



Demetrios Kouzoukas
Principal Deputy Administrator and Director, Center for Medicare
200 Independence Avenue NW
Room 305H-02
Washington, DC 20201

Jennifer Wuggazer Lazio, F.S.A., M.A.A.A.
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Office of the Actuary
600 W. Santa Ana Blvd.
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March 6, 2020

RE: Advance Notice of Methodological Changes for Calendar Year (CY) 2021 for Medicare Advantage (MA) Capitation Rates and Part C and Part D Payment Policies – Part II

Dear Principal Deputy Administrator Kouzoukas and Director Wuggazer,

The Coalition for Kidney Health thanks the Agency for the opportunity to provide comments on the Advance Notice of Methodological Changes for Calendar Year (CY) 2021 for Medicare Advantage (MA) Capitation Rates and Part C and Part D Payment Policies – Part II.

The Coalition for Kidney Health is a multi-stakeholder group of partners working to transform the landscape of chronic kidney disease (CKD) by generating awareness of CKD, increasing screening of at-risk patients and driving forward high-quality, coordinated care focused on delaying CKD progression.

The undersigned members of the Coalition for Kidney Health are pleased that CMS has recognized the need for new measures in CKD. Quality measures that improve rates of routine testing for CKD in patients with diabetes are important because Americans with diabetes may not feel ill or notice any symptoms until the CKD is advanced. We encourage CMS to adopt the Kidney Health Evaluation Measure into the Medicare Advantage Star Ratings, replacing the current Diabetes Care – Kidney Disease Monitoring measure. The Kidney Health Evaluation Measure will drive important interventions to delay CKD and maintain kidney health in patients with diabetes by incentivizing clinicians to perform an annual kidney profile evaluation, defined by an estimated Glomerular Filtration Rate (eGFR) and a Urine Albumin Creatinine Ratio (UACR). The annual kidney profile evaluation both identifies new cases and risk stratifies existing chronic kidney disease (CKD) using eGFR blood test and uACR test as the gold-standard tests recommended by clinical practice guidelines and Healthy People 2020.

The Kidney Health Evaluation Measure is a core quality measure in CKD upon which future quality measurement efforts can build. As such, we recommend its expeditious adoption into the Star Ratings. Please direct questions to Miriam Godwin (Miriam.godwin@kidney.org).

Sincerely,

American Nurses Association
Bayer U.S.
CVS Health
National Kidney Foundation