



# HEALTHCARE NUTRITION COUNCIL

Improving outcomes through awareness and action

*Submitted via Partnership for Quality Measurement Portal*

Centers for Medicare & Medicaid Services  
Department of Health and Human Services  
7500 Security Boulevard  
Baltimore, MD 21244

December 20, 2023

**Re: 2023 Measures Under Consideration Comment Period for Pre-Rulemaking Measure Review – MUC2023-114– “Global Malnutrition Composite Score”**

To Whom It May Concern,

The Healthcare Nutrition Council (HNC) supports the substantial change of expanding the age from 65 years and older to 18 years and older for the Measure Under Consideration (MUC) MUC2023-114 “Global Malnutrition Composite Score” for inclusion in the Hospital Inpatient Quality Reporting Program (Hospital IQR Program) and the Promoting Interoperability Program (PI) set, beginning with the 2024 performance year. HNC is an association representing manufacturers<sup>1</sup> of enteral nutrition (EN) formulas and oral nutrition supplements (ONS), parenteral nutrition (PN) formulas, supplies and equipment. Our mission is to improve health by advancing policies that address and raise awareness of nutrition and its impact on patient outcomes and healthcare costs. Our organization aims to promote nutritional screening, diagnosis, assessment, appropriate and timely clinical nutrition interventions, as well as patient access to specialized nutrition support products and at all ages services throughout the continuum of care.

HNC supports continued and expanded application of the Global Malnutrition Composite Score (MUC2023-114) measure in the Hospital IQR Program and IP set. As CMS is aware, malnutrition is widely recognized as having a significant role in health outcomes and healthcare costs. Addressing malnutrition is essential to improving quality of care and outcomes for all patients. To just name a few important considerations, malnutrition has been shown to lead to increased complications, longer hospitalizations and more readmissions for patients being treated in facility settings. In addition, malnutrition is a risk factor for other adverse clinical events, such as falls, and is also tied to higher rates of stroke, heart failure, cancer, and COPD. Malnourished patients experienced up to 5x risk of in-hospital mortality, up to 2x higher hospital costs, up to 2x longer length of stay, and 55% higher readmissions than discharges without malnutrition. 30-day readmissions among non-maternal and non-neonatal inpatient stays related to malnutrition are 25.8% for 18–39-years of age and 26.3% for 40–64 years of age.<sup>2</sup>

Nutritional status, and by consequence malnutrition, is often influenced by a variety of social determinants of health (SDOH). According to WHO, SDOHs 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, social policies and political systems.”<sup>3</sup> In many cases, SDOHs 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, SDOHs 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.

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

<sup>2</sup> Barrett ML, Bailey MK, Owens PL. Non-maternal and Non-neonatal Inpatient Stays in the United States Involving Malnutrition, 2016. Last Accessed December 6, 2023. U.S. Agency for Healthcare Research and Quality. Available: [https://www.hcup-us.ahrq.gov/reports/HcupMalnutritionHospReport\\_083018.pdf](https://www.hcup-us.ahrq.gov/reports/HcupMalnutritionHospReport_083018.pdf).

<sup>3</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/)



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It is important that CMS and others include robust nutrition measures in its quality reporting programs for adults, including and especially the IQR Program. HNC therefore offers its strong support for the addition of the Global Malnutrition Composite Score in the Hospital IQR program and PI set to all adults aged 18 years and over. HNC also encourages all stakeholders to continue advancing other nutritional-related measures for inclusion in CMS and other quality programs, and we stand ready to work with all stakeholders on this important initiative.

HNC thanks CMS for allowing us the opportunity to provide feedback on the inclusion of these measures. Should you wish to discuss these comments further, please contact Sydni Arnone at [sarnone@healthcarenutrition.org](mailto:sarnone@healthcarenutrition.org).

Sincerely,

A handwritten signature in black ink that reads "Robert Rankin". The signature is written in a cursive style with a large, prominent "R" at the beginning.

Robert Rankin  
Executive Director