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VIA ELECTRONIC DELIVERY

Mehmet Oz, MD, MBA
Administrator
Centers for Medicare & Medicaid Services
Department of Health and Human Services
Baltimore, MD 21244-8016

Re: Pre-Rulemaking Measure Review Recommendations on 2025 Measures Under Consideration

Dear Administrator Oz:

Amgen Inc. (Amgen) appreciates the opportunity to comment on the Pre-Rulemaking Measure Review (PRMR) Committee's recommendations on the 2025 Measures Under Consideration. Amgen supports the PRMR Committee's recommendation to adopt the Low Density Lipoprotein Cholesterol (LDL-C) Monitoring and Management measure (MUC2025-034) for use in the Merit-based Incentive Payment System (MIPS).

As reflected in the PRMR voting results, the Committee reached consensus agreement recommending the measure for use in MIPS. Amgen agrees with the Committee's determination that this outcome measure aligns more closely with cardiovascular risk reduction than existing process measures and also aligns with other chronic disease control measures.

Amgen urges CMS to adopt the LDL-C Monitoring and Management measure consistent with the PRMR Committee's recommendation. LDL-C is a well-established, modifiable risk factor for atherosclerotic cardiovascular disease, and consistent monitoring and management are foundational to guideline-directed care. Adoption of this measure would help advance CMS's goals to promote high-quality, value-based care and improve cardiovascular outcomes across the Medicare population.

We appreciate your consideration of our comments on the PRMR Committee's recommendations. Please do not hesitate to contact Yola Gawlik by phone at (202) 320-1159 or by email at ygawlik@amgen.com if you have any questions regarding our comments.

Sincerely,

Yola Gawlik
Executive Director
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