

NATIONAL ALLIANCE FOR CAREGIVING

Making Caregiving More Sustainable, Dignified, and Equitable



June 10, 2025

Mehmet C. Oz, MD, Administrator
Centers for Medicare & Medicaid Services (CMS)
Department of Health and Human Services
7500 Security Boulevard
Baltimore, Maryland 21244

Submitted electronically via <http://www.regulations.gov>.

RE: Medicare Program; Hospital Inpatient Prospective Payment Systems for Acute Care Hospitals and the Long-Term Care Hospital Prospective Payment System and Policy Changes and Fiscal Year 2026 Rates; Requirements for Quality Programs; and Other Policy Changes

Dear Administrator Oz, MD:

On behalf of the National Alliance for Caregiving (NAC), a national membership-based organization focused on building health and financial and community well-being for family caregivers through research, innovation, and advocacy, we appreciate the opportunity comment in support the continuation of the Age Friendly Hospital Measure as part of the FY 2026 Inpatient Prospective Payment System (IPPS) Proposed Rule [CMS-1833-P] and emphasize its critical importance for family caregivers who provide essential support to older adults during and after hospitalization.

At NAC, we envision a society that values, supports, and empowers the fifty-three million family caregivers providing informal, usually unpaid, care and support to aging family members and people of all ages to thrive at home, work, and life. NAC represents the one in five Americans who make up our nation's community of unpaid family caregivers. As the baby boomer generation ages family caregivers, who often go unrecognized, form the backbone of our long-term care system, as it is families and families of choice who help older adults and people with disabilities or serious healthcare needs to manage their health and wellness.¹ In fewer than 10 years, older adults are projected to outnumber children for the first time in US history; one in every five Americans will be of retirement age.²

¹ AARP and National Alliance for Caregiving. Caregiving in the United States 2020. Washington, DC: AARP. May 2020. <https://doi.org/10.26419/ppi.00103.001>

² <https://www.census.gov/newsroom/press-releases/2020/65-older-population-grows.html>

This demographic shift places unprecedented demands on family caregivers, who provide an estimated \$600 billion in unpaid care annually.³ In 2023, hospital services rose by over 10 percent, with large jumps in Medicare utilization,⁴ and each hospitalization creates additional stress and responsibilities for family caregivers who must navigate complex care transitions and coordinate ongoing care at home.

The Age Friendly Hospital Measure aims to create a better, safer, and patient-centered hospital environment for older adults while providing family caregivers with the transparency they need to make informed decisions about care. Family caregivers consistently report feeling unprepared for care transitions and lacking the information necessary to provide safe, effective care at home.⁵ Structural measures, such as the Age Friendly Hospital Measure, lead to standardizing care, which improves patient outcomes and provides caregivers with more predictable, consistent experiences across healthcare settings. The Measure aligns with the CMS goal of a "universal foundation"⁶ of quality measures and helps reduce the burden on family caregivers who too often must advocate for appropriate care without the benefit of access to clear standards or benchmarks.

We appreciate and support CMS continuing the Age Friendly Hospital Measure, which incorporates The John A. Hartford Foundation and the Institute for Healthcare Improvement's Age-Friendly Health Systems' framework known as the 4Ms (What Matters, Medication, Mentation, Mobility). This framework recognizes the vital role of family caregivers in each domain and is based on several decades of history implementing programs that demonstrably improve patient care, while reducing the stress and burden on family caregivers who must support care at home.

The five domains of this Measure represent crucial aspects of health care provision that directly affect family caregivers' ability to provide safe, effective care:

Patient Health Care Goals: Eliciting patient health care goals enables providers to align treatment plans with what matters most to patients and their families, fostering shared decision-making that includes family caregivers as essential partners in care planning. This domain ensures caregivers understand and can support the patient's care preferences and values.

Medication Management: This domain is vital for family caregivers, who often become responsible for medication administration and monitoring at home. Proper medication management during hospitalization, including reconciliation and education, reduces medication errors and adverse events that caregivers must manage post-discharge. Clear medication plans help caregivers understand complex regimens and identify potential problems.

³ Reinhard, Susan C., Selena Caldera, Ari Houser, and Rita B. Choula. Valuing the Invaluable 2023 Update: Strengthening Supports for Family Caregivers. Washington, DC: AARP Public Policy Institute. March 8, 2023. <https://doi.org/10.26419/ppi.00082.006>

⁴ <https://www.cms.gov/files/document/highlights.pdf>

⁵ Naylor MD. Nursing intervention research and quality of care: influencing the future of healthcare. *Nurs Res.* 2003;52(6):380–5. doi: 10.1097/00006199-200311000-00005.

⁶ <https://www.nejm.org/doi/full/10.1056/NEJMp2215539>

Frailty Screening and Intervention: Early detection and management of cognitive impairment, mobility limitations, and malnutrition significantly impact what caregivers will need to manage at home. When hospitals screen for and address these issues, caregivers receive better preparation and resources for providing appropriate care and support.

Social Vulnerability Screening: This domain directly acknowledges the influence of non-medical drivers of health and the critical role of family caregivers on patient outcomes. It ensures that caregivers' capacity, needs, and challenges are identified and addressed within care plans, recognizing that successful care transitions depend on caregiver preparedness and support.

Age-Friendly Care Leadership: Establishing accountability through dedicated champions ensures consistent quality of care and creates clear points of contact for family caregivers who need information, support, and advocacy during their loved one's hospitalization.

The Age Friendly Hospital Measure closely aligns the key goals of the Make America Healthy Again initiative by promoting transparency and accountability that directly benefits family caregivers. Public reporting helps caregivers identify hospitals that provide comprehensive, age-appropriate care, enabling them to make informed decisions about where their loved ones receive treatment. The Measure also supports appropriate medication prescribing, which reduces medication-related complications that caregivers must manage at home. By promoting physical activity and healthy lifestyles, the Measure helps prevent ongoing functional and cognitive decline that increases caregiver burden. Additionally, the focus on reducing social vulnerability among older adults includes supporting the caregivers who provide essential unpaid care.

The Age Friendly Hospital Measure directly aligns with the Administration's efforts to reduce waste and lower costs while supporting family caregivers. The 4Ms framework reduces unnecessary tests, treatments, and hospitalizations, leading to shorter stays, fewer readmissions, and reduced medication-related harm, which decreases the burden on family caregivers and improves care quality for patients. When hospitals implement age-friendly practices, caregivers participate in smoother care transitions from hospital to home, better discharge planning services, and have access to more comprehensive support resources.

The Age Friendly Hospital Measure provides the framework to ensure that hospitals are prepared to serve older adults and support their family caregivers. We strongly support the continuation of this critical measure that recognizes and supports the essential role of family caregivers in our healthcare system. We appreciate the opportunity to voice our staunch support for the continuation of the Age Friendly Hospital Measure on behalf of the millions of family caregivers across the nation.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jason Resendez', is positioned above the typed name.

Jason Resendez, President and CEO
National Alliance for Caregiving