



# HEALTHCARE NUTRITION COUNCIL

Improving outcomes through awareness and action

*Submitted via NQF Portal*

National Quality Forum  
1099 14<sup>th</sup> Street NW  
Suite 500  
Washington, DC 20005

April 8, 2022

## **Re: Rural Health Core Measure Set Draft Environmental Scan**

To The National Quality Forum:

The Healthcare Nutrition Council (HNC) is providing comments on the Rural Health Core Measure Set Draft Environmental Scan. HNC is an association representing manufacturers<sup>1</sup> of enteral nutrition (EN) formulas and oral nutrition supplements (ONS), including those categorized as medical foods, and parenteral nutrition (PN). Our mission is to improve patient outcomes by advancing nutrition policies and actions that raise awareness and optimize access of essential nutrition support therapies across the continuum of care.

HNC is pleased that the National Quality Forum (NQF) is reconvening the Rural Health Advisory Group to discuss potential updates to the core set of rural-relevant measures. As NQF is aware, addressing malnutrition is essential to improving overall healthcare and may ultimately reduce the economic burden incurred when caring for the oldest and sickest Americans.<sup>i,ii</sup> Disease-related malnutrition can manifest in patients across all spectrums of body mass index, ranging from under to overweight individuals, including those presenting with obesity. Malnutrition often is associated with acute and chronic diseases and injury, such as cancer, stroke, infection, trauma, and surgical procedures. Large-scale studies have shown that as many as half of hospitalized patients and 35% to 85% of older long-term care residents are undernourished.<sup>iii,iv,v,vi</sup>

For these reasons, it is important that robust nutrition measures are included in the Centers for Medicare and Medicaid Services (CMS), and others, quality reporting programs. HNC therefore offers its strong support for the addition of the Global Malnutrition Composite Score (NQF# 3592e), which is listed as a potential addition in Appendix C of the Draft Environmental Scan, to the core set of rural-relevant measures.

Additionally, HNC is encouraged to see health equity included as an emerging area in Appendix D of the Draft Environmental Scan, and strongly recommends that NQF include nutritional status within this topic category. Nutritional status, and by consequence malnutrition, is often influenced by a variety of social determinants of health (SDoH). According to the World Health Organization (WHO), SDoH are “the conditions in which people are born, grow, work, live, and age, and the wider set of forces and systems shaping the conditions of daily life. These forces and systems include economic policies and systems, development agendas, social norms,

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<sup>1</sup> HNC members are Abbott Nutrition, Nestle Healthcare Nutrition, and Nutricia North America.



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social policies and political systems.”<sup>vii</sup> In many cases SDoH will have a drastic impact on the availability and quality of foods, how those foods can be prepared and consumed, and what foods will be commonly consumed as staple parts of the diet. As a result, SDoH shape a population’s nutritional status and may result in certain populations, such as the elderly, disabled, and the poorest segments of society, becoming malnourished.

HNC thanks NQF for allowing us the opportunity to comment on potential updates to the core set of rural-relevant measures. Should you wish to discuss these comments further, please contact Justine Coffey, Healthcare Nutrition Council, at [jcoffey@healthcarenutrition.org](mailto:jcoffey@healthcarenutrition.org).

Sincerely,

A handwritten signature in black ink that reads "Robert Rankin". The signature is written in a cursive, flowing style.

Robert Rankin  
Executive Director

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<sup>i</sup> Tyler R, Barrocas A, Guenter P, Araujo Torres K, Bechtold ML, Chan LN, Collier B, Collins NA, Evans DC, Godamunne K, Hamilton C, Hernandez BJD, Mirtallo JM, Nadeau WJ, Partridge J, Perugini M, Valladares A; ASPEN Value Project Scientific Advisory Council. Value of Nutrition Support Therapy: Impact on Clinical and Economic Outcomes in the United States. *JPEN J Parenter Enteral Nutr.* 2020 Mar;44(3):395-406. doi: 10.1002/jpen.1768. Epub 2020 Jan 29. PMID: 31994761.

<sup>ii</sup> Mullin GE, Fan L, Sulo S, Partridge J. The Association between Oral Nutritional Supplements and 30-Day Hospital Readmissions of Malnourished Patients at a US Academic Medical Center. *J Acad Nutr Diet.* 2019 Jul;119(7):1168-1175. doi: 10.1016/j.jand.2019.01.014. Epub 2019 Apr 4. PMID: 30954446.

<sup>iii</sup> Robinson MK, Trujillo EB, Mogensen KM, et al: Improving nutritional screening of hospitalized patients: The role of prealbumin. *JPEN J Parenter Enteral Nutr.* 2003 27:389-395.

<sup>iv</sup> Chima CS, Barco K, Dewitt MLA, et al: Relationship of nutritional status to length of stay, hospital costs, discharge status of patients hospitalized in the medicine service. *J Am Diet Assoc* 1997 97:975-978.

<sup>v</sup> Braunschweig C, Gomez S, Sheean PM: Impact of declines in nutritional status on outcomes in adult patients hospitalized for more than 7 days. *J Am Diet Assoc* 2000 100:1316-1322.

<sup>vi</sup> Crogan NL, Pasvogel A: The influence of protein-calorie malnutrition on quality of life in nursing homes. *J Gerontol A Biol Sci Med Sci* 2003 58A(2):159-164.

<sup>vii</sup> World Health Organization. Social Determinants of Health. 2019. Retrieved from [http://www.who.int/social\\_determinants/en/](http://www.who.int/social_determinants/en/)