

defeat malnutrition today

February 16, 2024

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

The Defeat Malnutrition Today coalition appreciates the opportunity to submit a comment **in support of the proposal to adopt** the Global Malnutrition Composite Score (GMCS) for all adults ages 18 or older in the FY2023 MUC List (MUC2023-114).

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. This is a great opportunity to be more inclusive and identify malnutrition and food insecurity earlier.

In its recent committee meeting, the Pre-Rulemaking Review (PRMR) committee identified areas for consideration with corresponding conditions for expansion of the GMCS to include all adults ages 18 and over, **including increase involvement of more patient groups in further work in this measure**. Defeat Malnutrition Today is a coalition of [over 120 members](#), committed to defeating older adult malnutrition across the continuum of care. We speak for a diverse alliance of stakeholders and organizations, including caregiver and patient groups such as the National Alliance for Caregiving, Caregiver Action Network, SAGE - Services and Advocacy for GLBT Elders, and Alzheimer's Foundation of America. We can speak to engagement of groups like our members the National Hispanic Council on Aging, The National Caucus and Center on Black Aging, and the National Indian Council on Aging. We had opportunities to engage as the initial measure was developed and discuss the measure with our members.

As we previously commented, research showing the importance of identifying, diagnosing, and treating malnutrition at all ages continues to grow and early identification of malnutrition can allow for healthy aging. 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. The GMCS mirrors the well-established clinical workflows of RDNs in the provision of malnutrition care to adults in the acute care setting, and this measure captures data on the high-quality malnutrition care already being provided by RDNs. Most hospital inpatient screening policies include rescreening if the initial screen is negative for malnutrition risk to capture those who may hospital-acquired malnutrition. The existing GMCS eCQM for 65+ was one of the first quality reporting programs focused on nutrition care or malnutrition performance measures. It has been extensively tested and shown that [adopting evidence-based malnutrition care best practices](#) is associated with reduced costs and improved patient outcomes.

We fully support CMS including this measure in the 2024 Hospital Inpatient Quality Reporting Program, given the overarching burden that malnutrition has on patients and the healthcare system. Thank you for considering our comments. Please let us know if we can provide you with any further information. You may reach me at rblancato@matzblancato.com

Sincerely,



Bob Blancato

National Coordinator, Defeat Malnutrition Today