



June 12, 2017

Seema Verma  
Administrator  
Centers for Medicare & Medicaid Services  
Department of Health and Human Services  
Hubert H. Humphrey Building, Room 445-G  
200 Independence Avenue, SW  
Washington, DC 20201

**RE: FY 2018 Medicare RE: FY 2018 Medicare Hospital Inpatient Prospective Payment System (IPPS) and Long Term Acute Care Hospital (LTCH) Prospective Payment System Proposed Rule, and Request for Information CMS-1677-P**

Dear Administrator Verma:

The Gary and Mary West Health Institute, a nonprofit, nonpartisan applied medical research organization dedicated to enabling successful aging for seniors, appreciates the opportunity to provide comment on the Centers for Medicare and Medicaid Services' (CMS), "FY 2018 Medicare Hospital Inpatient Prospective Payment System (IPPS) and Long Term Acute Care Hospital (LTCH) Prospective Payment System Proposed Rule, and Request for Information (CMS-1677-P)." We support the proposal to adopt malnutrition electronic clinical quality measures (eCQMs) and a potential malnutrition composite measure for future inclusion in the Hospital Inpatient Quality Reporting (IQR) and Medicare and Medicaid Electronic Health Record (EHR) Incentive Programs.

The proposed rule for malnutrition measures consists of the following four measures:

- Completion of a Malnutrition Screening within 24 Hours of Admission (MUC16-294);
- Completion of a Nutrition Assessment for Patients Identified as At-Risk for Malnutrition within 24 Hours of a Malnutrition Screening (MUC16-296);
- Appropriate Documentation of a Malnutrition Diagnosis (MUC16-344); and
- Nutrition Care Plan for Patients Identified as Malnourished after a Completed Nutrition Assessment (MUC16-372).

Use of the four malnutrition eCQMs will incentivize the adoption of evidence-based malnutrition care best practices to reduce costs and improve patient outcomes. **We urge immediate adoption of all four malnutrition eCQMs into the Hospital IQR Program in FY 2018 and we agree with adoption of a malnutrition composite eCQM as soon as feasible.**

We applaud CMS's recognition of the impact of malnutrition on older adult health and outcomes as well as the consideration of the clinically-relevant malnutrition eCQMs that should be considered for adoption into the Hospital IQR Program as soon as feasible. As CMS notes in the Proposed Rule, "malnutrition is associated with many adverse outcomes."



Malnutrition has been associated with a number of chronic health problems, such as type 2 diabetes, high blood pressure, heart disease, stroke and osteoporosis. One third to half of U.S. adults are malnourished or at risk for malnourishment upon admission to the hospital—and longer hospital stays are associated with worsening nutritional status. Poverty and food insecurity greatly increase the risk of malnutrition. Conducting malnutrition assessments during an acute hospital stay and providing appropriate intervention and follow-up can lead to improved outcomes for individuals with malnutrition.

Solely funded by philanthropists Gary and Mary West, the Gary and Mary West Health Institute is part of West Health, which includes the nonprofit and nonpartisan Gary and Mary West Foundation in San Diego, and the Gary and Mary West Health Policy Center in Washington, D.C. These organizations are working together toward a shared mission dedicated to enabling seniors to successfully age in place with access to high-quality, affordable health and support services that preserve and protect their dignity, quality of life and independence. Improving the identification, intervention, and follow-up for seniors identified with malnutrition is critical to promoting well-being and aging in place.

Additionally, in 2016, Gary and Mary West established the Gary and Mary West Senior Dental Center, a nonprofit, integrated community dental center that links high-quality and affordable oral healthcare with a suite of nutrition, case management and wellness services offered to low-income seniors through Serving Seniors' Gary and Mary West Senior Wellness Center in downtown San Diego.

Further underscoring their commitment to reduce malnutrition among low-income seniors, the Wests launched a Senior Emergency Care Unit at UC San Diego Health, which enhances care for older adults and enables a multi-year medical research initiative in partnership with the West Health Institute. It offers geriatric medicine, acute care screening, urgent care, case management, and social and psychiatric care with malnutrition screening and intervention included in the new protocols. It also serves as a leading site for medical education and workforce training to advance senior-appropriate acute care across the nation.

We thank CMS for the opportunity to provide comments. Should you have any questions, please contact me at [vvolpe@westhealth.org](mailto:vvolpe@westhealth.org) or (202) 729-8575.

Sincerely,

A handwritten signature in black ink that reads "Valerie Volpe".

Valerie Volpe  
Vice President, Government Affairs