



National Kidney Foundation Comments on CMS Increasing Organ Transplant Access (IOTA) Model (CMS-5544-P)

Overall Position

The National Kidney Foundation (NKF) supports the Increasing Organ Transplant Access (IOTA) Model and proposed updates, emphasizing the promise of the model to reduce kidney discard, improve patient transparency, and advance value-based care in transplantation.

NKF is especially supportive of transparency provision of the model that, if finalized, would return the transplant journey to the patient over time. NKF's support for the IOTA Model is rooted in the patient journey:

"As someone who waited eight years on the kidney transplant waitlist, I experienced firsthand how exhausting and dangerous dialysis can be. Each treatment increases my risk of complications and mortality, with studies showing that long-term dialysis is associated with higher cardiovascular events, infections, and hospitalizations. Every session reminded me that my life was on hold, and the longer I waited, the more fragile my health became. When a kidney finally became available, it was not about it being "perfect" ; it was about reclaiming my life, reducing the constant risks of dialysis, being able to contribute to the workforce again, care for my loved ones, and participate fully in my community. Patients like me want to be included in these decisions because our voices, values, and tolerance for risk directly affect the outcomes that matter most to us. Every transplant offer is more than an organ; it is a chance to restore hope, dignity, and a life worth living." *-NKF Patient Advocate*

Core Themes

- Increase the use of kidneys by introducing a shared decision-making model that improves access without sacrificing fairness or transparency.
- Improve transparency across the transplant journey with the goal of activating patients.
- Expand value-based care in kidney transplantation to align payment incentives and address organ discards and system inefficiencies, lack of coordination and navigation, and limited accountability for patient experience.

Transparency & Patient-Centered Reforms

NKF strongly supports IOTA Model policies requiring:

- Public posting and auditing of patient and donor selection criteria.
- Consolidation of selection criteria on a centralized IOTA website.
- Organ offer decline notifications to patients.
- Semiannual review of individualized organ acceptance criteria.
- Notifications when waitlist status changes

Transparency policies must be implemented in **plain language** and implemented to empower rather than overwhelm.

Summary Policy Positions

- Model metrics should drive behavior change without excessive complexity.
- Multi-payer alignment, to ensure consistent incentives across the transplant system is essential.
- We support the development of new measures addressing pre-transplant access, referral, and evaluation processes based on improved data collection.