

January 6, 2026

Pre-Rule Making Review Clinician Committee
Batelle
Partnership for Quality Measurement

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RE: Feedback on Release of Measures Under Consideration List for 2025 Review Cycle

The Academy of Nutrition and Dietetics (the Academy) appreciates the opportunity to comment on select measures included on the 2025 Measures Under Consideration (MUC) List. We commend CMS for its continued leadership in advancing interoperable, outcomes-focused quality measurement and for its emphasis on digitally enabled, patient-centered measures that promote meaningful alignment across quality programs.

The Academy supports the inclusion of MUC2025-034, Low-Density Lipoprotein Cholesterol (LDL-C) Monitoring and Management, on the Measures Under Consideration List for the Merit-based Incentive Payment System. For patients with clinical atherosclerotic cardiovascular disease, this outcome-focused measure aligns with updated clinical guidelines and evidence demonstrating that achieving LDL-C levels below 70 mg/dL is associated with meaningful reductions in cardiovascular risk.¹

As noted in the measure rationale, earlier intervention with cholesterol-lowering therapy is associated with improved patient outcomes when paired with healthy lifestyle changes. Medical Nutrition Therapy (MNT) provided by registered dietitian nutritionists (RDNs) is a critical component of LDL-C management, with evidence demonstrating clinically meaningful reductions in LDL-C (mean reduction of 11.56 mg/dL).²

By focusing on both monitoring and achievement of LDL-C targets, this measure appropriately captures a clinically meaningful outcome while allowing flexibility in how care teams support patients in reaching that goal. Inclusion of this measure would encourage earlier identification of gaps in lipid control, reinforce evidence-based management approaches, and support patient-centered, outcomes-driven care that is comprehensive of pharmacological and lifestyle interventions as part of comprehensive ASCVD management.

The Academy appreciates CMS's continued commitment to advancing quality measurement that improves cardiovascular outcomes for patients with ASCVD. By emphasizing both LDL-C monitoring and achievement of evidence-based targets, MUC2025-034 supports earlier intervention, reinforces guideline-concordant care, and promotes a comprehensive, team-based approach that integrates pharmacologic therapy with lifestyle and nutrition interventions. The Academy appreciates the opportunity to provide input on this measure and looks forward to continued collaboration with CMS as it considers measures that

¹ Writing Committee; Lloyd-Jones DM, Morris PB, Ballantyne CM, Birtcher KK, Covington AM, DePalma SM, Minissian MB, Orringer CE, Smith SC Jr, Waring AA, Wilkins JT. 2022 ACC Expert Consensus Decision Pathway on the Role of Nonstatin Therapies for LDL-Cholesterol Lowering in the Management of Atherosclerotic Cardiovascular Disease Risk: A Report of the American College of Cardiology Solution Set Oversight Committee. J Am Coll Cardiol. 2022 Oct 4;80(14):1366-1418. doi: 10.1016/j.jacc.2022.07.006. Epub 2022 Aug 25. Erratum in: J Am Coll Cardiol. 2023 Jan 3;81(1):104. doi: 10.1016/j.jacc.2022.11.016.

² Mohr AE, Hatem C, Sikand G, Rozga M, Moloney L, Sullivan J, De Waal D, Handu D. Effectiveness of medical nutrition therapy in the management of adult dyslipidemia: A systematic review and meta-analysis. J Clin Lipidol. 2022 Sep-Oct;16(5):547-561. doi: 10.1016/j.jacl.2022.06.008.

meaningfully advance patient-centered, outcomes-driven cardiovascular care.

Sincerely,

A handwritten signature in cursive script that reads "Angela Lago".

Angela Lago, MS, RDN, LDN, FAND
Sr. Director, Quality, Standards and Interoperability
Academy of Nutrition and Dietetics

A handwritten signature in cursive script that reads "Kim Iles, MS, RDN".

Kim Iles, MS, RDN
Sr. Manager, Nutrition Services Coverage
Academy of Nutrition and Dietetics