



FORDHAM UNIVERSITY

THE JESUIT UNIVERSITY OF NEW YORK

GRADUATE SCHOOL OF SOCIAL SERVICE
RAVAZZIN CENTER ON AGING & INTERGENERATIONAL STUDIES

December 22, 2023

Pre-Rule Making Measure Review Committee
Partnership for Quality Measurement
MMSsupport@battelle.org

RE: Feedback on Measures Under Consideration List for 2023-2024 Review Cycle

The Fordham University Ravazzin Center on Aging and Intergenerational Studies appreciate the opportunity to submit comments in response to the release of the FY 2023 MUC List. The Ravazzin Center collaborates with students, professionals, and communities to address the needs of older adults and their families through practice, policy, and research. The Center focuses on practices and policies across the lifespan with an emphasis towards promoting social justice.

We commend CMS for considering for inclusion in its payment programs the Global Malnutrition Composite Score for all adults ages 18 or older (MUC2023-114), which is a publicly supported measure that benefits patients, families, and caregivers across all demographic groups—as well as the healthcare system at large. The existing Global Malnutrition Composite Score eCQM for 65+ has been extensively tested and shown that adopting evidence-based malnutrition care best practices is associated with reduced costs and improved patient outcomes. It is significantly important to address malnutrition and health equity.

Reporting on the GMCS is a specific and meaningful action that hospitals can take to align with three of the priorities outlined in CMS's Framework for Health Equity: expansion of collecting, using, and analyzing standardized data, assessing causes of disparities, and building capacity of healthcare organizations to reduce disparities

The importance of identifying, diagnosing, and treating malnutrition continues to grow. Further, the relationship between malnutrition and food insecurity and its effects on health equity has been proven to be of importance and continues to be studied. It is important to ensure CMS's inclusion of this measure in the 2024 Hospital Inpatient Quality Reporting Program which can help address the overarching burden that malnutrition has on patients and the healthcare system as a whole. If you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in cursive script that reads "Janna Heyman".

Janna Heyman
Chair and Director
Ravazzin center on Aging and Intergenerational Studies