



March 22, 2022

NKF's Public Comment

OPTN Proposal: Removal of Race from the eGFR Formula

Thank you for the opportunity to offer commentary on the Organ Procurement and Transplant Network's (OPTN) proposal to establish a race-neutral eGFR Calculation.

The National Kidney Foundation (NKF) firmly believes that individuals with kidney failure should have equal access to the transplant waitlist regardless of race. We are committed to advocating for policies that facilitate health equity; therefore, we support OPTN's proposal to remove race from the algorithms used to assess kidney function and establish eligibility for listing for a kidney transplant.

The proposed recommendation is consistent with guidance issued in September 2021 by a joint Task Force of NKF and the American Society of Nephrology (ASN). Specifically, the Task Force recommended the immediate adoption of the 2021 CKD-EPI creatinine eGFR equation, which calculates eGFR based on age, sex, and serum creatinine and does not use race. Further, the Task Force recommended using the 2021 CKD-EPI creatinine-cystatin C estimating equation when a more precise assessment of kidney function is required to determine waitlist eligibility.

Using different formulas to assess kidney function among individuals identified as "Black" or "non-Black" perpetuates racial disparities in healthcare endured by Black communities. In 2019, the United States Renal Data System (USRDS) reported that Black people experienced the highest rate of End-Stage Renal Disease (ESRD), three times more than people who are White. Despite this fact, Black individuals are less likely to be listed for transplantation. Racism has no place in medicine; race is a social construct and not a biological determinant of health and disease. Ensuring that race is removed from the algorithms for assessing kidney function and determining eligibility for transplant is crucial to creating an equitable waitlisting process.

*"As a kidney recipient and African American woman, I want to know that if I were to need another kidney in the future, my skin color wouldn't hinder my access to the transplant waitlist. The transplant process should be fair and equitable," commented an anonymous NKF Patient Advocate.*



*"I fully support removing the race variable from the eGFR calculations. As a Black patient who has collectively waited more than 14 years on the transplant list, the journey is daunting, and hope is diminished. Time is life when waiting for a life-saving transplant and losing time due to inequitable equations is unacceptable," lamented an anonymous NKF Patient Advocate.*

To foster a more just transplant process, NKF strongly supports the removal of race from all kidney function algorithms used in assessing patients and donors and urges the OPTN to follow the lead of the NKF-ASN Task Force. As a patient advocacy organization, we further encourage clinical practices that do not discriminate against any particular group during the organ procurement and transplant processes.

References:

United States Renal Data System. 2021 *USRDS Annual Data Report: Epidemiology of kidney disease in the United States*. National Institutes of Health, National Institute of Diabetes and Digestive and Kidney Diseases, Bethesda, MD, 2021.

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Sincerely,

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