
April 26, 2018

Bob Blancato
rblancato@matzblancato.com

Dear Mr. Blancato:

Thank you for your letter and for expressing your interest in adding measures of malnutrition and nutrition to the Hospital Inpatient Quality Reporting (IQR) and the Hospital Value-Based Purchasing (VBP) Program. Improving patient outcomes is a Centers for Medicare & Medicaid Services (CMS) priority, and we agree that understanding determinants for health such as malnutrition among beneficiaries is an important issue to support.

One example of such efforts, as you mentioned in your letter, is we have sought public comment on the following Academy of Nutrition and Dietetics electronic clinical quality measures in the Final Rule on Hospital Inpatient Prospective Payment System for Acute Care Hospitals/Quality Reporting Requirements for Fiscal Year (FY) 2018 (see 82 Fed. Reg. 38378-38381, dated August 14, 2017). CMS also has held several meetings with the measure steward, encouraging the development of these separate measures into a single composite measure:

- Nutrition Care Plan for Patients Identified as Malnourished after a Completed Nutrition Assessment
- Appropriate Documentation of a Malnutrition Diagnosis
- Completion of a Nutrition Assessment for Patients Identified as At-Risk for Malnutrition within 24 Hours of a Malnutrition Screening
- Completion of a Malnutrition Screening within 24 Hours of Admission

CMS has received public comment feedback on the above malnutrition measures and is reviewing them based upon the new Meaningful Measures Initiative:

<https://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/QualityInitiativesGenInfo/MMF/General-info-Sub-Page.html>.

This initiative provides a framework to evaluate both existing measures in our programs but also to evaluate new measures which may fill these gaps. In addition, a key priority of our administration is to focus on measures that are higher value, such as outcome measures. CMS will continue efforts to receive stakeholder input to further improve the Meaningful Measures Framework, work across CMS components to implement the Framework, and evaluate current measure sets to inform measure development.

With the publication of our upcoming FY 2019 Inpatient Prospective Payment System Proposed Rule, we plan to propose several changes to our program measures. We will continue to consider the public comments we received during FY 2018 rule and engage the measure steward as we consider inclusion of these measures in the future.

As specified by the Social Security Act, measures for the Hospital VBP Program must first be implemented in the Hospital IQR Program and publicly reported on *Hospital Compare* for at least one year prior to the beginning of a Hospital VBP Program performance period.

We also appreciate your interest in the 2018 Healthy Aging Summit and your continued involvement in the Healthy People 2030 goals as they develop. Multiple federal agencies are currently involved in the developmental framework, and we encourage you to visit the Healthy People 2020 website for updated status reports: <https://www.healthypeople.gov/2020/topics-objectives/topic/nutrition-and-weight-status>

Thank you for your attention to this important public health issue and for your recommendations on how we might improve care for our beneficiaries.

Sincerely,

A handwritten signature in black ink, appearing to read "Kate Goodrich".

Kate Goodrich, MD, MHS
Director, Center for Clinical Standards and Quality
Chief Medical Officer
Centers for Medicare & Medicaid Services