

February 6, 2026

Dr. Mehmet Oz
Administrator, Centers for Medicare and Medicaid Services
US Department of Health and Human Services
Hubert H. Humphrey Building
200 Independence Avenue SW
Washington, DC 20201

SUBMITTED ELECTRONICALLY VIA PARTNERSHIP FOR QUALITY MEASUREMENT WEBSITE

RE: PRMR 2025-2026 Recommendations Spreadsheet – Low Density Lipoprotein Cholesterol (LDL-C) Monitoring and Management (ID# MUC2025-034)

Dear Dr. Oz:

Novartis appreciates the Centers for Medicare and Medicaid Services' (CMS') evaluation of new quality improvement measures through its 2025 Measures Under Consideration (MUC) List which have the potential to help improve outcomes for millions of Medicare seniors, including the American Heart Association's **Low Density Lipoprotein Cholesterol (LDL-C) Monitoring and Management (ID# MUC2025-034)** quality measure.

We applaud the Partnership for Quality Measurement (PQM) for recommending the LDL-C measure for use in the Merit-Based Incentive Payment System (MIPS). We believe this widely supported measure can benefit the millions of patients, families, and caregivers impacted by Atherosclerotic Cardiovascular Disease (ASCVD) as well as the health care systems and taxpayers carrying the significant cost burden of this disease.

Additionally, we agree with PQM that the LDL-C measure represents a shift toward outcome-focused lipid management and that targeting LDL-C control rather than solely tracking statin prescribing aligns more closely with cardiovascular risk reduction and allows for individualized treatment approaches. As such, we strongly recommend CMS implement the LDL-C measure as part of the CY 2027 MIPS rulemaking cycle.

We thank CMS for the continued engagement, and we look forward to continuing work with the agency on policy solutions to improve care outcomes in Medicare. Please feel free to contact us at lisa-2.nelson@novartis.com or via phone at (202) 876-5548 if we can provide any further assistance.

Sincerely,

Peter Gargalovic, PhD
Executive Director, Medical Team Leader - CV, Renal, and Metabolism (CRM)