March 31, 2020

The Honorable Chad F. Wolf Acting Secretary Department of Homeland Security 2707 Martin Luther King Jr Avenue, SE Washington, DC 20528

Peter T. Gaynor Administrator Federal Emergency Management Agency 500 C Street, SW Washington, DC 20472

Dear Acting Secretary Wolf and Administrator Gaynor:

On behalf of the 37 million American adults with kidney disease the health professionals who care for them, the American Society of Nephrology (ASN) and the National Kidney Foundation (NKF) urge you to accelerate the production and distribution of personal protective equipment (PPE) for health care professionals and vulnerable populations during this national crisis. While many local businesses and national companies have stepped up to produce PPE, and the federal government has distributed this equipment to many states with critical shortages, our organizations continue to hear from dialysis patients and kidney care professionals who are unable to gain access to these supplies.

Specifically, ASN and NKF urge you to release any remaining PPE from the Strategic National Stockpile and take all necessary steps to transition private manufacturers to meet this critical need. Further, we urge you to issue guidance that prioritizes PPE distribution to protect the more than 500,000 Americans receiving dialysis, the more than 200,000 transplant patients, and the thousands of clinicians who care for them.

People with kidney diseases, including chronic kidney disease (CKD) patients, patients on dialysis, and kidney transplant recipients, are more likely to experience serious illness or death if they contract COVID-19. These patients are both more physiologically vulnerable to coronavirus and at high risk due to the settings in which they receive care. In-center dialysis clinics, where the majority of US end-stage renal disease (ESRD) patients receive life-sustaining treatment multiple times per week, are especially high risk areas for the outbreak given the proximity of patients to each other, the hands-on requirements of staff, and the high volume of patients in a center.

Numerous federal bodies have provided guidance that highlights the importance of PPE in preventing and managing the spread of COVID-19 in dialysis facilities. The Centers for Disease Control and Prevention (CDC) guidance directs dialysis facilities to prepare to prevent and manage COVID-19 cases through a variety of PPE practices, including masking patients with respiratory symptoms and healthcare professionals use of gloves, isolation gowns, facemasks, eye protection, and N-95 or higher-level respirators, if COVID-19 is suspected. The Centers for Medicare and Medicaid Services (CMS) have recommended that dialysis centers distribute masks and other protective gear to any patient exhibiting symptoms. Similarly, CMS guidance recommends that professionals caring for dialysis patients with undiagnosed respiratory

¹ https://www.cdc.gov/coronavirus/2019-ncov/downloads/COVID-19-outpatient-dialysis.pdf

symptoms adhere to PPE standards including the use of isolation gowns, gloves, facemasks, and eye protection.

Unfortunately, the shortage of adequate supplies makes it challenging for providers to appropriately manage symptomatic patients, potentially putting other patients and staff at risk. This susceptibility is also true in other settings where kidney patients are seen, including labs, primary care settings, hospitals and other inpatient facilities.

In addition to the challenges of managing symptomatic patients, the PPE shortage limits the ability to test for COVID-19 due to the need for those performing the test to use full PPE while conducting it. As a result, testing is limited and providers and many dialysis organizations feel they must use PPE all the time rather than just when caring for confirmed cases.

ASN and NKF appreciate that both CDC and CMS provide guidance to dialysis facilities on how to manage current PPE shortages, but our organizations believe it is still necessary to release more PPE from the national stockpile and issue additional guidance to ensure that high-risk and frail patients—like dialysis and transplant patients—have priority access to life-saving personal protective equipment, along with our nation's healthcare providers.

ASN and NKF also recognize that PPE supply varies by region and request that the Federal Emergency Management Agency work with state and local authorities to ensure that high-risk populations are prioritized, particularly in areas facing a PPE shortage. As novel domestic and foreign suppliers are working to address the PPE shortage, we request that guidance on national standards is clarified to ensure patient and healthcare provider safety is not compromised.

ASN and NKF appreciate the Trump Administration's efforts to address the many challenging issues facing our country at this time, and we urge you to take these additional steps to protect our most vulnerable citizens and the healthcare providers who take care of them. More than 37 million Americans depend on your action concerning this important issue.

Thank you. If the kidney community can assist in any way, please contact ASN at rmeyer@asn-online.org or NKF at miriam.godwin@kidney.org.

Anupam Agarwal, MD, FASN

American Society of Nephrology

President

Sincerely,

Holly J. Mattix-Kramer, MD, MPH President

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National Kidney Foundation

cc: HHS Secretary Alex M. Azar, JD