

# defeat **malnutrition** today

January 31, 2023

Chiquita Brooks-LaSure, Administrator  
Centers for Medicare and Medicaid Services (CMS)  
Department of Health and Human Services  
7500 Security Boulevard  
Baltimore, MD 21244-1850

Re: CMS-9898-NC

Comment submitted electronically at Regulations.gov

Dear Administrator Brooks-LaSure,

The Defeat Malnutrition Today (DMT) coalition appreciates the opportunity to comment on the Centers for Medicare and Medicaid Services' (CMS) request for information (RFI) on issues related to the Essential Health Benefits (EHB) under the Patient Protection and Affordable Care Act. **Specifically, DMT comments in support of significantly expanding nutrition related EHB for patients nationwide.**

Defeat Malnutrition Today is a coalition of over 120 members committed to defeating older adult malnutrition across the continuum of care. We are a diverse alliance of stakeholders and organizations working to achieve a greater focus on malnutrition screening, diagnosis, and intervention through regulatory and/or legislative change across the nation's health care system.

Your RFI asks about ways that EHB could "address nutrition-related health conditions for the American population." Though our coalition focuses on older adult malnutrition, we are concerned about poor nutrition across the lifespan, particularly in the "younger old" who are not yet eligible for Medicare, thus needing private health insurance coverage. There are many ways that EHB could provide improved nutrition care for patients across the lifespan.

We already know that poor nutrition ultimately is expensive to taxpayers and health plans alike. [One analysis](#) estimates the economic cost of the "four nutrition-related chronic diseases [heart disease, obesity, type 2 diabetes and cancer] among 18 to 64-year-olds at \$16 trillion from 2011-2020 (or nearly 9 percent of gross domestic product annually) after accounting for direct health care costs, lost productivity, and lost wages."

Insurance coverage of registered dietitian nutritionists (RDNs) and other nutrition care professionals should be improved; for example, many insurance plans (including Medicare) do not cover "medical nutrition therapy," where patients receive individualized care from an RDN, for more than a handful of chronic conditions.

Coverage of medically tailored meals (MTM) might be another EHB to consider. Currently, many Medicare Advantage plans cover home delivered MTM for certain patients with chronic illness (as Special Supplemental Benefits for the Chronically Ill [SSBCI], created through the Chronic Care Act). These MTM could have great benefits for younger people with specific nutrition-related chronic conditions. Community providers across the country already make and deliver MTM to patients young

and old with HIV-AIDS, cancer, heart failure, kidney disease and other serious conditions; they would be a ready-made network of care for plans to partner with. Having this as a universal benefit for patients could improve health care outcomes across the age spectrum.

Finally, we encourage CMS to consider adding produce prescriptions as EHB. Produce prescriptions allow patients to access fruits and vegetables at low or no cost to them. For people with certain nutrition-related chronic conditions who are low-income, assistance purchasing healthy foods could help prevent their condition from progressing further.

Ultimately, nutrition care also improves health equity, another key priority of this Administration. For example, as I wrote in a November 2021 [Health Affairs Forefront article](#), “Non-Hispanic Black patients were more likely to be at risk for malnutrition, have a diagnosis of malnutrition, and experience a higher 30-day readmission rate. These disparities among higher-risk groups could be addressed by tailored interventions.” These interventions will save lives.

Thank you for considering our comments. Please let us know if we can provide you with any further information. You may reach me at [rblancato@matzblancato.com](mailto:rblancato@matzblancato.com).

Sincerely,



Bob Blancato  
National Coordinator  
Defeat Malnutrition Today