



December 19, 2025

Mr. Paul B. Masi, M.P.P.  
Executive Director  
Medicare Payment Advisory Commission  
425 I Street NW, Suite 701  
Washington, DC 20007

Dear Mr. Masi:

Thank you for your work and the work of your staff and the Medicare Payment Advisory Commission (MedPAC) to improve the Medicare program. We appreciate MedPAC's transparency and the opportunity for stakeholders such as LeadingAge to engage with them on important issues. We are writing today to express concerns related to their discussions on the Five Star Quality Rating System on Nursing Home Care Compare and to request an opportunity to share additional information that they may find beneficial in deliberations.

**About LeadingAge:** We represent more than 5,400 nonprofit aging services providers and other mission-driven organizations that touch millions of lives every day. Alongside our members and 36 partners in 41 states, we use applied research, advocacy, education, and community-building to make America a better place to grow old. Our membership encompasses the continuum of services for people as they age, including those with disabilities. We bring together the most inventive minds in the field to lead and innovate solutions that support older adults wherever they call home. For more information, visit [leadingage.org](https://www.leadingage.org).

As you know, the Five Star Quality Rating System was introduced in 2009 as a consumer tool to assist Medicare and Medicaid beneficiaries and their loved ones in evaluating and selecting nursing home care. The Five Star rating is a composite rating based on individual ratings in three domains: nursing home health inspections, staffing, and quality measures. The health inspection domain is updated monthly, while the staffing and quality measures domains are updated quarterly.

During MedPAC's April 2025 and December 2025 public meetings, there were discussions about the current methodology for assigning star ratings to nursing homes. It was noted that under current methodology, the health inspection domain rating is weighted most heavily in the overall rating, with only the very highest and very lowest ratings for the staffing and quality measures domains impacting the overall rating. It was further noted that under current methodology, nursing homes are distributed equally among the five star rating tiers. In the December 2025 meeting, Commissioners began to explore alternatives to the current star rating methodology and rating distribution, including options that increased the impact of the staffing and quality measures domain ratings on the overall star rating.

LeadingAge appreciates the Commission's attention to this matter. We share the goal of ensuring a quality rating system that is meaningful to consumers and have our own concerns about where Five Star falls short. We feel strongly, however, that further discussion and engagement with stakeholders is warranted prior to the Commission making any recommendations to the Centers for Medicare &

Medicaid Services (CMS). While we agree that re-weighting the overall rating provides a better picture of quality, we share some of the Commissioners' concerns that any changes should be implemented thoughtfully and believe there may be better alternatives than the ones presented at the December 2025 meeting.

LeadingAge respectfully requests an opportunity to meet with you to further discuss these matters. You may reach out to Jodi Eyigor [jeygior@leadingage.org](mailto:jeygior@leadingage.org) to coordinate or if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Jodi Eyigor". The signature is written in a cursive, flowing style.

Jodi Eyigor  
Senior Director, Nursing Home Quality & Policy

Cc: Dana K. Kelley, M.P.A., Deputy Director