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 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. 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.

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, economic conditions,

---

1 HNC members are Abbott Nutrition, Nestle Healthcare Nutrition, and Nutricia North America.
social policies and political systems." 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.

Sincerely,

Robert Rankin
Executive Director

---


5 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.
