June 8, 2023

Re: **Support for Geriatrics Hospital Measure and the Geriatrics Surgical Measure in the CMS Hospital Inpatient Quality Reporting (IQR) Program**

File code CMS-1785-P

Attn: Centers for Medicare & Medicaid Services, US Department of Health and Human Services

We write to express our strong support for inclusion of the Geriatrics Hospital Measure and the Geriatrics Surgical Measure in the CMS Hospital Inpatient Quality Reporting (IQR) Program. These measures are a "programmatic composite" measure, which considers the full program of care needed for hospital patients who are age 65 and older. Developed by the American College of Surgeons (ACS), the Institute for Healthcare Improvement (IHI), and the American College of Emergency Physicians (ACEP), these measures are designed to help build a better, safer, more age-friendly environment for geriatric hospital patients and will help patients and caregivers know where to get high-quality care that is in line with their values.

The U.S. population is aging rapidly and the health care system has a tremendous shortage of health professionals trained in providing geriatric care. Almost 96 percent of Medicare beneficiaries are age 65 or older. The number of older Americans ages 65 and older will more than double over the next 40 years, reaching more than 80 million by 2040. Age is the biggest risk factor for Alzheimer's disease and related dementias (ADRD); today, more than a third of people age 85 or older have Alzheimer's dementia. The number of Americans ages 85 and older will nearly quadruple by 2040. Fifty-four percent of Medicare beneficiaries diagnosed with ADRD have five or more chronic conditions, making their care difficult to manage.

Hospitals are increasingly faced with older patients who have complex medical, physiological, and psychosocial needs that often are inadequately addressed by the current health care infrastructure. In particular, patients living with ADRD have extraordinary difficulty navigating a hospital environment. Because of the effects of ADRD on the mind, including behavioral complications and progressive loss of capacity to participate in care or decision-making, the devastating impacts on caregivers, and the scope of disease management beyond medical issues, the management of ADRD demands different approaches to how hospitals customarily have treated patients living with ADRD.

The shortcomings in caring for older individuals also are reflected in current quality measurement efforts, which are disjointed and siloed in nature. Current measures fail to incentivize care teams and facilities to coordinate care for geriatric patients and do not provide the public with information on where to seek good, safe geriatrics care.

We agree strongly with CMS that these measures align with CMS' National Quality Strategy goal to "embed quality into the care journey," by taking a person-centered approach to ensure a smoother care journey for a patient population that often has complex needs. We specifically support the inclusion of "cognition and delirium" as one of the key domains to be measured by both the geriatrics surgery measure and a geriatrics hospital measure.

Too many hospital patients with ADRD are not treated as whole individuals. By explicitly requiring hospitals to report on how many patients receive cognitive screens, we hope to increase the number of people who receive equitable, timely, accurate, compassionate, and actionable (ETACA) detection and diagnosis. Each of the domains listed in the proposed rule would greatly improve the care delivered to hospital patients 65 years and older through patient-centered competencies aimed at achieving quality of care and safety for older adults. If adopted, these measures would be mandatory and would enable people living with dementia and their caregivers to choose hospitals that have demonstrated effectiveness in treating older patients.

Vitally, the measures put an emphasis on the importance of defining hospital patient (and caregiver) goals not only from the immediate treatment decision but also for long-term health and aligning care with what the patient values. The measures drive teams to portray transparently their quality and seek to improve continuously. The measures also can provide the public with information that reflects a care delivery team where the hospital and the related specialties are collaborating in a meaningful way.

We appreciate the opportunity to share our support for the Geriatrics Hospital Measure and Geriatrics Surgery Measure for inclusion in the CMS Hospital IQR program. We applaud CMS for proposing that the Geriatrics Hospital Measure be one of only three structural measures that have been proposed so far. While a programmatic composite is not typical for CMS programs, these measures are a critical piece in optimizing care for older patients by using a holistic approach to create a quality program that better serves the needs of Medicare beneficiaries, especially those living with dementia.

For questions or additional information, please contact LEAD Coalition[i] executive director Ian Kremer at ikremer@leadcoalition.org.

Sincerely,

Acadia Pharmaceuticals Inc

ACCSES – The Voice of Disability Service Providers

ACMCRM Arachnoiditis & Chronic Meningitis Collaborative Research Network

ActivistsAgainstAlzheimer's Network

ADvancing States

African American Network Against Alzheimer's

Nimit Agarwal MD (University of Arizona, Department of Medicine, Division of Geriatric Medicine*)

AgeWell Collaboratory of Drexel University

Neelum T. Aggarwal, MD (Rush University Medical Center*)

Aging and Memory Disorder Programs, Howard University

Benedict C. Albensi, PhD, BCMAS, CRQM (Nova Southeastern University*)

Alliance for Aging Research

Alzheimer's Disease Resource Center, Inc.

Alzheimer's Drug Discovery Foundation

Alzheimer's Foundation of America

Alzheimer's Los Angeles

Alzheimer's New Jersey

Alzheimer's Orange County

Alzheimer's San Diego

Alzheimer's Tennessee

Takashi Amano, PhD, MSW (Rutgers University Newark*)

AMDA – The Society for Post-Acute and Long-Term Care

American Association for Geriatric Psychiatry

American Academy of Neurology

American Brain Coalition

American College of Preventive Medicine (ACPM)

American Federation for Aging Research (AFAR)

American Medical Women's Association

American Neurological Association

American Society of Consultant Pharmacists (ASCP)

American Society on Aging

Halima Amjad, MD, PhD, MPH (Johns Hopkins University*)

Brian S. Appleby, M.D. (Case Western Reserve University School of Medicine*)

Argentum | Expanding Senior Living

Association of California Caregiver Resource Centers (ACCRC)

Athira Pharma, Inc.

Rhoda Au, Ph.D. (Boston University Chobanian & Avedisian School of Medicine and Public Health*)

Autistic Women & Nonbinary Network — AWN

Laura D. Baker, PhD (Wake Forest University School of Medicine*)

The Balm In Gilead, Inc.

Banner Alzheimer's Institute

Banner Health

David M. Bass, PhD (Benjamin Rose Institute on Aging*)

Baylor Scott & White Health

Benjamin Rose Institute on Aging

Biogen

Marie Boltz, PhD, GNP-BC, FGSA, FAAN (Penn State College of Nursing*)

Soo Borson MD (USC Keck School of Medicine*)

Nicole Bouranis PhD (Drexel University College of Nursing and Health Professions*)

Andrea Bozoki, MD, FAAN (University of North Carolina, Chapel Hill*)

The Brain Donor Project

Bridge Builder Strategies

BrightFocus Foundation

Brookdale Senior Living Inc.

Stephanie Buss, MD (Harvard University, Beth Israel Deaconess Medical Center, Neurology Department, Cognitive Neurology Unit*)

Danielle Goldfarb Cabral, MD (University of Arizona College of Medicine*)

Christopher M. Callahan, MD (Indiana University Center for Aging Research*)

Caregiver Action Network

CaringKind, The Heart of Alzheimer's Caregiving

Maria Torroella Carney, MD (Zucker School of Medicine at Hofstra/Northwell*)

Center for BrainHealth at The University of Texas at Dallas

Center to Advance Palliative Care

Chambers-Grundy Center for Transformative Neuroscience, Department of Brain Health, UNLV

Marianne Chanti-Ketterl, PhD, MSPH (Bryan Alzheimer's Disease Research Program, Duke University*)

Sandra Bond Chapman, PhD (Center for BrainHealth at The University of Texas at Dallas*)

Joshua Chodosh, MD, MSHS, FACP (NYU Grossman School of Medicine*)

Urvika Choksey, MD (Yale School of Medicine*)

ClergyAgainstAlzheimer's Network

Carolyn Clevenger, DNP (Emory University*)

CNS Innovations

Coalition of Wisconsin Aging and Health Groups

Cognitive Dynamics Foundation

Tara A. Cortes, PhD, RN, FAAN, FGSA (NYU Rory Meyers College of Nursing, The Hartford Institute for Geriatric Nursing*)

Creutzfeldt-Jakob Disease Foundation

Jeffrey Cummings, MD, ScD (University of Nevada Las Vegas*)

Lenise Cummings-Vaughn, MD (Washington University School of Medicine*)

Walter Dawson, Dphil (Oregon Health & Science University*)

Dementia Alliance International

Dementia Alliance of North Carolina

DigiCARE Realized Inc.

Elizabeth Disbrow, PhD (LSU Health Shreveport Center for Brain Health*)

Diverse Elders Coalition

N. Maritza Dowling PhD (The George Washington University School of Nursing*)

Drexel University College of Nursing and Health Professions

Eisai, Inc.

Eli Lilly and Company

The Emory Goizueta Alzheimer's Disease Research Center

Fayron Epps, PhD, RN, FGSA, FAAN (Emory University, Nell Hodgson Woodruff School of Nursing*)

Gary Epstein-Lubow, MD (Alpert Medical School of Brown University & Brown University School of Public Health*)

Faith United Against Alzheimer's Coalition

Family Caregiver Alliance

Maningbe Keita Fakeye, PhD (Johns Hopkins University Bloomberg School of Public Health*)

Brent P. Forester, MD, MSc (Harvard Medical School*)

Richard H. Fortinsky, PhD (UConn Center on Aging, University of Connecticut School of Medicine*)

Frank & Barbara Broyles Legacy Foundation

Sam Gandy, MD, PhD (Icahn School of Medicine at Mount Sinai*)

Joseph E. Gaugler, PhD (School of Public Health, University of Minnesota*)

GE HealthCare

David S. Geldmacher, MD, FACP (University of Alabama at Birmingham School of Medicine*)

Genentech

Genetic Alliance

Georgetown University Medical Center Memory Disorders Program

Gerontological Advanced Practice Nurses Association

The Gerontological Society of America

Thomas M. Gill, M.D. (Yale School of Medicine*)

Laura Gillen, MS (McDaniel College*)

Meredith Gilliam MD MPH (University of North Carolina*)

Andrea Gilmore-Bykovskyi, PhD, RN (University of Wisconsin School of Medicine & Public Health*)

Laura N. Gitlin, PhD (Drexel University, College of Nursing and Health Professions*)

Global Alzheimer's Platform Foundation

Global CEO Initiative on Alzheimer's Disease

Lisa P. Gwyther, MSW, LCSW (Duke University Medical Center*)

Duke Han, PhD (Keck School of Medicine of USC*)

The Hartford Institute for Geriatric Nursing, NYU Rory Meyers College of Nursing

Healthcare Leadership Council

HealthMatters Program

HealthyWomen

Patricia C. Heyn, PhD, FGSA, FACRM (Marymount University*)

HFC

Nikki L. Hill, PhD, RN (The Pennsylvania State University, Ross and Carol Nese College of Nursing*)

Nancy A. Hodgson, RN, PhD, FAAN (University of Pennsylvania School of Nursing*)

David M. Holtzman, MD (Washington University School of Medicine, Department of Neurology*)

William Hu MD, PhD, FAAN (Rutgers University*)

Huffington Center on Aging, Baylor College of Medicine

Ula Hwang, MD, MPH (Yale University School of Medicine*)

Hypertrophic Cardiomyopathy Association

ICAN, International Cancer Advocacy Network

International Association for Indigenous Aging

Iona Senior Services

Kathy Jedrziewski, PhD (University of Pennsylvania*)

Lee A. Jennings, MD, MSHS (University of Oklahoma Health Sciences Center*)

Johns Hopkins Memory and Alzheimer's Treatment Center

Katherine S. Judge, PhD (Cleveland State University*)

Justice In Aging

Ara S. Khachaturian, PhD (University of Nevada Las Vegas*)

Zaven S. Khachaturian, PhD (Johns Hopkins University*)

Amy J.H. Kind, MD, PhD (University of Wisconsin School of Medicine and Public Health*)

Walter A. Kukull, PhD (School of Public Health, University of Washington*)

Latino Alzheimer's and Memory Disorders Alliance

LatinosAgainstAlzheimer's

Allan Levey, MD, PhD (Emory University School of Medicine*)

Lewy Body Dementia Association

Life Molecular Imaging

Linked Senior, Inc

Livpact Inc.

Long-Term Quality Alliance

LuMind IDSC Foundation

Lundbeck Pharmaceuticals LLC

Lupus and Allied Diseases Association, Inc.

Kostas Lyketsos, M.D., M.H.S. (Johns Hopkins Memory and Alzheimer's Treatment Center*)

Beth Marks, PhD, RN, FAAN (University of Illinois at Chicago*)

David X. Marquez, PhD (Department of Kinesiology and Nutrition, University of Illinois at Chicago*)

Massachusetts Alzheimer's Disease Research Center (Harvard Medical School, Mass General Brigham)

Donovan Maust, MD, MS (University of Michigan Medical School*)

Medical Imaging & Technology Alliance (MITA)

Merck

Michigan State University Alzheimer's Alliance

Milken Institute Alliance to Improve Dementia Care

Brienne Miner, MD MHS (Yale University School of Medicine*)

Mary Mittelman, DrPH (New York University Medical Center*)

David G. Morgan, PhD (Michigan State University*)

Darby Morhardt, PhD, LCSW (Northwestern University Feinberg School of Medicine*)

Laura Mosqueda MD (Keck School of Medicine of USC*)

Mount Sinai Center for Cognitive Health

Aanand Naik, MD (University of Texas Health Houston*)

National Alliance for Caregiving

National Association of Activity Professionals

National Association of Chronic Disease Directors

National Association of Social Workers (NASW)

National Association of State Long-Term Care Ombudsman Programs (NASOP)

National Caucus and Center on Black Aged, Inc. (NCBA)

National Certification Council for Activity Professionals

National Consumer Voice for Quality Long-Term Care

National Down Syndrome Society

National Hartford Center of Gerontological Nursing Excellence

National Minority Quality Forum

National Task Group on Intellectual Disabilities and Dementia Practices

NFL Neurological Center

Noah Homes

Thomas O. Obisesan, MD, MPH (Howard University Hospital*)

The Ohio Council for Cognitive Health

Organic Acidemia Association

Otsuka America Pharmaceutical Inc.

Monica W. Parker, MD (Goizueta Alzheimer's Disease Research Center, Emory University*)

Partnership to Fight Chronic Disease

Patients Rising Now

Pat Summitt Foundation

Planetree International, Inc.

Anton P. Porsteinsson, M.D. (University of Rochester School of Medicine and Dentistry*)

Positrigo AG

Katherine Possin, PhD (University of California San Francisco, Memory and Aging Center*)

Daniel Z. Press, MD (Harvard Medical School*)

Prevent Alzheimer's Disease 2020

Program to Improve Eldercare, Altarum

Peter Reed, PhD (Sanford Center for Aging, University of Nevada, Reno*)

Eric Reiman, MD (Banner Alzheimer's Institute*)

ResearchersAgainstAlzheimer's

RetireSafe

Roche Diagnostics Corporation

David B. Reuben, MD (David Geffen School of Medicine at UCLA*)

Emma Rhodes, PhD (University of Pennsylvania, Department of Neurology, Frontotemporal Degeneration Center*)

Emily Rogalski, PhD (Northwestern University, Mesulam Center for Cognitive Neurology & Alzheimer's Disease*)

Stephen Salloway, M.D., M.S. (The Warren Alpert Medical School of Brown University*)

Quincy Miles Samus, PhD, MS (Johns Hopkins School of Medicine*)

Suzanne Schindler MD, PhD (Washington University School of Medicine, Department of Neurology*)

Second Wind Dreams, Inc./ Virtual Dementia Tour

Amanda G. Smith, M.D. (USF Health Byrd Alzheimer's Institute*)

Tetyana Shippee, PhD (University of Minnesota, School of Public Health*)

Jasmina Sisirak, PhD (University of Illinois at Chicago*)

Gary Small, MD (Hackensack Meridian School of Medicine*)

Society for Women's Health Research

Alan B. Stevens, PhD (Baylor Scott & White Health, Center for Healthcare Policy*)

Don Sullivan, MD, MA, MCR (Oregon Health & Science University*)

Russell H. Swerdlow, M.D. (University of Kansas School of Medicine*)

Quratulain Syed MD, AGSF (Emory University*)

Rudolph Tanzi, PhD (Department of Neurology, MGH/Harvard Medical School*)

Pierre N. Tariot, MD (University of Arizona College of Medicine*)

Texas Rare Alliance

The Association for Frontotemporal Degeneration

TimeSlips Creative Storytelling, Inc.

Trellis/ACT on Alzheimer's

Geoffrey Tremont, Ph.D., ABPP-CN (Alpert Medical School of Brown University*)

R. Scott Turner, MD, PhD (Georgetown University Memory Disorders Program*)

UCLA Mary S. Easton Center for Alzheimer's Disease Research, David Geffen School of Medicine

University of Minnesota Center for Healthy Aging and Innovation (CHAI)

University of Rochester Alzheimer's Disease Care, Research and Education Program (AD-CARE)

UsAgainstAlzheimer's, LEAD Coalition co-convener

Ipsit Vahia, MD (Harvard Medical School*)

VeteransAgainstAlzheimer's

Anand Viswanathan, MD, PhD (Massachusetts General Hospital and Alzheimer's Disease Research Center*)

Voices of Alzheimer's

Stella L. Volpe, PhD, RDN, ACSM-CEP, FACSM (Virginia Tech*)

Volunteers of America, LEAD Coalition co-convener

Keith Vossel, MD, MSc (Mary S. Easton Center for Alzheimer's Disease Research, David Geffen School of Medicine at UCLA*)

Victoria Walker MD, FAAFP, CMD (Sanford School of Medicine, University of South Dakota*)

David A. Weidman, MD, FAAN (Banner Alzheimer's Institute*)

Carol J. Whitlatch, PhD (Benjamin Rose Institute on Aging*)

Nancy Wilson, MA LCSW (Baylor College of Medicine*)

Jennifer Wolff, PhD (Johns Hopkins Bloomberg School of Public Health*)

WomenAgainstAlzheimer's

Mia Yang MD MS (Wake Forest School of Medicine, Department of Internal Medicine - Section on Geriatric Medicine & Gerontology*)

Julie M. Zissimopoulos, Ph.D. (University of Southern California, Price School of Public Policy*)

Affiliations of individual researchers are for identification purposes only and do not necessarily represent the endorsement of affiliated institutions.

[i] The LEAD Coalition (Leaders Engaged on Alzheimer's Disease http://www.leadcoalition.org/) is a diverse national coalition of member organizations including patient advocacy and voluntary health non-profits, philanthropies and foundations, trade and professional associations, academic research and clinical institutions, and home and residential care providers, large health systems, and biotechnology and pharmaceutical companies. The LEAD Coalition works collaboratively to focus the nation's strategic attention on dementia in all its causes -- including Alzheimer's disease, vascular disease, Lewy body dementia, and frontotemporal degeneration -- and to accelerate transformational progress in detection and diagnosis, care and support, and research leading to prevention, effective treatment, and eventual cure. One or more participants may have a financial interest in the subjects addressed.