

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

**RE: Include NQF #3592e Global Malnutrition Composite Score for the FY 2024 Hospital Inpatient Quality Reporting Program**

Dear Ms. Brooks-LaSure:

The National Hispanic Medical Association (NHMA) is pleased to have the opportunity to submit comments in response to the recent release of the FY 2023 Measures Under Consideration List. NHMA is a non-profit association representing the interests of 50,000 licensed Hispanic physicians in the US and is dedicated to empowering Hispanic physicians to be leaders who will help eliminate health disparities and improve the health of Hispanics. It is from this perspective that we are writing. Specifically, an expansion of the health equity-related Global Malnutrition Composite Score (GMCS) quality measure to all adults 18 years and older was part of the 2023 MUC list. **We urge CMS to include the expanded GMCS in a FY 2024 Hospital Inpatient Quality Reporting Program.**

Malnutrition is linked to poor health outcomes, including readmissions, disability, and increased healthcare costs.<sup>1</sup> While all segments of the population may be at risk for malnutrition, the risk is higher in communities of color and this can lead to health disparities.<sup>2</sup> Food insecurity is closely linked to nutrition and nutrition care access. We participated in the *2022 White House Conference on Hunger, Nutrition and Health* which described multiple impacts of food insecurity and diet-related diseases on individual and societal costs, including poorer mental and overall health as well as increased healthcare costs.<sup>3</sup> Food insecurity is an ongoing problem for the US Hispanic population, who is 2 times more likely to experience food insecurity than White, non-Hispanic Americans.<sup>4</sup>

Implementation of the GMCS is an interdisciplinary process that starts with nutrition screening and assessment. The physician is then responsible for malnutrition diagnosis. Indeed, physicians can play a pivotal role in addressing malnutrition and promoting health equity through improved access to nutrition care.<sup>2</sup> CMS adoption of the expanded GMCS into a hospital quality program supports this role. There is evidence that with the improved malnutrition care workflow resulting from implementation of the GMCS, a hospital's malnutrition diagnosis rate can increase and enable the institution to better address patient malnutrition needs.<sup>5</sup>

Reporting on the GMCS imposes minimal burden on hospitals. The GMCS is based on the standard malnutrition care process already in place in hospitals and the data elements are in defined data fields routinely used in care delivery and documented in the electronic health record. Further, we believe burden would not increase by expanding the patient population to all adults, as no additional documentation or infrastructure would be needed to reflect performance.

Finally, the GMCS is aligned with the CMS Framework for Health Equity, including supporting collection and reporting malnutrition data to address inequities and close gaps in care as well as building health care organizations' capacity to reduce health and healthcare disparities. The tools and resources readily exist to identify and intervene for malnutrition and food insecurity. CMS adoption of the expanded GMCS into the FY 2024 Hospital Inpatient Reporting Program will help hospitals leverage those tools and resources for improved patient and health equity and outcomes.

Sincerely,

Elena Rios, MD, MSPH, MACP  
President & CEO, NHMA

<sup>1</sup>The Malnutrition Quality Collaborative. *National Blueprint: Achieving Quality Malnutrition Care for Older Adults*, 2020 Update. Available at: <https://defeatmalnutrition.today/advocacy/blueprint/>

<sup>2</sup>Gonzalez AL et al. Promoting health equity for the Hispanic population through improved access to malnutrition screening and intervention. *Journal of the National Hispanic Medical Association*, 1(1):39-50, 2023.

<sup>3</sup>The White House. Biden-Harris Administration National Strategy on Hunger, Nutrition, and Health, 2022. Available at: <https://www.whitehouse.gov/wp-content/uploads/2022/09/White-House-National-Strategy-on-Hunger-Nutrition-and-Health-FINAL.pdf>.

<sup>4</sup>Feeding America. Food insecurity in Latino communities. 2023. Available at: <https://www.feedingamerica.org/hunger-in-america/latino-hunger-facts>.

<sup>5</sup>Bechtold ML et al. Interprofessional implementation of the Global Malnutrition Composite Score quality measure. *Nutrition in Clinical Practice*, 38(5):987-997, 2023.