

defeat **malnutrition** today

November 15, 2022

Agency for Healthcare Research and Quality (AHRQ), HHS

Submitted electronically to MCC@ahrq.hhs.gov

RE: 87 FR 56950, Person-Centered Care Planning for Multiple Chronic Conditions (MCC)

Dear Agency for Healthcare Research and Quality,
Defeat Malnutrition Today (DMT)* appreciates the opportunity to comment on Person-Centered Care Planning for Multiple Chronic Conditions (MCC), which seeks feedback on ways to strengthen the comprehensive, longitudinal, person-centered care planning for people at risk for or living with MCC across settings of care and barriers and facilitators to implementation. We recommend you consider nutrition as an integral part of person-centered care, starting with screening for malnutrition.

Most older adults have more than one chronic condition, and older adults of color, including [American Indian](#) and [Black](#) populations, tend to have higher rates of specific nutrition-related chronic diseases such as diabetes and heart disease. Older adults and those with MCC are at increased risk for poor nutrition, with a Congressional Research Service [report on malnutrition in older adults](#) noting “malnutrition affects 35% to 50% of older residents in long term care facilities and as many as 60% of hospitalized older adult patients in the United States.”

Including nutrition evaluations and services as part of older adult healthcare is recommended to avoid and minimize the effects of nutrition-related disease. Defeat Malnutrition Today strongly supports referrals of those identified by malnutrition/other health screenings to the appropriate professionals, as stated in our [National Blueprint: Achieving Quality Malnutrition Care for Older Adults](#). Referrals of those identified by food insecurity, malnutrition, and other social determinants of health screenings can easily be referred in primary care to the appropriate professionals and community nutrition programs/services. This can improve older adults’ access to needed care and follow-up services in a timely and efficient manner and lead to better health outcomes.

A recent NIH report focused on nutrition care in cancer, which is a persistent chronic disease. In [Pathways to Prevention \(P2P\) Program: Nutrition as Prevention for Improved Cancer Outcome](#), the independent panel recommended “baseline screening for malnutrition risk using a validated instrument following cancer diagnosis and repeated screening during and after treatment to monitor nutritional well-being.” Furthermore, the 2020 Dietary Guidelines for Americans recognized that older adults are at risk for both disease and malnutrition.

Education is an additional piece for developing person-centered care for MCC. A recent National Academies of Science, Engineering, and Medicine [Global Forum on Innovation in Health Professional Education](#) discussed addressing the needs of an aging population through health professional education. Communication breakdown is common when educating patients on their care and many organizations have developed more understandable patient education materials. To address this, DMT developed a [resource page designed for consumers and patients](#).

**Defeat Malnutrition Today is a coalition of over 100 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.*

Thank you for considering our comments. If you have any questions or need further information, please contact our Policy Director Meredith Whitmire at mponder@matzblancato.com.

Sincerely,

Bob Blancato
National Coordinator
Defeat Malnutrition Today