July 22, 2019

Public Comment for Healthy People 2030
Submitted electronically via HP2030@hhs.gov

To the Advisory Committee:

Defeat Malnutrition Today recently had the opportunity to present oral comments to the Dietary Guidelines Advisory Committee during their July 10-11, 2019 meeting. We are sharing our comments (attached) with the Healthy People 2030 Advisory Committee because we believe it is important to link our nation’s health goals with U.S. dietary guidelines and government nutrition programs, particularly for the older adult population.

Defeat Malnutrition Today is a diverse coalition of over 90 national, state, and local organizations, including groups such as the Academy of Nutrition and Dietetics, the American Society of Nutrition, and the American Society for Parenteral and Enteral Nutrition, who are committed to defeating older adult malnutrition across the continuum of care. We are focused on advancing this fight through federal and state policy and advocacy. This letter builds on an oral statement (September 7, 2017) and written comments (January 17, 2019) provided to the Healthy People 2030 Advisory Committee on the need for an objective addressing older adult malnutrition.

Why Is A National Health Goal on Older Adult Malnutrition Needed?
Older adult malnutrition continues to be a growing crisis in America today—one in two older adults face the threat of malnourishment. Malnutrition is pervasive, costly, and causes patients to feel worse and heal slower; however, it has not yet been addressed by a systematic, consistent approach throughout the continuum of care, including in our communities. We support Healthy People 2030’s overarching goal to “attain healthy, thriving lives and well-being, free of preventable disease, disability, injury and premature death” and we believe that for older adults, defeating malnutrition is necessary to achieve this goal.

Older adult malnutrition has been recognized at the global level; the World Health Organization (WHO) has specifically identified in Goal 2.2 of its Sustainable Development Goals to end all forms of malnutrition by 2030, including addressing the nutritional needs of older persons.¹ Further, WHO has outlined interventions to help address malnutrition through its Integrated

¹ https://www.un.org/sustainabledevelopment/hunger/
Care for Older People guidelines, where malnutrition is a focus for one of the 13 recommendations for managing declines in intrinsic capacity for older people.\(^2\)

*Dietary Guidance to Help Address the Problem Is Being Considered*

The U.S. Dietary Guidelines Advisory Committee has developed a focus question on the relationship between dietary patterns consumed and sarcopenia. As our testimony to the Dietary Guidelines Advisory Committee stressed, malnutrition is a leading cause of sarcopenia, and many cases of severe sarcopenia can be prevented with proper diet (particularly adequate protein) and exercise.

*Nutrition Program Reauthorization Is Underway*

Through the Older Americans Act (OAA), the federal government helps fund our nation’s congregate and home delivered meals programs, which support the nutrition needs of millions of older adults every day. We are advocating for malnutrition screening to be a priority in these programs, which are critical to older adult health and well-being as well as to reduced health disparities.

In summary, our nation is at a critical juncture right now as it develops national health goals, drafts nutrition guidance, and considers the reauthorization of older adult nutrition programs. There is a unique opportunity to align these objectives, advice, and resources to promote healthy aging and help defeat malnutrition. This will go a long way to support Healthy People 2030’s overarching goal to “create social, physical, and economic environments that promote attaining full potential for health and well-being for all.”

Thank you for considering our comments. If you would like further information, please reach out to our Policy Director Meredith Whitmire at mponder@matzblancato.com.

Sincerely,

Bob Blancato
National Coordinator
Defeat Malnutrition Today

Attachment: Defeat Malnutrition Today Oral Comments—Second Meeting, 2020-2025 Dietary Guidelines Advisory Committee

\(^2\) https://www.who.int/ageing/health-systems/icope/evidence-centre/ICOPE-evidence-profile-malnutrition.pdf?ua=1
Hello. I am Meredith Whitmire, Policy Director for the Defeat Malnutrition Today coalition, a group of 90 national, state and local organizations and agencies fighting older adult malnutrition.

The framework and approach outlined for the 2020-2025 Dietary Guidelines highlight the importance of guidelines to improve the nutritional intake of Americans across the lifespan. As older adults represent a growing proportion of the U.S., including dietary guidelines relevant to an aging population is important.

In fact, older adult malnutrition is a growing crisis in America today—one in two older adults face the threat of malnourishment. Malnutrition is pervasive, costly, and contributes to disability and slower recovery; however, it has not yet been addressed by a systematic, consistent approach throughout the continuum of care, including in our communities.

We were very excited to see the focus question on the relationship between dietary patterns consumed and sarcopenia. Malnutrition is a leading cause of sarcopenia, and many cases of severe sarcopenia could have been prevented with an adequate diet.

Relatedly, in your work researching nutrients of public health concern, we ask you to closely consider necessary intake of protein in older adults. Studies show that older adults need a substantially higher amount of protein to maintain their muscle mass and prevent sarcopenia, and yet the reference intakes are the same for all groups aged 14 and older, male and female. This should be reevaluated.

We are also excited that you’re studying the current prevalence of nutrition-related chronic health outcomes. In your evaluations, we ask you to consider the presence of malnutrition when you’re examining chronic health outcomes, since poor nutrition causes some conditions and exacerbates many others.

Ultimately, older adult malnutrition is preventable – but to defeat it, we must first address it. The work of the Advisory Committee can and should lead the way on this effort. Thank you for having me and thank you for your important work.