



NATIONAL HISPANIC COUNCIL ON AGING

December 14th, 2023

Administrator Chiquita Brooks-LaSure
Centers for Medicare and Medicaid Services
Department of Health and Human Services, P.O. Box 8010
Baltimore, MD 21244

Action requested: Adopt the expanded Global Malnutrition Composite Score in the CMS FY 2024 Hospital Inpatient Quality Reporting Program

Dear Administrator Brooks-LaSure:

The National Hispanic Council on Aging (NHCOA) is the leading national organization working to improve the lives of Hispanic Older adults, their families, and caregivers. In 2019, according to the US Census, there were 60.6 million Hispanics in the US, making people of Hispanic origin the nation's largest ethnic/racial community of color. We have been a strong voice dedicated to promoting, educating, and advocating for research, policy, and practice in the areas of economic security, health, and housing, for over 50 years. Today we are responding to the CMS call for public comments on the FY 2023 Measures Under Consideration List. **Specifically, we urge CMS to include the expanded Global Malnutrition Composite Score (GMCS) measure on the FY 2024 Hospital Inpatient Quality Reporting Program.**

As a health equity measure, the GMCS can help address food insecurity which contributes to malnutrition. We applaud that last year CMS adopted the GMCS for adults age 65 and older in its Hospital Inpatient Prospective Payment System. However, food insecurity and malnutrition risk can occur at any age and this is why the GMCS on the FY 2023 MUC List was been expanded to all adults (age 18 and over). Hispanics have the highest level of food insecurity and hunger of any group in the nation. Almost one-quarter (23.7%) of Hispanic households face food insecurity, with 6.7% of these households facing very high food insecurity ([Cruz 2015](#)). CMS adoption of the expanded GMCS will help healthcare institutions identify and intervene for food insecurity and thus improve the lives of Hispanic families and caregivers.

Often Hispanic/Latinx caregivers are the sole caregivers for their loved ones. They have higher caregiving burden and lower overall health status and social/physical functioning compared to non-Hispanic caregivers ([Sehar et al 2023](#)). These factors can place caregivers at higher risk for health and nutrition concerns like malnutrition, underscoring the importance of routinely screening and intervening for malnutrition with all adult hospital patients. The updated GMCS provides a framework for "quality improvement processes to

NHCOA

NATIONAL HISPANIC COUNCIL ON AGING

help promote high quality standards of nutrition care, improve length-of-stay and reduce health care costs and readmissions, while addressing malnutrition, health equity and nutritional care as a human right” ([Ojeda et al 2023](#)).

In keeping with our commitment to improve Hispanic older adult’s health, we continue to support and advocate for policies regarding nutrition not just older adults but also for their families and caregivers. We believe the expanded GMCS can help support this goal and ask CMS to take action and adopt the expanded GMCS in its FY 2024 Hospital Inpatient Quality Reporting Program.

Sincerely,

Yanira Cruz, DrPH, MPH
President & CEO



202-347-9733



2201 12th St. NW, Suite 101
Washington, DC 20009



nhcoa@nhcoa.org



www.nhcoa.org