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December 26, 2024

Partnership for Quality Measurement
Comments in Support of MUC

Submitted Electronically to: <https://p4qm.org/media/3166>

Dear MUC Evaluation Committee:

WeightWatchers appreciates the opportunity to provide a public comment in support of adopting the MUC2024-028 Screening for Abnormal Glucose Metabolism in Patients at Risk of Developing Diabetes (Screening).

Screening for prediabetes and undiagnosed type 2 diabetes is critical to improving both prevention and care of type 2 diabetes. The Centers for Disease Control and Prevention (CDC) estimates that approximately 97.6 million American adults have prediabetes.¹ They note that more than 80% of adults with prediabetes are not aware that they have the condition. Additionally, the CDC estimates 38.4 million adults have diabetes with 8.7 million being undiagnosed.¹ The prevalence of prediabetes and diabetes also increases with age.¹ Early identification of both prediabetes and type 2 diabetes is crucial so that patients can receive effective interventions to decrease the likelihood of disease progression or complications.

The Screening measure, stewarded by the American Medical Association (AMA), is based on the United States Preventive Services Task Force (USPSTF) 2021 Prediabetes and Type 2 Diabetes: Screening recommendation.² "The USPSTF recommends screening for prediabetes and type 2 diabetes in adults aged 35 to 70 years who have overweight or obesity."² In addition, adoption of the measure would implement a recommendation from the National Clinical Care Commission (NCCC) to Congress and the Secretary of Health and Human Services (HHS), which called for adopting the Screening measure developed by the American Medical Association as part of a strategy to prevent diabetes among high-risk individuals.³

This measure would be recognized by physicians as clinically appropriate and meaningful for improved patient care, because it assists them to implement USPSTF and expert panel recommendations. Based on research conducted to develop the measure, it targets an appropriate patient population and is feasible to implement by most health care organizations; most organizations routinely capture the data elements in their EHR. Additionally, this measure is both valid and reliable as demonstrated in the testing results.

WeightWatchers believes that screening for abnormal glucose is an important preventive service and is reasonable to include in accountability programs. The measure would lead to an uptake in participation in CDC recognized Diabetes Prevention Programs by those with pre-diabetes. Currently, these evidence based programs are underutilized and only with improved screening and referrals will uptake lead to measurable improvement in population health. WeightWatchers operates a CDC recognized Diabetes

Prevention Program with demonstrated excellent outcomes. We find that provider screening and referral are key to enrollment.

Please adopt MUC2024-028 Screening for Abnormal Glucose Metabolism in Patients at Risk of Developing Diabetes (Screening). If you have any questions please do not hesitate to reach me at Jacquie.Cooke@WW.com.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jacquie', written over a faint circular stamp or watermark.

Jacqueline Cooke
Chief Legal and Regulatory Officer and Secretary

References:

- ¹. CDC. (2024, July 23). National Diabetes Statistics Report. Retrieved November 15, 2024, from Diabetes website: <https://www.cdc.gov/diabetes/php/data-research/>
- ². US Preventive Services Task Force. (2021). Screening for Prediabetes and Type 2 Diabetes: US Preventive Services Task Force Recommendation Statement. JAMA, 326(8), 736–743. <https://doi.org/10.1001/jama.2021.12531>
- ³. Report to Congress on Leveraging Federal Programs to Prevent and Control Diabetes and Its Complications. National Clinical Care Commission, 2021, <https://health.gov/about-odphp/committees-workgroups/national-clinical-care-commission/report-congress>.