others in terms of both cost and variance. This graph masks considerable heterogeneity across individuals: different plans lie on the efficient frontier for different individuals, so the fact that a plan lies off the efficient frontier in this graph does not imply that it is suboptimal for each individual. Nonetheless, most of the plans are well off the efficient frontier, meaning individuals could have either lowered their mean costs or their variance by picking a different plan.

As we will document below, one reason for the large amount of choice off the efficient frontier is that individuals consider plan characteristics in making their choices – but not how those plan characteristics matter for themselves. This is perhaps best illustrated by a simple examination of the decision to choose a plan with donut hole coverage. Figure 3 shows the probability of choosing donut hole coverage, and the financial implications of doing so, sorted by 2006 spending percentiles; the results are once again similar for other measures such as 2005 actual spending or 2006 predicted spending. The bottom line shows the percent of the population at each percentile choosing donut hole coverage; the top line shows the average savings for individuals in

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<sup>12</sup> The fact that this number is smaller than the 30.9% number is because we are searching for cost savings over a small set of plans, not because individuals are especially sensitive to risk, a point we document further below.

that quantile from switching from the lowest cost plan in their region which offers donut hole coverage to the lowest cost plan that does not.

The plans which offer donut hole coverage actually have slightly inferior coinsurances relative to the lowest cost non-donut hole plans in the initial coverage range, and so the cost of donut hole coverage is rising with expenditures until the point when individuals become likely to enter the donut hole.

The results here are striking: the percentage choosing donut hole coverage is virtually flat throughout the spending distribution at around 10%. Even if individuals are willing to pay extra in mean costs for the protection provided by donut hole coverage, it is hard to rationalize the fact that the same proportion of individuals in the 10<sup>th</sup> and 85<sup>th</sup> percentile of the spending distribution choose donut hole coverage.

#### **Part IV: Base Model of Part D Plan Choice**

In this section, we extend the efficient frontier analysis presented above by considering several discrete choice models. These models serve three general purposes in our setting. First, they allow us to control for additional plan characteristics such as plan quality. Second, they allow us to understand more precisely how preferences combine with choice set characteristics so we can forecast how individuals might choose in counterfactual choice environments. Third, they allow us to quantify the welfare consequences of choices.

We begin by specifying a CARA utility model with a normally distributed cost distribution:

$$U(C) = -\exp(-\gamma(W - C)) \text{ where } C \sim N(\mu, \sigma^2) \quad (1)$$

In this case, indirect utility is given by:

$$u(\mu, \sigma^2) = EU(C) = -\alpha \exp\left(\gamma\mu + \frac{1}{2}\gamma^2\sigma^2\right) \quad (2)$$

where  $\alpha = -\exp(-\gamma W)$  is a constant. A first-order Taylor expansion about the point  $(\mu^i, \sigma^{2i})$  yields:

$$u(\mu, \sigma^2) \approx u(\mu^i, \sigma^{2i}) - \alpha\gamma u(\mu^i, \sigma^{2i})(\mu - \mu^i) - \frac{1}{2}\alpha\gamma^2 u(\mu^i, \sigma^{2i})(\sigma^2 - \sigma^{2i}) \quad (3)$$

We can write total costs as  $C = \pi + OOP$  and since  $\pi$  is known for any given plan,  $Var(C) = Var(OOP) = \sigma^2$  and  $\mu \equiv E(C) = \pi + E(OOP) = \pi + \mu^o$ . Adding an error term (and dropping constant terms) we can rewrite equation **Error! Reference source not found.** as:

$$u = -\alpha\gamma u(\mu^i, \sigma^{2i})(\pi + \mu^o) - \frac{1}{2}\alpha\gamma^2 u(\mu^i, \sigma^{2i})\sigma^2 + \epsilon \quad (4)$$

This maps into a conditional logit model of plan choice where the utility of individual  $i$  from choosing plan  $j$  is given by:

$$u_{ij} = \pi_j\beta_0 + \mu_{ij}\beta_1 + \sigma_{ij}^2\beta_2 + x_j\gamma + q_{b(j)}\delta + \epsilon_{ij} \quad (5)$$

with  $\beta_0 = \beta_1 = -\alpha\gamma u(\mu^i, \sigma^{2i})$  and  $\beta_2 = -\frac{1}{2}\alpha\gamma^2 u(\mu^i, \sigma^{2i})$ . In this equation

$x$  represents any financial plan characteristics which impact choice,  $q_{b(j)}$  represents plan quality ratings and other non-financial aspects of plans (which vary only across brands), and  $\epsilon_{ij}$  are i.i.d. type I extreme value random variables.

In this expression,  $\gamma = \frac{2\beta_2}{\beta_1}$  allows us to map the ratio of the coefficients on the variance of costs and the coefficient on the mean of costs into the coefficient of absolute risk aversion. This assumes that wealth is constant across all states of the world: the only risk facing individuals is uncertainty about the distribution of out of pocket costs. The

same expression would hold if we added idiosyncratic risk that was uncorrelated with prescription drug expenditures, but it is not implausible that there would be correlated risks: in states of the world where prescription drug expenditures are higher, other medical expenditures are higher as well. Such correlated risks would tend to bias upwards our already low estimates of risk aversion.

We include in our model several financial plan characteristics beyond premiums, out of pocket costs, and the variance of out pocket costs. These are: the deductible of the plan; a dummy for whether the plan covers all donut hole expenditures; a dummy for whether the plan covers generic expenditures in the donut hole only; and a cost-sharing index. The cost sharing index is calculated for each plan as the average percentage of expenditures covered by the plan between the deductible and the donut hole. This variable differs from expected out of pocket costs in that it has the same value for everyone in the sample for each plan, and because it is not directly impacted by whether plans have deductibles or donut hole coverage. We also include two measures of plan quality: the share of the top 100 drugs used by elders that is included in the plan's formulary and a quality index. The quality index is computed by CMS on a 1-5 scale by aggregating consumer ratings at the brand level collected along 17 dimensions which are categorized as "Customer Service," "Drug Pricing Information" (availability / rate of price changes), and "Using Your Plan to Get Your Prescription Filled".

Identification is a natural concern in this context. All of the plan characteristics included in our model may be endogenous due to unobserved demand factors, and they may be biased by correlation with unobserved plan characteristics. To address this concern, we observe and include in our model all of the publicly available information

that might be used by individuals to make their choices. We also consider models where we control for a full set of brand dummies, as well as a full set of interactions of state dummies with brand dummies. When we include brand dummies, the coefficient on the quality index (which is measured at the brand level) is no longer separately identified although it can be recovered by a GLS regression of these dummies on the quality variable. When brand-state dummies are included, coefficients on plan characteristics such as the premium, deductible and donut hole coverage are identified by the variation across plans offered by the same brands in a given state.<sup>13</sup>

Even with these fixed effects, it is possible that premiums are endogenous because they are set based on brand-state specific assessments of demand conditions. If premiums are higher in regions where insurers anticipate more demand for their particular plan (relative to other plans offered by the same insurer), our estimate of the coefficient on premiums will be biased towards zero since individuals will appear to be less averse to higher premiums. To the extent that these factors make high premiums appear less undesirable than they actually are, our conclusion that premiums are overweighted relative to out of pocket costs would be strengthened, as would our estimates of the welfare loss due to consumer mistakes.<sup>14</sup>

### Restrictions on Preferences

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<sup>13</sup> For instance, in many states Humana offers a Standard plan with lower premiums but limited coverage, an Enhanced plan with higher premiums but no deductible, and a Complete Plan which offers superior cost sharing and full donut hole coverage at much higher premiums.

<sup>14</sup> We did attempt estimating the models reported below using two instruments using the control function approach: these were the average premium for a given plan in all states where the plan is offered (designed to avert local demand shocks) and a “marginal cost” instrument constructed using the average covered expenditures for individuals enrolled in the plan. In both cases, the magnitude of the coefficient on premiums increased in the IV models. We are not confident that the exclusion restriction is satisfied for either of these instruments, so we continue to estimate the model without an instrument below.



The model laid out above suggests three natural restrictions on preferences which extend the efficient frontier concept to the discrete choice setting.

*Restriction 1:  $\beta_0 = \beta_1$*

This restriction states that the coefficient on premiums should equal the coefficient on expected out of pocket costs. Controlling for the risk characteristics of plans, individuals should be willing to pay exactly one dollar in additional premiums for coverage which reduces expected out of pocket costs by one dollar. If this restriction fails to hold, individuals are not choosing on the efficient frontier: they could switch to alternative plans with comparable risk characteristics but lower total costs.

*Restriction 2:  $\gamma = \mathbf{0}$*

This restriction states that financial plan characteristics other than premiums, expected out of pocket costs and the variance of out of pocket costs do not impact choices. Individuals should not care about deductibles, donut hole coverage or copays *per se*; they should only care about these factors to the extent that they impact the distribution of out of pocket costs. Once we control for this distribution, these factors should be redundant.

*Restriction 3:  $\beta_2 \leq \mathbf{0}$*

This restriction states that individuals should be risk averse.

While these restrictions follow naturally from utility maximization with full information and standard preferences, the model from which they are derived makes several important functional form assumptions: we assume that the distribution of out of pocket costs can be summarized by its mean and variance, that indirect utility is a linear function of this mean and variance, and that the errors are i.i.d. type I extreme value. In

Appendix A, we show that the restrictions assumed in the previous section still hold even when these functional forms assumptions are weakened.<sup>15</sup> Of course, it is always possible to write down preferences that would violate the above restrictions, but these restrictions are generally compatible with commonly used expected utility functions given the observed cost distributions.

## **Part V: Results**

### Base Results

Table 1 reports the results from several conditional logit models. Model (1) includes only the premium, realized out of pocket costs and the variance of out of pocket costs. As noted in the discussion of the cost variables, expected out of pocket costs – meaning the individual’s expectation of out of pocket costs at the time of plan choice – is not directly observed, so we use realized costs as a proxy for expected out of pocket costs. This proxy has noise (where “noise” includes the component of realized costs unknown to the individual at the time when the choice is made) and so its coefficient is biased downwards. We address this problem at length in the next section and show that it does not much impact our conclusions.

The cost variables – premiums and out of pocket costs – are measured in hundreds of dollars. Model (1) therefore shows that a \$100 increase in premiums leads to a 32% reduction in the probability that a given plan is chosen, implying an average elasticity of -

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<sup>15</sup> In particular, we simulate choices using the actual distribution of costs and several commonly used utility functions (CRRA, CARA) with varying levels of risk aversion. In some cases, the restrictions do not hold exactly, but the violations are much smaller in magnitude than we observe when we estimate the model using actual choices.

-0.75.<sup>16</sup> There are two ways to interpret the remaining coefficients. First, we can divide by the premium coefficient in order to compute the willingness to pay in dollars for a one unit increase in the characteristic. Second, the coefficient itself can be interpreted as the percentage increase in the probability that a plan is chosen from a one unit increase in the characteristic provided that probability is small (as it is for most plans).

Two points about the model (1) results are noteworthy. First, the coefficient on out of pocket costs is only about ½ as large as the coefficient on premiums, violating Restriction 1. Second, the coefficient on the variance term is negative and significant, but extremely small, implying risk aversion substantially less than we obtained in the simulations with CRRA = 1.

Model (2) adds additional covariates to control for deductibles, donut hole coverage, average cost sharing, formulary coverage and plan quality. Many of these covariates enter the model with significant coefficients. When we add plan characteristics, the coefficient on premiums increases suggesting that it was initially biased downward due to omitted variable bias. The coefficient on the variance term drops even further once we add a control for the # of the most popular 100 drugs which are included in the plan's formulary. This suggests that while individuals prefer plans which cover more drugs, they do not have sufficient foresight to choose plans which cover drugs which they (or at least people in their cell) might need in the future but are not already taking.

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<sup>16</sup> The implied elasticity varies across plans based on premium level and market share. The “32%” number given in the text is derived from the equation  $\frac{\partial \ln p_{ij}}{\partial \ln x_{ij}} = (1 - p_{ij})\beta$ . Thus, for  $p_{ij} \approx 0$  which holds for a large number of plans, we can interpret  $\beta$  as the percentage change in  $p_{ij}$  associated with a one unit change in  $x_{ij}$ .

Models (3) and (4) add brand dummies and brand-state dummies respectively. The coefficient on premiums actually shrinks once we include brand-dummies, but the effects of the premium remain large; a \$100 increase in annual premiums leads to a 50% reduction in the probability that a plan is chosen, corresponding to an average elasticity of -1.17. The coefficient on out of pocket costs has similar magnitude across all of the models, which reflects the fact that it is identified based on individual variation. In columns (3) and (4) the coefficient on the premium is more than five times as large as the coefficient on out of pocket costs.

The coefficients on plan characteristics are also very large in all specifications. Controlling for the out of pocket cost consequences, model (4) – which has the smallest plan characteristics - suggests that individuals are willing to pay over \$300 for full donut hole coverage, \$50 for generic donut hole coverage, about \$80 to go from a deductible of 250 to a deductible of 0, about \$80 to go from the plan with the least cost sharing (25%) to the plan with the most cost sharing (65%), and \$12 for each of the top 100 drugs which appear on the formulary. These numbers are not enormous, but they are an order of magnitude larger than the results in the simulations, and have non-trivial consequences for the welfare evaluation of plan choice as we investigate in the welfare analysis section.

Thus, this formal modeling of choice reveals a violation of all three of the preference restrictions we laid out above. The coefficient on premium is an order of magnitude larger than the coefficient on out of pocket expenditures; generalized plan characteristics enter the model highly significantly, even conditional on individual out of pocket risk; and individuals are not willing to pay more for plans with lower variance in expected spending.

One potential shortcoming of our last conclusion, however, is the reliability of our variance measure. We compute the variance by assessing the variability in out-of-pocket spending across a sample of similar individuals; we have tried several alternative specifications of risk preferences (such as including quantiles in the right-tail of the distribution of costs) and this does not appear to alter our results. We have also constructed alternative “cells” for a subset of the sample which also take into account information on the particular drugs each individual uses, and have found that our current method captures more than 90% of the variation in the variance term across plans. It is not a foregone conclusion that the coefficient on our variance variable would be zero even if elders do not explicitly consider the cost of alternative plans under a range of hypothetical outcomes: if patients with a greater risk of getting sicker in the following year also chose plans with more coverage, we might expect this to show up in the variance variable even after we control for the average value of plan characteristics. The result appears to buttress our finding that individuals are insensitive to the individualized consequences of plan choice. Nevertheless, we place less weight on this last choice inconsistency because of concerns about the appropriate specification and measurement of risk in our setting some of which are discussed further in the robustness section.

### Robustness

While our unique data set makes this analysis possible, the data do have a number of shortcomings. In this section we show the robustness of our basic conclusions to efforts to address these shortcomings.

First, we are able to match only 50.5% of our sample of 1.53 million individuals to Part D plans, partly because we use very stringent criteria designed to minimize false

matches. The cost of such an approach is that our matched sample may not be representative of the full sample of 1.53 million; in particular, the individuals in our sample have more claims because that makes it easier to match them to a plan. We therefore consider a less stringent matching strategy; in this less stringent match, we consider a copay as matched for a given claim if the appropriate copay appears *anywhere* on the claims formulary, even if the copay listed for drugs in that particular tier and days supply is not correct. We also accept matches if just 50% of overall claims are matched rather than requiring that this threshold be exceeded in every month after the first Part D claim is observed. Using this strategy, we are able to match 1.28 million of our 1.53 million individuals, or 84%.

The first column of Table 2 shows the robustness of our findings to this alternative measure. None of our main conclusions are altered. Our coefficients of interest are somewhat smaller than in the original sample, which may be because of noise introduced by being less stringent in our willingness to accept matches, but the fundamental choice inconsistencies persist.

Second, a limitation of our approach is that we exclude individuals with low numbers of claims, since our matching algorithm requires enough claims to identify the plan copayment structure. This clearly leads to bias to our variance measure which is constructed by selecting matched individuals in the same cell; this is yet another reason why we have less confidence in the variance results than in our results for other forms of choice inconsistency. But there is no reason why this should lend a particular bias to our other results; if anything, we might think that failing to correctly specify the variance would make low OOP cost plans seem more desirable (since they also have lower

variance), thus biasing upwards the coefficient on OOP costs. If this were the case, our results would be too conservative in reporting mistakes.

The exclusion of individuals with a small number of claims also raises selection issues, since these individuals may make better choices or have systematically different price elasticities. To address this problem, we have reestimated our model including additional individuals who we have excluded thus far. First, assuming some serial correlation in claims behavior, we can mimic the inclusion of low claims individuals in 2006 by including those with no claims in 2005 (we have excluded them thus far to allow for the creation of our variance measure and the rational expectations measure used below). We reran our base-case discrete choice model using a random sample drawn from the larger sample including individuals with 0 claims in 2005. In our original sample, the variance variable was constructed by assigning each individual to one of one thousand cells based on 2005 claims. Because all of these individuals are identical in 2005, we assigned all of them to a single cell, and computed the variance by running 200 randomly chosen individuals in that cell through every plan. The results of this analysis are shown in column 2, and they do not differ much from our original results.

In column (3), we extend this analysis further by restricting the analysis to those who have zero claims in 2005 and fewer than 12 claims in 2006; this is the closest we can get to the zero claim sample in 2006 while still matching plans. The results are once again quite similar.

Third, we include in our analysis both unique matches and multiple matches, imputing the latter based on market shares. This adds a degree of noise to our estimation that could plausibly bias the results. We address this issue in two ways in Table 2. First,

we reestimate the model including only those multiple matches where we can identify the plan with 95% certainty based on the relative enrollment given by CMS for the matched plans in the patient's state (e.g. one of the plans has at least 19 times the enrollment of the other matched plans combined). Including unique matches, this was 75% of the original sample. Going further, in column 5, we reestimate the model only with those observations for which we can make a unique match. Neither of these changes alters any of our main conclusions

Fourth, we do not know with certainty which individuals in our sample are dual eligibles. If we mistakenly include dual eligibles in our sample, we will measure them as having a lot of variation in OOP costs when they really have none, so we wrongly interpret them as insensitive to OOP costs. We are fairly confident, however, that we are excluding dual eligibles from our sample because they have such a limited range of possible copayments. For example, for 90% of the observations we use, more than one-quarter of their claims have copayments which are inconsistent with being a dual eligible (e.g. more than \$5). To further ensure that problems identifying dual eligibles were not biasing our results, we have reestimated our model only on individuals where at least 50% of their claims are inconsistent with the copayment rates for duals. As we show in column 6 of Table 2, this has little impact on our results.

Finally, in column 7, we show the impacts of decomposing further the aggregate quality index that we have used in our work thus far. We decompose the index into its three primary components. Doing so, we find that choice is positively associated with each of these quality components. The most important characteristic of quality to



consumers appears to be the ease in filling prescriptions. Most importantly, decomposing the quality measure has no impact on our results.

#### Misspecification of Out of Pocket Costs Due to Private Information

In the previous section, we presented results from a conditional logit model of plan choice and identified three apparent irregularities in choices. Our interpretation is that these results reflect consumer errors – plan characteristics are more salient than are their implications for the distribution of out of pocket costs, and individuals are unable to compute the individualized risk characteristics of the alternative plans. In this section we consider an alternative explanation: we have misspecified out of pocket costs because we have failed to appropriately model the information available to individuals at the time when they make their plan choice.

Thus far we have measured out of pocket costs using the realized cost measure constructed from 2006 claims. An alternative measure that we consider in this section we label our “rational expectations” measure. Recall that to create our variance measure we classified all individuals into 1000 cells defined by deciles of 2005 total spending, generic prescriptions and branded prescriptions, and ran the 2006 claims of 200 persons in each cell through the cost calculator for that plan. This procedure generates a distribution of costs for each patient and plan. Our rational expectations measure is defined as the mean of this distribution. Under the strong assumptions discussed above (CARA utility and a normal distribution of costs), the mean and the variance would completely summarize the impact of the cost distribution on utility; our simulations in the

Appendix A show that they summarize this distribution well anyway even if these assumptions are relaxed.

It is useful to compare this rational expectations measure to the perfect foresight/realized costs measure we have been using. The latter measure is “too broad” in the sense that it includes information not available to individuals at the time when they choose (provided that is, that they do not know exactly what their drug needs and drug prices will be for the coming year). The former measure is “too narrow” in the sense that individuals may have private information at the time they choose beyond what can be inferred from their 2005 costs. If a patient learns they have cancer just prior to choosing their 2006 plan, they would correctly forecast that their drug needs would likely exceed the average of those with similar 2005 spending.

We address these concerns by developing a model with which we can identify the information available to consumers at the time when they choose. The intuition behind this model is that we can determine if individuals know more than we can predict given just their 2005 spending by evaluating whether their plan choices are responsive to the component of 2006 spending which is not known in 2005.

The formal derivation of this model is presented in Appendix B. In summary, we augment our model in two ways. The first is to include a normally distributed term which captures the degree of private information: the difference between actual out of pocket spending in 2006 and what we would have predicted for 2006 based on our rational expectations model. If we were estimating a linear model, this would be comparable to estimating our model by instrumental variables, where we instrument the perfect foresight level of costs with our rational expectations cost measure, which is

independent of private information. In our non-linear setting, the comparable correction is to include this noise term, which essentially amounts to estimating a random coefficients model with one extra parameter to identify the degree of private information. Second, the measured variance from the 1000 cell exercise overstates the true variance in costs because some of this variation represents variation in realized costs which is unpredictable based on 2005 costs but is known to the individual at the time when they choose. We develop a correction for the variance based on the estimated degree of private information.

Table 3 reports the results from estimating this model. For computational reasons, we estimate this model on a much smaller sample by randomly selecting 15,000 patients from our earlier sample. Column (1) reports our earlier results, column (2) reports the earlier specification on the new sample, and column (3) the results from adding the term for private information and correcting the variance. The model is estimated using the Laplace approximation developed in Hausman-Harding (2007) with bootstrapped standard errors, including controls for the various plan characteristics.

The results in Table 3 suggest that there is substantial private information: individual choices take into account about 60% of the variation in out of pocket costs which cannot be predicted given their cell. The results also imply that our earlier finding that the coefficient on realized costs is smaller than the coefficient on premiums is robust to any measurement error generated from the fact that individuals do not know realized costs at the time when they choose.<sup>17</sup> Moreover, financial plan characteristics such as the

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<sup>17</sup> In other words, in a linear context, instrumenting realized costs for 2006 by predicted costs based on 2005 characteristics does not much change the coefficient on out of pocket costs, indicating little bias from measurement error in our out of pocket cost coefficient.

donut hole and deductible continue to enter highly significantly in this model. Therefore, two of the major choice inconsistencies persist even when we model private information.

This model implies, however, that individuals know much of what their costs will be to each plan in their choice set in the coming year so there is little insurance motive. Under this interpretation, the variance in out of pocket costs is small for all plans because there is little uncertainty. This means that any measured response to the variance term would imply high levels of risk aversion, and that the standard errors in our estimates of risk aversion are much larger than we concluded in the model ignoring private information. The risk index in these models (obtained by dividing the variance coefficient by the premium coefficient and multiplying by 200) is comparable to what we obtained in our Appendix B simulations for  $CRRA = 3$  with  $wealth = 17000$ .<sup>18</sup>

The bottom line from our models of private information is that our conclusions about the gap between the premium and out of pocket expenditure coefficients, and the powerful role for general plan financial characteristics in driving choice, are robust to a wide variety of specifications of out of pocket spending risk. Our conclusion about the low degree of estimated risk aversion, however, is more sensitive to the precise specification of the model.<sup>19</sup>

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<sup>18</sup> As we highlight in Abaluck and Gruber (2008), the results reported in Table 2 are also consistent with an alternative model of information where individuals are not using all available information, but rather are paying attention only to a part of their prescription drug expenditures. For that portion to which they are attentive, individuals are rationally weighting premiums and out of pocket costs in the same way in making their decision. Yet individuals do not respond to variation in out of pocket costs beyond that portion. Under this interpretation, we find that the degree of private information is smaller and the coefficient on the risk measure once again becomes very small.

<sup>19</sup> To further explore robustness here, we also consider an alternative measure of predicted out of pocket costs: predicting those costs based only on use of “regular drugs”. A regular drug is defined as any drug for which the individual consumed at least 90 days supply in 2005. In our new measure, we construct the OOP cost variable assuming that drug use in 2006 will consist only of regular drugs in 2005. Our results are very similar using this alternative measure.

## Part VI: Heterogeneity

The independence of irrelevant alternatives assumption that underlies the conditional logit model places strong restrictions on how elasticities vary across plans and will lead to inconsistent estimates if preferences are heterogeneous across the population. To address this concern, we assess the robustness of our model to heterogeneity driven by both observed and unobserved factors. We first note that our model already allows for a substantial amount of individual variation: we estimated the coefficients on individualized out of pocket cost parameters. Nonetheless, it may still be the case that preferences vary in ways not included in our model. In terms of observed heterogeneity, we have reestimated our model for a number of separate samples: by gender; by age; and by tercile of the 2005 prescription drug expenditure distribution. In every case, we find that our results are very similar across all samples. In particular, each of these samples illustrates the three choice inconsistencies documented thus far: the premium coefficient is many multiples of the out of pocket cost coefficient; financial plan characteristics enter significantly; and the estimated degree of risk aversion is very low.

We therefore turn to considering unobserved heterogeneity. We use the Laplace approximation developed by Hausman-Harding (2007) to estimate a model with normally distributed random coefficients on all included characteristics. Our goal here is primarily a robustness check: does accounting for heterogeneity change any of our qualitative conclusions?

Table 4 shows the results of this analysis. As before, column 1 is the original model on a small sample. Column 2 adds random coefficients on premium, perfect foresight OOP, variance and quality, while column 3 adds random coefficients on all

variables. Again, we see that the choice inconsistencies are present even after accounting for unobserved heterogeneity. Further, the magnitude of the coefficients estimated in the model without heterogeneity (which correspond to the mean of the random coefficients in this model) is not much affected. We do estimate significant heterogeneity in the coefficients on premium, quality, the deductible and the generic donut hole term; allowing for this heterogeneity turns out not to have a significant impact on the welfare results we report below.

We can also interpret the results in Table 4 as a test of the IIA assumption. To the extent that any of the coefficients are significant, this suggests that the IIA assumption does not hold exactly. Nonetheless, the fact that the magnitude of the coefficients does not change substantially once we allow for random coefficients suggests that this assumption is not altering our conclusions.

## **Part VII: Conclusions and Implications**

The new delivery mechanism for a public insurance benefit introduced by the Medicare Part D program is a radical departure from the traditional public insurance model – and an exciting opportunity to understand the role of choice in the delivery of public insurance. Using a unique data set we have provided the first evidence on the efficacy of the choices made by individuals under Part D. While individual choices are consistent with maximizing behavior such as preferring plans with lower premiums, lower out of pocket exposure and higher quality, they are inconsistent with the standard model in three important respects: individuals overweight out of pocket spending relative to premiums; they overweight plan characteristics beyond their own

circumstances; and they do not fully appreciate the risk-reducing aspects of plans for themselves.

One means of assessing the implications of these findings is to consider the partial equilibrium welfare gains that would occur were individuals making fully informed and rational decisions about plan choice (ignoring, for now, any supply side considerations or computation costs; these are discussed later). If individuals were fully informed, their choices would be given by the model estimated above but satisfying three additional restrictions: the coefficient on premiums is equal to that on expected out of pocket costs; financial plan characteristics other than premiums are excluded from the utility function once we control for the individual's expected out of pocket costs; and individuals exhibit risk aversion in their plan choice. We assume that the coefficient on premiums represents the marginal utility of a dollar if individuals were fully informed (this in turn determines the dollar value of quality variables and risk characteristics).

We define a normative utility function to include premiums and out of pocket costs (equally weighted), variance and quality, and value the latter characteristics in terms of dollars of premiums. We then ask: if individuals had chosen the plan which maximizes this normative utility function rather than the plan which they did in fact choose, by how much would utility be improved when assessed according to the normative utility function?<sup>20</sup> The answer in this model is about 27% of total costs – this is comparable to the 30.9% we found when we looked only at cost savings. The small difference is due to the fact that the lowest cost plans also have slightly lower quality

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<sup>20</sup> Appendix D of Abaluck and Gruber (2008) contains the formula used to make this calculation as well as a derivation.

ratings on average.<sup>21</sup> We can interpret the 27% number as telling us the scope of the potential partial equilibrium utility gains. If there were some intervention that would make individuals fully informed and fully rational, this is the amount by which their utility could be improved (in partial equilibrium).

This large effect suggests that policy makers consider reforms that realize some of these gains. Some possibilities include directly providing individualized information about costs (as in Kling 2008) or appointing surrogates such as doctors or pharmacists to play some role in plan choice. For example, as Gruber and Scott-Morton (2009) suggest, pharmacists could be reimbursed for helping seniors choose the best Part D plan for them.

A more difficult question is whether these findings justify actual restrictions in the choice set facing seniors. As discussed in Abaluck and Gruber (2008), if policy makers are able to restrict choice to the plans on the efficient frontier, there are sizeable welfare gains for seniors (in partial equilibrium). It is unclear, however, whether policy makers would be able to effectively distinguish such plans; simply restricting choice to a random subset of plans does not raise welfare.

A full modeling of policy implications must also consider the general equilibrium implications. For example, restricting the size of the choice set may lower competitive pressure on the supply side. Of course, there are possible reforms which would preserve the competitive nature of the bidding process while reducing the number of plans ultimately offered to consumers, such as first stage bidding across plans to offer one of a

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<sup>21</sup> The 27% number uses the measured coefficient on the variance of costs which is close to zero. We can alternatively impose a coefficient which corresponds to a coefficient of absolute risk aversion of .0003 (roughly  $CARA = 3$  with wealth of 17,000). In that case, the number rises to 27.6%. The difference is small because the lowest cost plans offer comparable risk protection to the plans which are actually chosen.



limited set of plan structures. Our results are also driven in part by the fact that the three lowest cost plans in each choice set are also among the best plans in terms of average utility all things considered. If we select three random plans in each choice set, we find welfare losses from restricting choice. On the demand side, this analysis assumes that the estimated choice process is fixed. We assume that individuals choose according to the same positive utility function regardless of the size of the choice set – any utility increases from smaller choice sets arise because there is less scope for error. If individuals are in fact better able to evaluate alternatives in a smaller choice set, then our analysis would understate the potential gains. Moreover, surveys indicate that elders spend an average of 3 hours selecting their Part D plan (Kling et. al. 2008), so the dollar value of the hours saved by dramatically simplifying the choice process may be non-trivial as well.

Our models do not distinguish between the case of boundedly rational consumers choosing plans they trust as a heuristic given the time-costs of fully evaluating choices, and the case where consumers simply err in underweighting out of pocket costs due to a lack of cognitive ability. While this distinction is important for evaluating the potential efficacy of providing consumers with additional information, it is less relevant to considering the welfare impact of altering the choice set: in either case, our estimates imply that consumers would be better off if there were less scope for choosing the wrong plan.

## References

- Akerberg, D. A. and M. Rysman. 2002. "Unobserved Product Differentiation in Discrete Choice Models: Estimating Price Elasticities and Welfare Effects" *NBER Working Paper*.
- Agarwal, S., J. C. Driscoll, X. Gabaix, and D. Laibson. 2007. *The Age of Reason: Financial Decisions Over the Lifecycle*. Vol. Pension Research Council; Wharton School: National Bureau of Economic Research Cambridge, Mass., USA.
- Berry, S. and A. Pakes. 2001. "Estimating the Pure Hedonic Discrete Choice Model" *manuscript, Department of Economics, Yale University*.
- Bertrand, M., D. Karlan, S. Mullainathan, E. Shafir, and J. Zinman. 2005. "What's Psychology Worth A Field Experiment in Consumer Credit Market" *Yale University Economic Growth Center Discussion Paper*, 918.
- Boatwright, P. and J. C. Nunes. 2001. "Reducing Assortment: An Attribute-Based Approach" *Journal of Marketing*, 65(3): 50-63.
- Chetty, Raj, Adam Looney and Kory Kroft, 2007. "Salience and Taxation: Theory and Evidence," NBER Working paper #13330, August 2007.
- Fratiglioni, L., D. De Ronchi, and H. A. Torres. 1999. "Worldwide Prevalence and Incidence of Dementia." *Drugs & aging*, 15(5): 365.
- Gruber, Jonathan and Fiona Scott-Morton. 2009. "Paying Pharmacists to Help Seniors Choose their Part D Plan," mimeo, Yale University.
- Harding, M. C. and J. Hausman. 2007. "Using a Laplace Approximation to Estimate the Random Coefficients Logit Model by Nonlinear Least Squares" *International Economic Review*, 48(4): 1311-1328.

Hastings, Justine and Lydia Tejada-Ashton, 2008. "Financial Literacy, Information and Demand Elasticity: Survey and Experimental Evidence from Mexico," NBER Working Paper #14538, December 2008.

Hausman, Jerry, Jason Abrevaya, and Fiona Scott-Morton. 1998. "Misclassification of the Dependent Variable in a Discrete-Response Setting" *Journal of Econometrics*, 87(2): 239-269.

Heiss, F., D. McFadden, and J. Winter. 2006. "Who Failed to Enroll in Medicare Part D, and Why? Early Results" *Health affairs*, 25(5): 344-354.

Heiss, F., D. L. McFadden, and J. K. Winter. 2007. "Mind the Gap! Consumer Perceptions and Choices of Medicare Part D Prescription Drug Plans" *NBER Working Paper*.

Irons, Ben and Cameron Hepburn. 2007. "Regret Theory and the Tyranny of Choice\*" *Economic Record*, 83(261): 191-203.

Iyengar, S. S., W. Jiang, and G. Huberman. 2004. "How Much Choice is Too Much? Contributions to 401 (k) Retirement Plans" *Pension Design and Structure: New Lessons from Behavioral Finance*: 83-96.

Iyengar, S. S. and E. Kamenica. 2006. "Choice Overload and Simplicity Seeking" *University of Chicago Graduate School of Business Working Paper*.

Iyengar, S. S. and M. R. Lepper. 2000. "When Choice is Demotivating: Can One Desire Too Much of a Good Thing?" *Journal of personality and social psychology*, 79(6): 995-1006.

Kamenica, E. 2008. "Contextual Inference in Markets: On the Informational Content of Product Lines" *American Economic Review*, 98(5): 2127-2128-2149.

Kling, J. R., S. Mullainathan, E. Shafir, L. Vermeulen, and M. V. Wrobel. 2008. "Misperception in Choosing Medicare Drug Plans" *Unpublished paper, June*.

Kuksov, D. and J. M. Villas-Boas. 2006. "When More Alternatives Lead to Less Choice" *Haas School of Business, University of California, Berkley, Mimeo.*

Lucarelli, C., J. Prince, and K. I. Simon. 2008. "Measuring Welfare and the Effects of Regulation in a Government-Created Market: The Case of Medicare Part D Plans" *NBER Working Paper.*

Petrin, A. 2002. "Quantifying the Benefits of New Products: The Case of the Minivan" *Journal of Political Economy*, 110(4): 705-729.

Salthouse, T. A. 1996. "The Processing-Speed Theory of Adult Age Differences in Cognition" *Psychological review*, 103(3): 403-428.

Figure 1:

Histogram of cost savings from switching to lowest cost plan

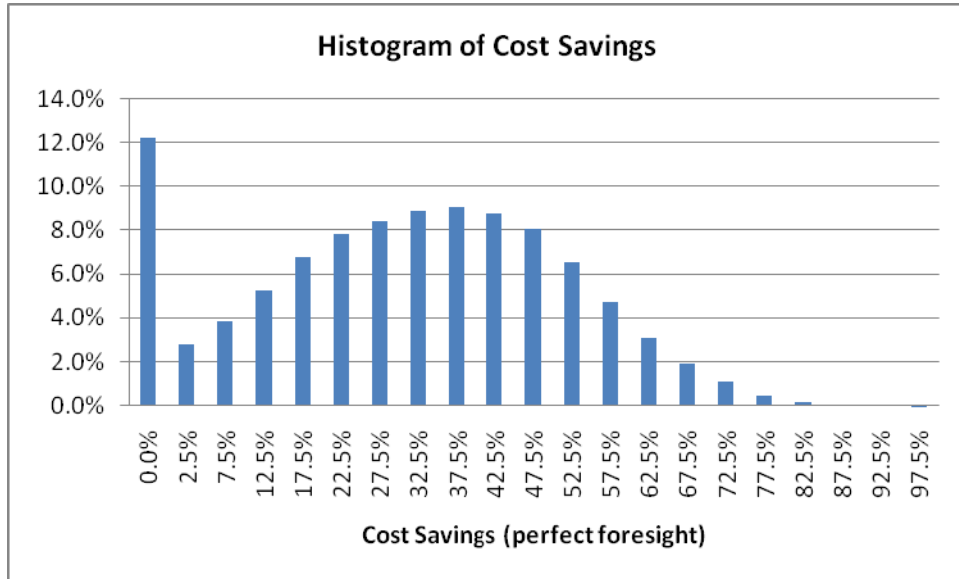


Figure 2:

Average mean and standard deviation for each PDP plan in CA

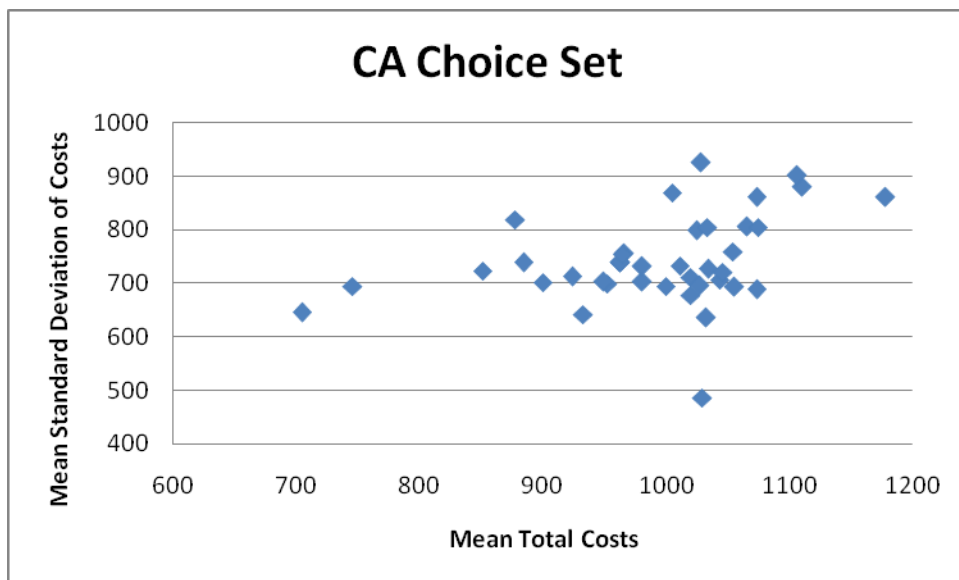
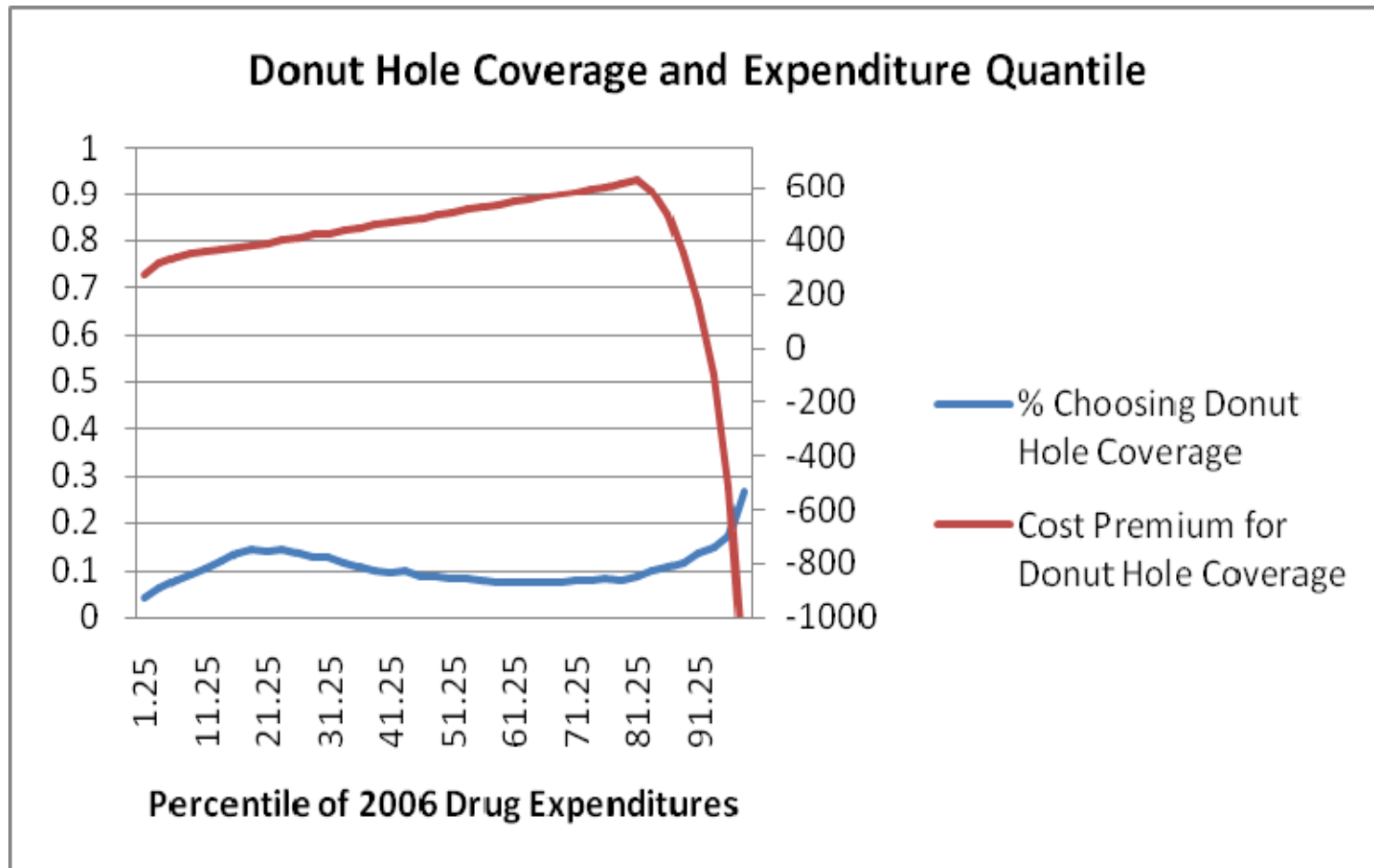


Figure 3:

### Percent Choosing Donut Hole Coverage and Added Cost by Expenditure Quantile



**Table 1: Conditional Logit Results**

	(1)	(2)	(3)	(4)
Premium	-.3208**	-.7663**	-.4990**	-.5218**
(hundreds)	(.0024)	(.0038)	(.0061)	(.0069)
OOP Costs (realized)	-.1861**	-.1172**	-.0961**	-.0967**
(hundreds)	(.0014)	(.0015)	(.0015)	(.0016)
Variance	-.0163**	-.0004	-.0006	-.0005
(times 10 <sup>6</sup> )	(.0023)	(.0007)	(.0007)	(.0007)
Deductible	x	-.2899**	-.1628**	-.1674**
(hundreds)		(.0049)	(.0067)	(.0072)
Donut Hole	x	3.023**	1.762**	1.865**
		(.0181)	(.0277)	(.0303)
Generic Coverage	x	.4203**	.3004**	.2700**
		(.0140)	(.0175)	(.0177)
Cost Sharing	x	3.282**	1.189**	1.057**
		(.0538)	(.0741)	(.0778)
# of top 100 on Form	x	.0937**	.0587**	.0644**
		(.0007)	(.0017)	(.0018)
Avg. Quality	x	.7398**	x	x
		(.0039)		
Brand Dummies	NO	NO	YES	NO
Brand-State Dummies	NO	NO	NO	YES
Risk Index	10	0	0	0
# of patients	95742	95742	95742	95742
# of plans	702	702	702	702
# of states	47	47	47	47
# of brands	36	36	36	36

**Notes:** Table shows conditional logit results from estimating the model given in equation (6) by maximum likelihood. Each column shows coefficients from a single regression. The coefficients reported are the parameters of the utility function, not marginal effects. Standard errors are in parentheses. \* indicates significance at the 5% level and \*\* indicates significance at the 1% level. The first column includes only premium, realized out of pocket cost and the variance measure. The second column adds controls for the indicated plan characteristics, the third column adds brand fixed effects and the fourth column adds brand-state fixed effects. Premiums, out of pocket cost and deductibles are in hundreds of dollars and the variance term is in millions. The cost sharing variable is computed as the average value of covered expenditures divided by total drug expenditures for individuals in the choice set. The average quality variable is a normalized version of the “average rating” index provided by CMS. The risk index is twice the coefficient on the variance divided by the coefficient on premiums scaled by 100. In the model in the text, this value equals one million times the coefficient of absolute risk aversion.

**Table 2: Robustness Checks**

	(1)	(2)	(3)	(4)	(5)	(6)	(7)
Premium	-.4099**	-.5717**	-.5099**	-.4935**	-.5517**	-.5220**	-.7422**
(hundreds)	(.0070)	(.0076)	(.0074)	(.0072)	(.0078)	(.0070)	(.0043)
OOP Costs (realized)	-.0508**	-.0808**	-.0846**	-.0977**	-.0986**	-.0944**	-.1100**
(hundreds)	(.0016)	(.0018)	(.0018)	(.0016)	(.0016)	(.0015)	(.0015)
Variance	-.0009	-.0067**	-.0011	-.0003	.0002	-.0007	-.0004
(times 10^6)	(.0010)	(.0029)	(.0014)	(.0007)	(.0012)	(.0008)	(.0008)
Deductible	-.0456**	-.2680**	-.2179**	.4378**	.4876**	-.1723**	-.2730**
(hundreds)	(.0072)	(.0070)	(.0068)	(.0095)	(.0100)	(.0072)	(.0051)
Donut Hole	1.224**	2.023**	1.907**	2.872**	3.956**	1.837**	2.935**
	(.0302)	(.0299)	(.0296)	(.0346)	(.0380)	(.0304)	(.0204)
Generic Coverage	-.0241	.1168**	.1345**	.7570**	.8362**	.2597**	.4206**
	(.0158)	(.0173)	(.0296)	(.0233)	(.0265)	(.0178)	(.0141)
Full Cost Sharing	.9973**	2.129**	1.319**	1.357**	-.0986	1.076**	3.633**
	(.1313)	(.1316)	(.1295)	(.0838)	(.0897)	(.0781)	(.0555)
# of top 100 on Form	.0737**	.0664**	.0599**	.1173**	.1126**	.0654**	.0952**
	(.0013)	(.0015)	(.0014)	(.0023)	(.0022)	(.0018)	(.0007)
Customer Service	x	x	x	x	x	x	.1644**
							(.0066)
Prescription Filling	x	x	x	x	x	x	.5666**
							(.0037)
Pricing Avail./Changes	x	x	x	x	x	x	.4142**
							(.0054)
Missing Quality Dummies	NO	NO	NO	NO	NO	NO	YES
Brand Dummies	NO	NO	NO	NO	NO	NO	NO
Brand-State Dummies	YES	YES	YES	YES	YES	YES	NO
Risk Index	0	0	0	0	0	0	0
# of patients	99999	99981	99981	99988	99999	99994	95742
# of plans	888	861	861	702	702	702	702
# of states	49	49	49	47	47	47	47
# of brands	48	42	42	36	36	36	36

**Notes:** Table shows conditional logit results from estimating the model given in equation (6) by maximum likelihood on different subsamples to check robustness. Each column shows coefficients from a single regression. The coefficients reported are the parameters of the utility function, not marginal effects. Standard errors are in parentheses. \* indicates significance at the 5% level and \*\* indicates significance at the 1% level. Premiums, out of pocket cost and deductibles are in hundreds of dollars and the variance term is in millions. The cost sharing variable is computed as the average value of covered expenditures divided by total drug expenditures for individuals in the choice set. The first column estimates the model on a random sample of 100,000 patients selected from the sample of individuals who were matched



to a PDP plan in the “Lax match” discussed in the text. The second column estimates the model on the original sample used in Table 1 plus individuals with zero claims in 2005. The third column uses the same sample as the second column, but dropping individuals with zero claims in 2005 and more than 12 claims in 2006. The fourth column includes only unique matches and multiple matches which could be assigned with 95% certainty. The fifth column includes only unique matches. The sixth column uses the original sample but restricting to individuals for which more than 50% of their claims were non-dual. The seventh column disaggregates the quality variable. Note that the seventh column also does not include brand or brand-state dummies since these are collinear with the quality variables. The risk index is twice the coefficient on the variance divided by the coefficient on premiums scaled by 100. In the model in the text, this value equals one million times the coefficient of absolute risk aversion.

**Table 3: Results with Private Information**

	Final Sample	Restricted Sample	Private Info
% Private Information			.5818** (.0618)
Premium (hundreds)	-.7383** (.0038)	-.7156** (.0094)	-.7489** (.0132)
OOP Costs (realized) (hundreds)	-.1169** (.0016)	-.1040** (.0039)	-.1687** (.0094)
Variance (times 10 <sup>6</sup> )	-0.0026 (.0014)	-.1103* (.0517)	-.8574** (.2947)
Deductible (hundreds)	-.2677** (.0014)	-.3079** (.1257)	-.2767** (.0137)
Donut Hole	2.823** (.0181)	2.805** (.0490)	2.870** (.0478)
Generic Coverage	.3066** (.0143)	.4743** (.0341)	.4784** (.0347)
Full Cost Sharing	2.990** (.0546)	3.391** (.1417)	2.829** (.1743)
# of top 100 on Form	.0939** (.0007)	.0995** (.0019)	.1005** (.0021)
Avg. Quality	.7167** (.0039)	.7418** (.0098)	.7512** (.0095)
Brand Dummies	NO	NO	NO
Brand-State Dummies	NO	NO	NO
Risk Index	1	31	229
# of patients	95742	15001	15001
# of plans	702	702	702
# of states	47	47	47
# of brands	36	36	36

**Notes:** Table compares conditional logit results with results from estimating the random coefficients model given in equations (11) and (14) using the Laplace approximation to the likelihood function developed by Hausman and Harding (2007) with bootstrapped standard errors. Each column shows coefficients from a single regression. The coefficients reported are the parameters of the utility function, not marginal effects. Standard errors are in parentheses. \* indicates significance at the 5% level and \*\* indicates significance at the 1% level. The first column is identical to the second column of Table 1. The second column estimates the same model on a random subsample of 15,000 and the third column estimates the random coefficients model on this same subsample. Variable definitions are identical to Table 1. The “Percent Private Information” field corresponds to the variable  $\beta_{free}$  in the model in the text.

**Table 4: Random Coefficients Results**

	(1)	(2)	(3)
Premium	-.7156**	-.7677**	-.7354**
(hundreds)	(.0094)	(.0111)	(.0841)
Std. Deviation of Premium	x	.2940**	.2659**
		(.0560)	(.0330)
OOP Costs (realized)	-.1040**	-.1091**	-.1193**
(hundreds)	(.0039)	(.0052)	(.0171)
Std. Deviation of OOP Costs	x	.0001	.0226
		(.0003)	(.0506)
Variance	-.1103*	-.1486	-.0866
(times 10^6)	(.0517)	(.0926)	(.1237)
Std. Deviation of Variance	x	.2035**	.2603
		(.0685)	(.1769)
Deductible	-.3079**	-.2524**	-.2354
(hundreds)	(.1257)	(.0107)	(.1903)
Std. Deviation of Deductible	x	x	.2922*
			(.1452)
Donut Hole	2.805**	2.775**	2.523**
	(.0490)	(.0630)	(.3538)
Std. Deviation of Donut Hole	x	x	.8078
			(.5997)
Generic Coverage	.4743**	.4845**	-.0037
	(.0341)	(.0427)	(.2320)
Std. Deviation of Generic Coverage	x		1.106*
			(.5108)
Full Cost Sharing	3.391**	2.083**	1.829
	(.1417)	(.1852)	(1.304)
Std. Deviation of Cost Share	x		.1290
			(.4828)
# of top 100 on Form	.0995**	.0992**	.1405**
	(.0019)	(.0023)	(.0078)
Standard Deviation of top 100	x		.1071
			(.0790)
Avg. Quality	.7418**	.7729**	.7622**
	(.0098)	(.0090)	(.0358)
Standard Deviation of Quality	x	.3753**	.3503
		(.0146)	(.2182)
Brand Dummies	NO	NO	NO

Brand-State Dummies	NO	NO	NO
Risk Index	124	124	124
# of patients	15001	15001	15001
# of plans	702	702	702
# of states	47	47	47
# of brands	36	36	36

Notes: Table shows results from estimating the random coefficients model discussed in the heterogeneity section, estimated using the Laplace approximation developed in Hausman-Harding (2007) with bootstrapped standard errors. This model is identical to the model in equation (6), adding the normally distributed noise term (which is a function of  $\epsilon_{ij} - \mu_{ij}$ ) and the variance adjustment. Each column shows coefficients from a single regression. The coefficients reported are the parameters of the utility function, not marginal effects. Standard errors are in parentheses. \* indicates significance at the 5% level and \*\* indicates significance at the 1% level. In columns (2) and (3), each set of four rows reports the mean and standard deviation of random coefficient (and their standard errors). The first column estimates the conditional logit model on the subsample of 15000 (and is identical to the second column of Table 2). The second column adds random coefficients on financial characteristics and quality and the third column adds random coefficients on all variables. Variable definitions are otherwise identical to Table 1.

### Appendix A: A Simulation Exercise

In this section we demonstrate that the choice restrictions we test in our conditional logit model would be satisfied by a broad range of generalized utility functions. We start by considering CARA and CRRA utility functions with a range of values for risk aversion. We then take the cost distributions generated from the Part D data for each plan and simulate individuals' choices using the assumed utility function. Finally, we estimate the conditional logit model using these simulated choices and check whether the restrictions considered above hold. We add a small amount of noise to each observation so that the coefficients are identified at small levels of risk aversion.<sup>22</sup> The results of this exercise are reported in Appendix Table 1.

The CRRA utility function is evaluated at wealth \$17,000, the median financial wealth of those age 65-74 in 2004 (EBRI, 2005). This is a conservative assumption which will tend to increase the curvature – and thus the degree of misspecification (it is especially conservative given that our analysis excludes individuals eligible for low-income subsidies). The absolute magnitude of the coefficients is determined by the amount of added noise (since this is the only omitted factor). A more informative measure is the size of each coefficient relative to the coefficient on premiums: this measure gives the dollar value of a one unit change in the included variable.

Regarding the first restriction, we see that, provided risk aversion is not too large (CRRA < 3, CARA < .0001), the coefficient on premiums equals the coefficient on OOP costs, and the two are very comparable in magnitude even at more extreme levels of risk aversion. The second restriction appears to hold roughly over the same range: the plan characteristics are insignificant controlling for the mean and variance of out of pocket

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<sup>22</sup> The standard deviation of the noise is 1/20<sup>th</sup> of the interquartile range of utility.

costs provided  $CRRA < 3$  and  $CARA < .003$ . Even in the cases when they are significant, they are small in magnitude relative to premiums. Dividing the coefficient on each variable by the coefficient on premiums gives the dollar value of a 1 unit increase in the variable. In the  $CRRA = 10$  case, the results would imply that individuals are willing to pay \$9 for (full) donut hole coverage, would have to be paid \$22 to go from a 0 deductible to a \$250 deductible, and would have to be paid \$8 to accept generic donut hole coverage (since these values are driven entirely by misspecification there is no reason the signs should be sensible). The third restriction is satisfied in the sense that we estimate risk aversion in all cases when the coefficient of risk aversion is greater than 0. The “risk index” is obtained by dividing two times the coefficient on the variance term by the coefficient on premiums. We showed above that with CARA utility and normal noise, this index should approximate to ( $10^6$  times) the coefficient of absolute risk aversion. We see in Appendix Table 1 that this approximation seems to get things roughly correct in our sample (despite the fact that costs are non-normal), although it begins to break down when risk aversion is grows very large.

Appendix Table 1: Simulation Results

	CRRRA (wealth = 17000)			CARA		
	<b>1</b>	<b>3</b>	<b>10</b>	<b>0.0001</b>	<b>0.0003</b>	<b>0.0005</b>
Premium	-5.385**	-5.057**	-3.407**	-5.288**	-4.774**	-3.877**
(hundreds)	(.0364)	(.0337)	(.0199)	(.0354)	(.0312)	(.0237)
OOP Cost	-5.355**	-4.911**	-2.767**	-5.284**	-4.517**	-3.379**
(hundreds)	(.0369)	(.0335)	(.0237)	(.0359)	(.0324)	(.0268)
Variance	-1.903**	-6.293**	-19.87**	-2.600**	-9.244**	-16.28**
(times 10 <sup>6</sup> )	(.1536)	(.1329)	(.1985)	(.1489)	(.1436)	(.1919)
Deductible	-.0409	-.1567**	-.4452**	-.0424	-.2177**	-.3728**
(hundreds)	(.0225)	(.0211)	(.0188)	(.0221)	(.0211)	(.0198)
Donut Hole	-.0390	-.2506**	.2974**	.0210	-.0254	-.2393**
	(.0863)	(.0781)	(.0549)	(.0657)	(.0703)	(.0626)
Generic Donut Hole	-.0470	-.1412*	-.2829**	-.0325	-.1326**	-.2782**
	(.0680)	(.0652)	(.0560)	(.0657)	(.0629)	(.0571)
Cost Sharing	.1905	1.207**	2.791**	.2915	1.672**	2.726**
	(.2546)	(.2425)	(.2114)	(.2505)	(.2393)	(.2230)
# in Top 100	.0115	-.0045	-.0056**	.0110	-.0121**	-.0098**
	(.0036)	(.0031)	(.0023)	(.0036)	(.0029)	(.0024)
Avg. Quality Rating	-.1281	-.0508	.0525**	-.1186	-.0082	.0349**
	(.0181)	(.0164)	(.0128)	(.0175)	(.0155)	(.0137)
Risk Index	71	249	1166	98	387	840
# of patients	94732	94732	94732	94732	94732	94732
# of plans	702	702	702	702	702	702
# of states	47	47	47	47	47	47
# of brands	36	36	36	36	36	36

**Notes:** Table shows conditional logit results from estimating the model given in equation (6) by maximum likelihood using simulated choices. Each column shows coefficients from a single regression. The coefficients reported are the parameters of the utility function, not marginal effects. Standard errors are in parentheses. \* indicates significance at the 5% level and \*\* indicates significance at the 1% level. The sample differs slightly from that in Table 1 because individuals with greater than 17000 in total costs for any plan are dropped. All simulated choices are based on the cost distribution generated from the realized costs of 200 individuals in the same decile of 2005 total costs, decile of 2005 total days supply of branded drugs and decile of 2005 days supply of generic drugs. The first three columns compute expected utility using a CRRRA utility function with wealth of 17000 and the indicated coefficient of relative risk aversion, assuming that individuals select the choice which maximizes expected utility. The final three columns compute expected utility using a CARA utility function with the indicated coefficient of absolute risk aversion. Variable definitions are otherwise identical to Table 1.

## Appendix B: Modeling Private Information

In Part V of the paper we discuss an alternative model that incorporates private information. This appendix presents a formal derivation of that model.

Suppose that utility is given by:

$$u_{ij} = \mu_{ij}^* \beta_1 + \epsilon_{ij} \quad (6)$$

where  $\mu_{ij}^*$  represents expected costs, defined as the individual's expectations of out of pocket costs at the time when they make their choice (for ease of exposition, we momentarily ignore the premium and variance terms).  $\mu_{ij}^*$  is not observed. However, we do observe realized costs, which can be written as the sum of expected costs and a noise term, defined as the component of realized costs unknown to the individual at the time of plan choice:

$$C_{ij} = \mu_{ij}^* + \eta_{ij} \quad (7)$$

where  $C_{ij}$  denote the realized costs of individual  $i$  upon enrolling in plan  $j$ ,  $\mu_{ij}^*$  denotes expected costs, and  $\eta_{ij}$  denotes noise. We can further decompose expected costs into the component of expected costs predictable from 2005 data,  $\mu_{ij}$ , and the component which is private information,  $\theta_{ij}$ . This yields:

$$C_{ij} = \mu_{ij} + \theta_{ij} + \eta_{ij} \quad (8)$$

We assume that  $\mu_{ij}$  and  $\theta_{ij}$  are independent of  $\eta_{ij}$ .<sup>23</sup> This assumption implies that individuals are aware at the time when they make their choices of the component of costs that can be predicted based on their previous year's consumption. This "rational

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<sup>23</sup> Combined with the additive structure assumed above, the assumption of independence also rules out the case in which the degree of uncertainty about costs varies with the level of expected costs. We relax this strong assumption below by assuming only that  $\mu_{ij}$  and  $\eta_{ij}$  are conditionally independent given the measured variance of costs.



expectations” assumption is substantive, but conforms with the baseline rational choice model that is implicitly tested by our analysis. We discuss this issue further below.

If this were a linear model, the assumption of independence would be sufficient to identify  $\beta_1$ . This assumption implies that we have a classical measurement error problem:  $C_{ij}$  is a noisy measure of  $\mu_{ij}$ . As usual, this problem can be solved with instrumental variables and in this case,  $\mu_{ij}$  is a valid instrument – it is correlated with  $C_{ij}$  and uncorrelated with  $\eta_{ij}$ , so instrumenting for  $C_{ij}$  with  $\mu_{ij}$  would consistently estimate  $\beta_1$ . Because the model is non-linear, we need to be more explicit about the form of the measurement error to obtain consistent estimation. First, we rewrite equation (7) substituting in equation (8):

$$u_{ij} = C_{ij}\beta_1 - \eta_{ij}\beta_1 + \varepsilon_{ij} \quad (9)$$

We assume further that  $\varepsilon_{ij} \sim N(0, \tau_{ij}^2)$  and  $\eta_{ij} \sim N(0, \sigma_{ij}^2)$ . Combined with equation (8), the normal updating formula implies:

$$f(\eta_{ij} | C_{ij}, \mu_{ij}) \sim N\left(\frac{\sigma_{ij}^2}{\sigma_{ij}^2 + \tau_{ij}^2} (C_{ij} - \mu_{ij}), \frac{\tau_{ij}^2 \sigma_{ij}^2}{\sigma_{ij}^2 + \tau_{ij}^2}\right) \quad (10)$$

We do not observe  $\sigma_{ij}^2$  or  $\tau_{ij}^2$ . However, provided we assume that

$\text{Var}(\varepsilon_{ij} + \eta_{ij} | i, j) = \text{Var}(\varepsilon_{ij} + \eta_{ij} | Z_{i,j})$  where  $Z_{i,j}$  are the variables which define each cell

– that is, we assume that there is no heterogeneity in the variance of costs within cells –

we do observe  $\text{Var}(\varepsilon_{ij} + \eta_{ij}) = \tilde{\sigma}_{ij}^2$ . This is the variance we construct from the 1000 cell

exercise. This still leaves us with a separate parameter to identify for each (i,j) pair. We

additionally assume that a constant fraction  $\tau_{frac}$  of the variance of costs within cells is

due to private information. That is, we assume that  $\tau_{ij}^2 = \tau_{frac} \tilde{\sigma}_{ij}^2$  and

$\sigma_{ij}^2 = (1 - \tau_{frac})\sigma_{ij}^2$ . As written, this is a random coefficients model with one additional parameter beyond the  $\beta$ 's -  $\tau_{frac}$ , the degree of private information.

How is  $\tau_{frac}$  identified? Equation (10) suggests a simple intuition. We can think of the model as one with a fixed coefficient  $\beta_1$  on  $C_{ij}$  and a random coefficient with mean  $\frac{\beta_1\sigma_{ij}^2}{\sigma_{ij}^2 + \tau_{ij}^2} = \frac{\beta_1(1 - \tau_{frac})\sigma_{ij}^2}{\sigma_{ij}^2} = \beta_1(1 - \tau_{frac})$  on  $C_{ij} - \mu_{ij}$ . Thus, the degree of private information is identified by the degree to which the coefficient on  $C_{ij} - \mu_{ij}$  falls short of the coefficient on  $C_{ij}$ . If individuals have no information beyond what can be predicted from 2005 costs, we will observe  $\tau_{frac} = 0$ , and equation (9) will simplify to:

$$u_{ij} = C_{ij}\beta_1 - (C_{ij} - \mu_{ij})\beta_1 + \epsilon_{ij} = \mu_{ij}\beta_1 + \epsilon_{ij} \quad (11)$$

If on the other hand individuals have perfect information about 2006 costs, we will observe  $\tau_{frac} = 1$ , and equation (9) will simplify to:

$$u_{ij} = C_{ij}\beta_1 + \epsilon_{ij} \quad (12)$$

In the interim case, individual's choose based on a linear combination of  $C_{ij}$  and  $\mu_{ij}$ , and the random coefficient on  $C_{ij} - \mu_{ij}$  captures the fact that different individuals with the same  $C_{ij}$  and  $\mu_{ij}$  can have varying amounts of private information.

This model also has implications for the variance term and the measurement of risk aversion. The measured variance from the 1000 cell exercise  $\sigma_{ij}^2$  overstates the true variance in costs because some of this variation represents variation in realized costs which is unpredictable based on 2005 costs but is known to the individual at the time when they choose. Thus, the correct variance to use in the model is  $(1 - \tau_{frac})\sigma_{ij}^2$ , the variance of the noise term. To the extent that individuals are responsive to the variance

term, omitting this correction will tend to bias our estimates of risk aversion downward

by a factor of  $\frac{1}{1 - \tau_{frcost}}$ .<sup>24</sup>

Reintroducing the variance and the premium term, we obtain:

$$u_{ij} = \pi_{ij}\beta_0 + c_{ij}\beta_1 - \eta_{ij}\beta_1 + (1 - \tau_{frcost})\sigma_{ij}^2\beta_2 + \epsilon_{ij} \quad (13)$$

where the distribution of  $\eta_{ij}$  is given by equation (10).

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<sup>24</sup> Note that this model does not directly allow for private information about the variance of costs; in some cases, individuals may learn that they are at risk of developing a certain condition which would require treatment with prescription drugs. This knowledge would increase their expected out of pocket costs in the coming year and would also increase the variance in their forecast. The model above does not allow for this type of information; while the model allows individuals in the same cell to have different values of expected costs based on their realization of private information, we continue to assume that all individuals in the same cell in the 1000-cell model face the same variance. To the extent that this assumption is false, our model could be viewed as substituting the predicted variance given the variables used to construct the 1000-cell model for the actual variance.