## NATIONAL QUALITY FORUM

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RENAL STANDING COMMITTEE

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THURSDAY MAY 7, 2015

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The Committee met at the National Quality Forum, 9th Floor Conference Room, 1030 15th Street, N.W., Washington, D.C., at 8:00 a.m., Constance Anderson and Peter Crooks, Co-Chairs, presiding.

**PRESENT:** 

CONSTANCE ANDERSON, BSN, MBA, Northwest Kidney Centers (Co-Chair) PETER CROOKS, MD, Kaiser Permanente (Co-Chair) ISHIR BHAN, MD, MPH, Partners Healthcare, Massachusetts General Hospital LORIEN DALRYMPLE, MD, MPH, University of California Davis ELIZABETH EVANS, DNP, American Nurses Association MICHAEL FISCHER, MD, MSPH, Department of Veterans Affairs STUART GREENSTEIN, MD, Montefiore Medical Center DEBRA HAIN, PhD, APRN, ANP-BC, GNP-BC, FAANP, American Nephrology Nurses' Association LORI HARTWELL, Renal Support Network FREDERICK KASKEL, MD, PhD, Children's Hospital at Montefiore MYRA KLEINPETER, MD, MPH, Tulane University School of Medicine ALAN KLIGER, MD, Yale University School of Medicine MAHESH KRISHNAN, MD, MPH, MBA, FASN, DaVita Healthcare Partners, Inc.

LISA LATTS, MD, MSPH, MBA, FACP, LML Health Solutions and CMO, University of California Health Plan KARILYNNE LENNING, MHA, LBSW, Telligen FRANKLIN MADDUX, MD, FACP, Fresenius Medical Care North America ANDREW NARVA, MD, FACP, FASN, National Institute of Diabetes and Digestive Kidney Diseases - National Institutes of Health JESSIE PAVLINAC, MS, RD, CSR, LD, Oregon Health & Science University MICHAEL SOMERS, MD, American Society of Pediatric Nephrology, Harvard Medical School, Boston Children's Hospital DODIE STEIN, PhD, MSW, LCSW, Indiana University Health Home Dialysis BOBBI WAGER, MSN, RN, American Association of Kidney Patients JOHN WAGNER, MD, MBA, Kings County Hospital Center JOSHUA ZARITSKY, MD, Nemours/Alfred I. duPont Hospital for Children NQF STAFF: POONAM BAL, Project Manager ALEXANDRA OGUNGBEMI, Project Analyst KATHRYN STREETER, Senior Project Manager

ALSO PRESENT:

JOEL ANDRESS, PhD, Centers for Medicare and Medicaid Services AMY BECKRICH, Renal Physician=s Association CLAUDIA DAHLERUS, PhD, MA, University of Michigan BARBARA FIVUSH, MD, Johns Hopkins University\* EDWARD JONES, MD, Delaware Valley Nephrology and Hypertension JOE MESSANA, MD, University of Michigan LISA McGONIGAL, MD, MPH, QMRI PAUL PALEVSKY, MD, University of Pittsburgh\* SARAH SAMSPEL, NQF Consultant DOUG SCHAUBEL, MD, University of Michigan DALE SINGER, MHA, Renal Physicians Association

\* present by teleconference

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1	P-R-O-C-E-E-D-I-N-G-S
2	(8:02 a.m.)
3	CO-CHAIR ANDERSON: All right. Well,
4	thanks, everyone, for coming a half hour early,
5	so we can get started. We have a large agenda to
6	get through today. Yesterday thank you,
7	everyone we did make a lot of progress, but
8	we've got a lot more to do.
9	Just a reminder that we are going to
10	try and get through all of the measures. So if
11	we could keep our comments and not repeat the
12	same comments, that would be very helpful to move
13	through the agenda.
14	At the end we will have a wrap-up, and
15	we would really like to hear your comments about
16	the process and how things went.
17	Peter, do you have anything else to
18	say?
19	CO-CHAIR CROOKS: I'm still I'm up
20	first, so I have to get ready.
21	CO-CHAIR ANDERSON: Oh, you're up
22	first. Okay.

CO-CHAIR CROOKS: I'd just like to 1 2 add, again, thank you for coming in early. For those of you who enjoyed the swank Helix Hotel, 3 and happened to get charged for the full price, 4 the staff is looking into it, and we'll let you 5 know later if they were able to reverse charges 6 7 or you'll be billing it back to NQF. CO-CHAIR ANDERSON: 8 Okay. 9 CO-CHAIR CROOKS: So we will have more 10 on that later. 11 CO-CHAIR ANDERSON: All right. Our first measure is 0249, and the developers, 12 13 Claudia and Joel? You guys are already here. You're right on top of things. 14 15 DR. DAHLERUS: Okay. Good morning. 16 So I will keep the opening statement very, very brief, just because some of the things that we 17 18 discussed with the peritoneal dialysis adequacy 19 measures apply to the HD measure. 20 So the first one and the prior one being that, as you are aware, this also included 21 22 the upper threshold of 5.0 for the individual

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And as we discussed yesterday, that 1 measure. 2 will be removed. We will redo the reliability and validity testing for this measure and then 3 resubmit updated documentation. And, again, that 4 is something that is very manageable. 5 The only other thing that I wanted to 6 7 note, because I think this may have come up in some of the remarks about the measure, is the 8 9 2006 guidelines that were cited in our evidence 10 summary, and recognizing that, you know, those 11 are obviously quite a few years old. 12 However, the HD adequacy workgroup for 13 KDOQI did meet last year, and there were draft guideline updates that were released, and the 14 15 important point being really no new updates in 16 terms of a revision to the minimum Kt/V for 17 dialysis adequacy. 18 So I will just I think end my comments 19 there in the interest of time, because we also 20 have similar adequacy measures to move through, and I think a lot of the same issues apply. 21 22 Thank you.

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1	CO-CHAIR ANDERSON: All right. And,
2	Peter and Ishir, for discussion of the measure?
3	CO-CHAIR CROOKS: Yes. Would you like
4	to take the lead?
5	DR. BHAN: Sure.
6	CO-CHAIR CROOKS: Yes, please do.
7	DR. BHAN: I can kick it off? So this
8	is somewhat similar to the last measure that we
9	looked at, in that it is looking at hemodialysis
10	adequacy. It is an outcome measure using claims
11	and electronic data. But this one is at the
12	facility level as opposed to the individual
13	clinician level.
14	So just going to the evidence, there
15	is I think we went through this with the last
16	measure as well. There is the as was just
17	mentioned, there is the KDOQI guidelines from
18	2006, which had a grade A but are somewhat old.
19	There are a number of studies showing clearance
20	correlations with outcomes, and there is the hemo
21	study showing that higher clearances aren't
22	necessarily helpful, at least overall.

So I think overall the feeling was 1 2 that, you know, 1.2 is a reasonable threshold. That is sort of where things have settled out, 3 and we thought the evidence was, you know, as 4 good as it is for this kind of thing. 5 There is, you know, obviously ongoing debates about optimal 6 7 clearances, but it's as reasonable as it was for the previous measure we discussed. And we talked 8 9 about the birth threshold, but I think that has 10 been addressed. 11 CO-CHAIR CROOKS: Yes. I felt the evidence review was based on KDOQI. Well, to be 12 13 a little picky, I noticed little things -- and this gets to the issue of filling in the forms 14 15 and answering the questions, that the answers to 16 1A 7.7 and 1A 7.8 were identical. They were just 17 cut and pasted in. 18 And the second one was about harms, 19 and it really didn't address the question. 20 Again, I'm being picky, but I'd like to see the developers, you know, help us out so we don't 21 22 have -- you know, to take us down the path to see

what it is they are trying to show us. 1 2 But the evidence is grade A. There was no new evidence presented since 2006. 3 So the floor is open for other 4 comments on the evidence. 5 MS. BAL: So just a reminder, please 6 7 speak into the mic and speak loudly. This is the loudest the system can go, so please remember to 8 9 focus on that so the whole committee can hear 10 you. 11 CO-CHAIR ANDERSON: Mahesh? 12 DR. KRISHNAN: Just a clarifying 13 question. I know we said this yesterday. I just -- I'm trying to reconcile this in my mind. 14 We 15 are thinking about the evidence of the two pieces 16 as opposed to the evidence of the totality of the measure, right? Because it's a combination as 17 18 opposed to one measure. 19 We are looking at the evidence grading 20 for adult Kt/V, pediatric Kt/V, separately, as opposed to the evidence that supports the use --21 22 the combined measure.

CO-CHAIR CROOKS: This is adults only, 1 2 but it's the same --3 DR. KRISHNAN: Concept. CO-CHAIR CROOKS: Same thing. 4 CO-CHAIR ANDERSON: 5 Any other comments? Discussion? Are we ready for voting? 6 7 MS. BAL: Turn your mics off. Thank you. 8 9 So we are voting for evidence for 10 0249. The options are one, high; two, moderate; three, low; four, insufficient. And voting is 11 We do need a couple more. We're at 19, 12 open. 13 and the full committee is here, so we should have 23. 14 15 Please remember to point at me. With 16 your clicker. Well, 20 is quorum. And if everyone 17 18 has put their vote in, I don't -- okay. So the 19 results are six high, 15 moderate, zero low, zero 20 insufficient, and we can move forward to gap. CO-CHAIR ANDERSON: All right. 21 22 DR. BHAN: Okay. So for the

performance gap, and I think this is where there is going to be the most attention, and we addressed this a little bit in our last discussion with the last item, so the performance data is based on 2013 CROWNWeb and Medicare claims data.

7 And out of -- with about 5,500 facilities, the mean performance score was 93.5 8 9 percent, with a standard deviation of seven, so 10 crossing 100 percent actually. There were 11 disparities data presented, which had some significance based on the large numbers, but at 12 13 least I didn't feel were that dramatically impressive. 14

But our key comments here were -- in our call were regarding how much room for improvement there really is with a mean of 93.5 percent. I think this came up with the last HD clearance discussion as well.

20 CO-CHAIR CROOKS: Yes. I agree. I 21 have concerns about the gap in the standard 22 deviation going over 100 percent, very narrow.

1	Other thoughts?
2	DR. FISCHER: Just briefly to remind
3	everybody the similar measure that we discussed
4	at the end of the day drew data from USRDS. I
5	think there was 97 percent. It was a very
6	similar measure, just kind of furthering that up.
7	These are slightly different data sources,
8	probably different time periods. I don't
9	remember which time period that was from that
10	Paul mentioned off my head. But just going back
11	to the point about topped out.
12	CO-CHAIR ANDERSON: And the QIP data
13	shows it at 98 percent, and so it really is a
14	measure that I think we might want to put into
15	reserve as being a topped out measure. And, you
16	know, there is really very little room for
17	performance improvement.
18	Any further discussion? Call for the
19	vote.
20	MS. BAL: Okay. So we are voting on
21	gap for 0249. The options are one, high; two,
22	moderate; three, low; four, insufficient. And

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voting is open.

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2	Please look at your clicker. If
3	you're getting any sort of error, let us know.
4	Okay. The results are zero high, six
5	moderate, 16 low, one insufficient. So this
6	measure does go down on gap. We can ask the
7	committee if they would like to consider reserve
8	status.
9	Okay. I'm seeing shakes of the head
10	as yes. So let's go ahead and do a hand vote.
11	So if you would like to do reserve, put your hand
12	up, please. Okay. That's a majority. So we can
13	move forward with reliability.
14	DR. BHAN: Okay. So for reliability,
15	for the specifications, the data elements were
16	defined based on a treatment file for the
17	patients who are on dialysis, and for testing it
18	was performed using the data from 2013, CROWNWeb
19	and Medicare claims with, as I mentioned, over
20	5,500 facilities.
21	The IUR was 0.942, so pretty high.
22	Let me just see our comments. Basically, people

felt the specifications for reliability seemed
 pretty solid.

3	CO-CHAIR CROOKS: Nothing to add.
4	CO-CHAIR ANDERSON: Lorien?
5	DR. DALRYMPLE: So it was unclear to
6	me, are four times per week hemodialysis
7	treatments excluded? At the top it does not
8	appear they are, but then there is denominator
9	logic that says patient is not on frequent
10	dialysis? So I think I would argue if you're on
11	dialysis four times per week you shouldn't be
12	required to need a single pool of 1.2.
13	DR. DAHLERUS: So that's correct.
14	Patients on adult patients on four times or
15	greater are not included. It is just thrice
16	weekly dialysis, and we can clarify that in the
17	specifications.
18	DR. DALRYMPLE: Okay.
19	DR. DAHLERUS: Thank you.
20	DR. DALRYMPLE: Thanks.
21	CO-CHAIR ANDERSON: Alan?
22	DR. KLIGER: I just want to piggyback

on that for a moment, because the specifications 1 2 I think here are clear that it's three times a Period. Right? It is neither more nor 3 week. less than three times a week, and single pool 4 Kt/V can only be used if there is a single 5 frequency. 6 7 We'll get to talking about that with the next measure, but for this measure my 8 9 understanding is that it's a single frequency, three times a week. It could be if it's three 10 11 times a week. It's frequency -- it's a frequency 12 measure. 13 CO-CHAIR ANDERSON: Any further discussions or comments? Are we ready to vote on 14 15 reliability? 16 MS. BAL: Okay. We are voting on reliability for 0249. The options are one, high; 17 18 two, moderate; three, low; four, insufficient. 19 And voting is open. 20 Still waiting for a couple, if everybody could try to vote again. Yes. 21 Please vote again, just so we can get everyone. 22

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1	Okay. We have four high, 18 moderate,
2	three low I'm sorry, four high, 18 moderate,
3	zero low, zero insufficient, for 0249
4	reliability.
5	We can move forward to validity.
6	DR. BHAN: Okay. So for validity, you
7	know, this is based on the association of
8	clearance with mortality. They did do some
9	testing here looking, again, at the Spearman
10	correlations between achieving the target and the
11	SMR and SHR. And the coefficiencies we have seen
12	before are they are statistically significant,
13	although the magnitude is relatively small. So
14	with SMR it was negative 0.085, and the SHR was
15	negative 0.159.
16	And I think that's all the comments we
17	had. There weren't any significant exclusions.
18	CO-CHAIR ANDERSON: Any discussion?
19	All right. We'll call for the vote.
20	MS. BAL: Okay. Voting for validity
21	for 0249, the options are one, high; two,
22	moderate; three, low; four, insufficient. Voting

is open. 1 2 The results of the vote for validity for 0249 is three high, 19 moderate, one low, 3 zero insufficient, and we'll move forward. 4 CO-CHAIR ANDERSON: All right. On to 5 feasibility, Ishir? 6 7 DR. BHAN: Okay. So for feasibility, this data is in CROWNWeb, and certainly there is 8 9 lots of claims data. It has been done. It seems feasible. 10 11 CO-CHAIR CROOKS: I agree. CO-CHAIR ANDERSON: All right. 12 Any discussion? Call for the vote. 13 MS. BAL: Okay. Voting for 14 15 feasibility for 0249, one, high; two, moderate; 16 three, low; four, insufficient. Voting is now 17 open. 18 Okay. The results for feasibility for 19 0249 is 18 high, five moderate, zero low, zero 20 insufficient, and we'll move on to usability and 21 use. 22 DR. BHAN: Okay. So for usability, it

is being used. It is publicly reported. Not 1 2 much more to say. I think there is not too much question here. 3 CO-CHAIR CROOKS: And to the gap 4 issue, they were unable to show improvement in 5 the last -- I think this is the last four 6 7 quarters of -- I'm not sure what year, 2013, suggesting that, you know, it is consistent with 8 9 the notion that it's topped out. 10 CO-CHAIR ANDERSON: Any further 11 discussion on usability? All right. We'll call for the vote. 12 13 MS. BAL: Okay. The vote for usability and use of 0249 is open. The options 14 15 are one, high; two, moderate; three, low; four, 16 insufficient. Okay. The results for usability and 17 18 use for 0249 is 17 high, six moderate, zero low, 19 zero insufficient, and we can move on to the 20 overall vote. DR. KRISHNAN: Can I ask a clarifying 21 22 question just about the term "usability" for the

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NQF staff? When we say "usability," we have
 often in this setting been using it as it can be
 used for public reporting.

Is a component of use that the dialysis unit or whoever is being evaluated can receive that data back and actually do something with it in a timely fashion? Or is it only about it can be used for a public metric? How do you balance out the operational?

10 So, for example, if a metric is there 11 but the facility can't calculate it itself --12 clearly not this one, but just as an example --13 they can't improve because they don't know where 14 they are. Is that part of usability? Or is that 15 part of implementation? Or could you help me 16 with that?

17MS. BAL: I mean, I'll refer it to18Sarah, but I'll let her --

MS. SAMSPEL: Yes. I mean, you know, so one of the first requirements is the fact that it is publicly reported, and that we are moving -- you know, we want the entire industry, renal,

everybody else, to be moving towards public 1 2 reporting, at the same time that usability is an overall criteria even on the development phase of 3 something that whoever is reporting on the 4 measure can then take that measure back and use 5 it to improve performance or improve quality in 6 7 some way. So, yes, that is one of the things 8 9 that you should be considering under use and 10 usability. 11 Did you have anything you wanted to add, Marcia? 12 13 DR. KRISHNAN: So just so I can clarify, it's the ability to get real-time access 14 15 to the data, so whoever you're evaluating can 16 say, "Oh, my gosh, I'm not performing well. I've got to improve." 17 18 MS. SAMSPEL: Well, it's not 19 necessarily real time. 20 DR. KRISHNAN: Not real time. I keep using the wrong word, and we keep clarifying. 21 MS. SAMSPEL: The ideal situation is 22

you would have real time, but, you know --1 2 DR. KRISHNAN: The facts on the data. -- even if you're 3 MS. SAMSPEL: talking about HEDIS, you know, it is something 4 that should be coming back that has an 5 opportunity for the organization to use to 6 7 improve quality. DR. KRISHNAN: Okay. Yes. Ι 8 9 apologize. I keep using the wrong words, but we have different terminologies. 10 CO-CHAIR ANDERSON: 11 Any further discussion before we call for the vote for 12 recommendation for endorsement for reserve 13 14 status? All right. 15 MS. BAL: Okay. And as a reminder, 16 the specifications for reserve status is that it is topped out, but it would be harmful to lose 17 18 the measure, and that it is very strong in 19 reliability and validity. 20 So the vote for reserve -- for endorsement meets potential for reserve status 21 22 for 0249. The options are one, yes; two, no.

1Okay. The results are 22 yes, zero2no, so this has a potential for reserve status,3and we can move on to the next measure.4CO-CHAIR ANDERSON: Okay. All right.5Measure 1423, and, well, you guys are ensconced6there, Claudia and Joel?7DR. DAHLERUS: So this is a measure of8pediatric hemodialysis adequacy based on Kt/V.9It's a percentage of patient-months that achieve10Kt/V 1.2 or more. And this was developed in 201011by the pediatric hemodialysis adequacy TEP, and
and we can move on to the next measure. CO-CHAIR ANDERSON: Okay. All right. Measure 1423, and, well, you guys are ensconced there, Claudia and Joel? DR. DAHLERUS: So this is a measure of pediatric hemodialysis adequacy based on Kt/V. It's a percentage of patient-months that achieve Kt/V 1.2 or more. And this was developed in 2010
<ul> <li>CO-CHAIR ANDERSON: Okay. All right.</li> <li>Measure 1423, and, well, you guys are ensconced</li> <li>there, Claudia and Joel?</li> <li>DR. DAHLERUS: So this is a measure of</li> <li>pediatric hemodialysis adequacy based on Kt/V.</li> <li>It's a percentage of patient-months that achieve</li> <li>Kt/V 1.2 or more. And this was developed in 2010</li> </ul>
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11 by the pediatric hemodialysis adequacy TEP, and
12 it was originally endorsed in 2011.
13 The underlying context of the TEP's
14 recommendation recognizing that there was not a
15 lot of a large body of evidence defining a
16 specific threshold for the pediatric population,
17 but they did cite the KDOQI, the 2006 KDOQI
18 guidelines, which recommended and these were
19 opinion-based, expert opinion, but the guidelines
20 recommended that for pediatric patients Kt/V
21 should align with the minimum dialysis adequacy

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1	for the TEP defining this threshold.
2	Thank you.
3	CO-CHAIR ANDERSON: All right. And
4	it's Alan and Frank?
5	DR. KLIGER: So as we just heard, it
6	is a measure for pediatric hemodialysis, and the
7	specifications are for patients dialyzing three
8	or four times a week whose average delivered dose
9	of hemodialysis using UKM or Daugirdas II are a
10	single pool Kt/V of 1.2.
11	So I want to ask first a clarifying
12	question of the developers. The three or four
13	times a week, is that what was in the original
14	2011 version that was approved?
15	DR. DAHLERUS: Yes, it was. And that
16	was also stated in the TEP's formal
17	recommendations. The rationale, as I understand
18	them, is they wanted to ensure that children that
19	are dialyzing four times a week would still be
20	evaluated for adequate dialysis.
21	DR. KLIGER: Yes. So we will go
22	through the evidence in each of the categories,

but I want to lay out from the outset what I 1 2 think is a fundamental flaw and problem in this And it is -- it will apply for this 3 measure. measure and others as well. 4 The first, which we will deal with 5 quickly, is that as in many pediatric measures, 6 7 we don't have very much direct evidence for kids. And so this is really based on adult data with 8 9 the assumption that children should be doing at 10 least as well as adults do, and that's, I 11 believe, a very reasonable position to take. The problem is a kinetic measurement 12 13 problem, the way that the measure is currently constructed. And just because I wanted to make 14 15 sure that I had this right, I spoke to John 16 Daugirdas, the kineticist who constructed the Daugirdas II formula to make sure that what I was 17 18 saying and what I am going to be sharing today is 19 accurate. 20 When either the urea kinetic measurements overall or specifically Daugirdas 21 22 worked with his group in 2003, and then

eventually made the recommendations to KDOQI in 2006, the challenge was to come up with a measure that somehow approximated what the kidney really does. Kidney works 24 hours a day, seven days a week, obviously.

6 But in hemodialysis that is 7 intermittent treatment. The dynamics are very 8 different, because you have a burst of clearance 9 and then a long period between them of no 10 clearance at all.

And so a formula that measures what 11 12 happens in one specific treatment will be very 13 dependent on what happens around it, how frequent the treatments were. So, for example, in the 14 15 measure as it is currently constructed, if a 16 child is dialyzed three times a week, and the single pool Kt/V is measured -- and, of course, 17 18 the way it's done is a single treatment is 19 assessed with pre- and post-dialysis urea, and 20 you calculate the Kt/V. You'll have a number, whatever it is. If that same child is increased 21 22 to four times a week, or five times a week, using

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the methodology that is here, the Kt/V will not change. It will be exactly the same because of the way it is calculated.

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And the kineticists have been clear, and they were back in 2006, that if we are looking at varying frequencies of dialysis that rather than using a single pool Kt/V, the tool that we should be using is a continuous tool, one like what they have called the standard Kt/V.

10 And, in fact, in the KDOQI document 11 back in 2006, they have a table, Table 18, in the 12 Appendix that Dr. Daugirdas referred me to that 13 shows what the relative clearance would be 14 required depending on frequency.

15 So, for example, the minimum Kt/V of 16 1.2, giving patients who are dialyzed an average of 3.5 hours a week, is where we currently sit 17 18 for three times a week dialysis. If you look at 19 patients who are dialyzed four times a week, that 20 same point would not be 1.2. It would be 0.77. So if we were looking at adults or 21

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kids, all dialyzed four times a week, the minimum

dose that we would be asking for is not 1.2. It 1 2 would be .77, but that's only if all the patients were dialyzed four times a week. 3 So my point is that using single pool 4 Kt/V in patients dialyzed at different 5 frequencies is like using a tape measure to 6 7 measure somebody's weight. It is the wrong tool, and it really cannot consistently be used. And 8 9 Dr. Daugirdas was clear with me that he felt 10 passionately about that as well. The rejoinder could be that, well, 11 that is okay, as long as they're achieving that 12 13 minimum of 1.2, if they're dialyzed four or five times a week, then they're way over the threshold 14 15 The problem with that, I believe, is anyway. 16 that by setting up a minimum of 1.2 with whatever frequency it would be a disincentive to put 17 18 patients on increasing frequency of dialysis, 19 because that wouldn't change their Kt/V. 20 So a large child with a Kt/V of 1.0, done three times a week, with this measure, if 21 22 you went to four times a week it wouldn't change,

or five times a week it wouldn't change. So the 1 2 incentive would be instead of going to more frequent dialysis to extend the time, which --3 during single sessions, which if you do the 4 calculation is not nearly as efficient a 5 treatment as increasing the frequency would be. 6 7 So my point I guess is that there is, I believe, a fundamental flaw when we use this 8 9 tool, if we are looking at varying frequencies of dialysis. And in the real world we now know that 10 11 varying frequencies are becoming more and more common, not only for kids but for adults as well. 12 13 So I believe that that is really a fundamental flaw in this particular measure. 14 15 The second thing that I will mention, 16 but we have -- I mentioned yesterday as well is that for hemodialysis we are not including 17 18 endogenous kidney function. And it is reasonable 19 to do that, I believe, since most patients in any case lose virtually all of their endogenous 20 kidney function within the first year. 21 22 But I would love to see these measures

allow for -- not require, but allow for including 1 2 endogenous function in this measurement. So that incident patients with substantial kidney 3 function still available could have crafted 4 therapy to give them less dialysis time initially 5 until their endogenous kidney function was 6 7 reduced to the point that they required more So that is just my general comment. treatment. 8 9 When we go now specifically to the 10 evidence, the evidence here is based on the adult experience. We have heard already the evidence 11 for the adult experience, which is strong for 12 13 three times a week, Kt/V of 1.2. And the statement in KDOQI, as we have heard, is that 14 15 kids should have at least as good treatment as 16 So that is where the evidence is. adults. Now, I don't know, Connie, whether you 17 18 think we should vote on sort of the flaw in the 19 design, at least my perception of the flaw of the 20 design, in the evidence phase or in the

21 specifications phase.

CO-CHAIR ANDERSON: Well, I think we

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would be talking about it in the specification 1 2 phase. 3 DR. KLIGER: Okay. CO-CHAIR ANDERSON: I would like to 4 hear from our pediatric experts over here. 5 MS. BAL: If you wouldn't mind, could 6 7 we also discuss it during the specification? Just so we can make sure that, you know, what 8 9 people are hearing is focused on evidence, and 10 people vote on that, and then we'll move to the specifications. 11 CO-CHAIR CROOKS: And it's a tough 12 13 overlap between where it should be I guess. Ι have trouble voting on the evidence if this is an 14 15 So I'd prefer to get it talked about now. issue. 16 In terms of evidence, DR. SOMERS: although most of the evidence was within the 17 KDOQI, there was some CPM data that pertained to 18 19 adolescents particularly that showed that Kt/V 20 less than 1.2 is associated with a greater risk of hospitalization. There is some other 21 22 literature from Europe that supports that as

well. 1 2 CO-CHAIR ANDERSON: Lorien? DR. DALRYMPLE: But with respect to 3 our evidence voting, to my knowledge most of the 4 evidence -- but this is where the pediatric 5 nephrologist would be very helpful -- relates to 6 7 three times a week assumptions. So if it is specified on three or four times a week, doesn't 8 9 it fail on evidence on the four times a week 10 frequency? Because the evidence doesn't support 11 that frequency unless our pediatric nephrologist can inform us. 12 13 CO-CHAIR ANDERSON: Josh? I mean, you would have 14 DR. ZARITSKY: 15 a hard time, even if you just substitute 16 "pediatric" for "adult," and you said, well, you're going to have four times a week or daily 17 18 dialysis, and use a cutoff, a standard single pool Kt/V of 1.2. 19 20 So I don't -- I have a problem with using it for four times a week. 21 If they are 22 going to use a standardized Kt/V or other than

single pool, I think that would be different, and 1 2 we get into the evidence of a standardized Kt/V, but -- and there are guite a few children that 3 are dialyzed more than three times a week for 4 fluid issues as well. 5 I will tell you, practicality, it is 6 7 usually fairly easy to achieve a Kt/V above the standard in pediatrics, but the four times --8 9 just on a technical basis, I have the same type of feeling about the inclusion of the four times 10 11 a week. CO-CHAIR ANDERSON: 12 Lori? 13 DR. SOMERS: But what Alan said would If you are meeting a Kt/V of 1.2 14 still pertain. 15 four times a week, then you obviously would be 16 avoiding all the bad sequelae of having poor adequacy with your dialysis. 17 And my 18 understanding of kind of the proportion of children who are dialyzed four times a week is 19 20 somewhere between five and six percent, so it is, you know, a relatively small number of kids at 21 22 this point in time.

I just wanted to MS. HARTWELL: 1 2 piggyback on Alan's comment. It kind of frustrates me to hear that, you know, the 3 residual kidney function is a secondary issue, 4 and to the patient that is the primary goal, I 5 mean, of any patient on dialysis is to keep their 6 7 residual kidney function. It makes such a difference in their quality of life, their diet, 8 9 and to think that a measure doesn't help that or 10 maintain that is extremely frustrating to hear. And I think that that should be in 11 12 consideration when a developer creates a measure, 13 because we don't -- first, we don't want to do any harm. And if a physician can help keep the 14 15 kidney function, and, for example, when I was on 16 Next Stage, I had quite a bit of kidney function, and so I only needed it three times a week. 17 And 18 that went on for about six to eight months 19 because I was able to maintain my own kidney 20 function. But what I'm hearing is is that may 21

not always be the case, if a doctor is

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prescribing -- you know, so that's just my comments. So I'm a little concerned about hearing that.

DR. KASKEL: So in the small infant 4 and small child, it is very common to be doing 5 dialysis at least four times a week. And even if 6 7 you achieve the goal and they are not growing, yet your nutritional assessment is adequate, and 8 9 most of these infants are on G tubes, so they are 10 getting the nutrition at night, we increase the 11 dialysis time. We'll go to five days a week. We have infants on dialysis sometimes five days a 12 13 week, most of them four, and we measure growth. If they don't grow, they may need more, despite 14 15 the calculations.

16 So it's a very soft sign, and it takes 17 a long time to determine growth. It's not just a 18 week; you're looking at months.

CO-CHAIR ANDERSON:

20 DR. MADDUX: So as we talked about 21 this in the workgroup, and we bought up 22 yesterday, one of the issues with a number of

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Frank?

these, and certainly with this one, with the small body mass that patients have, and the others, is whether the urea kinetic model, or simply the Daugirdas formula, really equate to the same thing.

I would ask my pediatric colleagues
whether the urea kinetic model that was
predominantly built in adults is 100 percent
applicable, especially when you get down to the
very smaller sized children, especially looking
at the urea generation rates and the nutritional
issues that I think were just brought up.

And these are just issues where we are applying something to a population that really was developed for a different population. I think we need to make sure we are aware of that as we look at this one.

DR. KASKEL: I wouldn't go too far into the urea modeling or kinetics for us in the growing -- you know, maybe a stable adolescent who is not sick and losing weight. That's one thing. But not in the growing child or the not

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growing child or adequately growing child, no, I
wouldn't.

DR. MADDUX: One other corollary 3 question on that for you all is, do you even do 4 formal urea kinetic modeling often in children? 5 I think that we are --DR. KASKEL: 6 7 you know, we are stuck, once again, with the tools that -- there is a limited set of tools, 8 9 and so we do use this as a tool. So I do think 10 it's still an important measure for us to be 11 calculating it and to -- especially as, you know, 12 our children grow.

13 But, obviously, we take a lot of other things into consideration, but we just don't --14 15 you know, we don't have the body of evidence. 16 And, you know, you could make the argument it's small solute -- you know, is there just 17 18 overemphasis on small solute calculations because 19 they're easy to do? We know the modeling, but 20 they're still a tool that you have to use, and maybe that's the best tool we have now. 21 So it's 22 still a very valuable tool for us.

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1	CO-CHAIR ANDERSON: Alan?
2	DR. KLIGER: So let me ask you what
3	tool you are using. Are you using the standard
4	Kt/V or the single pool Kt/V when you have
5	patients that have varying frequencies of
6	dialysis?
7	DR. SOMERS: Standard for varying.
8	DR. KLIGER: You're using the standard
9	Kt/V, not the single pool.
10	DR. SOMERS: At least that's what I'm
11	using.
12	CO-CHAIR ANDERSON: Any further
13	discussions or comments? All right. We are
14	ready for the vote on evidence.
15	MS. OGUNGBEMI: The committee is now
16	voting on evidence for Measure 1423. The options
17	are one, high; two, moderate; three, low; and,
18	four, insufficient. Voting is open.
19	The results are zero votes high, nine
20	votes moderate, 11 votes low, and three votes
21	insufficient. The measure does not fail on
22	evidence. This is Measure 1423. It does fail,

I'm sorry, does not pass on evidence.

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MS. SAMSPEL: Actually, and so what we want to do here, and something that we have afforded to other developers, is -- and what a fail means at this point is that we do not move forward with the vote.

7 However, what we would ask, and I think Alan has already expressed, you know, some 8 9 of his concerns, but also any additional advice 10 that you can provide to the developers as they consider this measure, if they do take it back to 11 12 a TEP, et cetera, what are those types of things 13 that would change the game on this measure and how you would vote in the future. 14

15 DR. ZARITSKY: Just a procedural --16 are we allowed to move forward with the other consideration, that there is not enough evidence 17 18 but we are still -- what is that fourth -- the 19 exception? Or that has to be -- then they have 20 to have a majority of insufficient evidence vote. Can you remind me of the procedure there? 21 22 MS. BAL: Yes. We can still move

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forward and vote on insufficient with exception, 1 2 if that's what the committee would like to do. DR. KLIGER: Can I just raise an 3 understanding of that? Because if it's approved 4 with exception, doesn't that say that we think 5 that it's a valid measure, it's just that it 6 7 doesn't -- it either has topped out or there is some other reason not to be using it, but that 8 9 has strong evidence for it? That's the way you 10 have instructed us, that there is strong evidence 11 for it. 12 MS. BAL: No. For the exception with 13 -- the evidence with exception -- I'm sorry, insufficient evidence with exception, it is that 14 15 there is low or insufficient evidence to support 16 the measure; however, you feel that other factors are strong enough to move this measure forward, 17 18 such as you think that this is an important 19 enough measure, or that the other factors, such 20 as reliability, or the fact that it is in use and it is being used well, that kind of thing. 21 22 So if you think that other factors

will be higher, and this is a measure that should 1 2 be kept, then yes. The exception is on the evidence, so if evidence would be low, everything 3 else you should consider would be higher. 4 DR. KLIGER: I would just argue I 5 guess that it means that that would be an in-6 7 practice measure. And I think this is really a fatally flawed measure as currently constructed. 8 9 I think if the team goes back and substitutes 10 standard Kt/V, and does the work to do the 11 measure -- you know, the background work to do 12 the gap analysis, et cetera, using standard, then 13 we might feel differently. But I would -- I just have trouble approving this with exception in its 14 15 current form. 16 DR. SOMERS: I mean, or we could just restrict it to children being dialyzed three 17 18 times a week because it's such a small proportion 19 of kids who have more than three times a week. 20 CO-CHAIR CROOKS: Well, we can't do The developers could take that --21 that. 22 Right. No, but that's DR. SOMERS:

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our suggestion.

2	CO-CHAIR CROOKS: Yes. I'm thinking
3	of the exception as, for instance, you know, we
4	know it's important; the evidence just isn't
5	there, like jumping out of a plane without a
6	parachute is a bad thing, but no one has ever
7	done the trial. I think we would give that an
8	exception. That's the sort of but here we are
9	saying that the we are not sure it's that
10	important, and as it's constructed it has flaws.
11	But I think anybody else who would
12	like to speak to considering this as an
13	exception?
14	DR. ZARITSKY: So with just that in
15	mind, I mean, you know, I think that this is, you
16	know, an important measure, and I would like to
17	see the four times a week I would rather not
18	see a standardized Kt/V. I would rather see the
19	three times a week, you know, single pool
20	implemented.
21	And I brought up the exception issue
22	because I do think it's an important it's an

important measure that we have and that we don't 1 2 just totally, you know, get rid of it. It's --CO-CHAIR ANDERSON: We can call for 3 the vote for exception. 4 DR. ZARITSKY: So just in the future, 5 if you're going to -- if you have an idea that 6 7 you want to do an exception, then the category you should be voting for is, then, number four, 8 9 right? Yes? 10 CO-CHAIR ANDERSON: Any more discussion in terms of calling for the vote for 11 12 exception? 13 DR. FISCHER: Can you just clarify what we are going to vote on? The exception of -14 15 - maybe I'm just a little bit confused. The 16 exception of what? What exactly are we voting 17 on, please? 18 MS. SAMSPEL: So basically, you know, when the votes fall down into this three or four 19 20 category, so low or insufficient evidence, typically a high number of votes in insufficient 21 22 would mean that you think that while the evidence

provided did not support the measure that it is still an important enough measure that you would like to see it continue through the voting and recommend endorsement with exception to the evidence.

You know, I think in this case, you 6 7 know, it also sounds like there was some confusion, how do you get to that vote of 8 9 exception for evidence, is it low or is it insufficient, and so, you know, I think what I 10 11 have heard is that there may be a consideration, 12 and we might just want to get out on the table, 13 do the vote of how many people want to say, you know, we think this is an important enough 14 15 measure to continue to move it forward through 16 the voting process.

I think the other things that I keep in mind here are the fact that this is all going to be documented in the report, that there is also this opportunity during public comment to get more information out of the public on how they feel about the measure that will come back

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for your consideration as well.

2 So the measure doesn't technically die here in this room today if it does not go all the 3 4 way through. DR. KRISHNAN: But just to what Josh 5 said, Sarah, if he wants to have the exception --6 7 or if he wants to have the measure only apply for three times a week, am I voting on what is 8 9 written, or do we have to go back and --10 MS. SAMSPEL: In this case, we are voting on what is written based on --11 12 DR. KRISHNAN: Okay. So without the 13 three times a week. 14 MS. SAMSPEL: Correct. 15 DR. KRISHNAN: Okav. 16 DR. FISCHER: So if we vote yes, then regardless of concerns about evidence we are 17 18 going to move forward and discuss the measure and 19 potentially move to endorse it. If you vote no, 20 then you feel that it's not -- regardless of the evidence, you don't feel it's worth further 21 22 discussion. Is that correct?

So I -- I mean, if you MS. SAMSPEL: 1 2 vote yes with exception, we will continue with both the discussion and the vote, you know, as 3 long as it then passes reliability and validity. 4 In the event that you vote no, that you don't 5 feel that it needs exception, then, you know, 6 7 technically the votes stop, you could still discuss and give some recommendation, so that we 8 9 have it in the report, and that goes out to 10 public comment. We work with the developers in the 11 meantime to see if they can make revisions prior 12 13 to the post-comment call. DR. KASKEL: I think it's important 14 15 enough with all of the flaws that Alan so 16 beautifully brought up, is that this should be an exception, and we don't -- we used this, and we 17 18 need this. It's a guideline. I don't want it to 19 sound like we don't use it. We do. 20 Small percentage of patients may need dialysis more than three times a week because of 21 22 growth issues and, et cetera, but I still think

1 it's all we've got. And, yes, there needs to be 2 some development, some TEP, and input, to make it 3 better.

CO-CHAIR ANDERSON: Andy?

5 DR. NARVA: No. That was exactly my question. I -- because if we -- this goes away, 6 7 we have no pediatric adequacy measure. And I realize we are only supposed to talk about 8 9 evidence, but my sense is that pediatric nephrologists want this as a tool to improve 10 11 care, despite its flaws, and that would be 12 correct.

13 CO-CHAIR CROOKS: There is a later 14 measure coming up that does include this as kind 15 of a compilation of the four. And does that have 16 the same specification? It does.

DR. ANDRESS: There are two more measures. One is a combined pediatric and adult human dialysis measure, and it is a combination of the adult and human dialysis measure that was just discussed and this measure.

And then there is the composite

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1	measure, which well, the overall measure that
2	includes the human dialysis and the peritoneal
3	dialysis measure that we discussed yesterday.
4	And that would include the same specifications
5	for pediatric patients on human dialysis.
6	CO-CHAIR CROOKS: So I think we need
7	to discuss and vote on whether we want to
8	consider this an exception, this other
9	DR. SOMERS: The other measures, the
10	frequency for children can still be four times a
11	week. Is that correct? I thought that was the
12	case.
13	DR. ANDRESS: As currently specified,
14	that is correct.
15	DR. SOMERS: But the same issue.
16	DR. KLIGER: That would be the same
17	issue for children and adults.
18	DR. DAHLERUS: So the three or four
19	times was only specified for the pediatric
20	measure. It is not has not been specified for
21	the adult, and, again, that change would be
22	reflected in the other measures.

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1	DR. KRISHNAN: Can we do what we did
2	yesterday for the upper bound gate thing? Can we
3	do it's the exception but with the stipulation
4	of this exclusion?
5	CO-CHAIR CROOKS: I don't view it
6	parallel because it in that case, it just
7	it didn't change a thing except to remove it.
8	But here the evidence base is changed. We don't
9	know should they be going to standard or to
10	single pool only three times a week, and there's
11	other things that the developer would need to
12	consider, I believe.
13	CO-CHAIR ANDERSON: Frank?
14	DR. MADDUX: So I just want to be
15	clear, again, to Michael's point, what we're
16	going to be voting on here. It strikes me that -
17	- I'm a little concerned about the degree of the
18	way we view stipulations. I certainly understand
19	it, and think for the typos and the
20	administrative sort of logistics item that is
21	fine. But to me this is much more fundamental.
22	And my assumption is, recognizing that

this is an existing measure that is in use, yet a 1 2 measure that has some distinct flaws because of the three or four times, is the exception for us 3 to say that this measure, as designed, would 4 still be okay, versus this measure needs 5 reconfiguring to be designed properly in either a 6 7 future iteration or an adjustment? I would take it to CO-CHAIR CROOKS: 8 9 mean that voting for an exception means that we 10 think the measure is okay as it is, and not 11 necessarily recommending a reconfiguration, whereas if we don't give an exception, they do 12 13 have the opportunity to -- that almost pushes them to make it better somehow. 14 15 CO-CHAIR ANDERSON: Josh? 16 DR. ZARITSKY: Just for the sake of the exception, which I would recommend that we at 17 18 least put it up to a little vote, is that I could 19 make the argument that the evidence, as it 20 stands, even for a 1.2 Kt/V, there is very limited evidence, where, again, borrowing from 21 22 the adults, and so I think that's another avenue.

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So to get hung up on the -- you know, 1 2 the four times a week when it's five percent, and we really don't know, is that really 1.2, maybe 3 if we do 1.2 for four times a week there is 4 additional benefit. 5 You know, technically I have a problem 6 7 with it, but philosophically I would like to see it put up for the exception. 8 9 CO-CHAIR ANDERSON: Alexandra? CO-CHAIR CROOKS: Lisa is first. 10 11 So I am struggling with DR. LATTS: hearing the evidence here versus hearing our 12 13 pediatric colleagues who know more -- way more about this than I will ever ever know, telling me 14 15 they need this measure. 16 And then I am also struggling with there are other measures that we will need to 17 18 reconcile at some point. So I guess I'd like to 19 see this one go through the process, then 20 reconcile and we sort it out. DR. DALRYMPLE: Can I just ask a 21 22 procedural question? Because I think it's clear

we all want a pediatric measure, but we want it 1 2 to be valid with kid specifications. (Laughter.) 3 So just for our own understanding, 4 Sarah, suppose we decide not to pass making 5 exception for insufficient evidence. 6 So we 7 decide today that the majority does not go that way, in theory, now that we are a standing 8 9 committee, how quickly could CMS bring a new measure back to us, us reconvene via telephone 10 workgroups, if they followed, for example, the 11 pediatric recommendations saying just -- just 12 13 make it three times a week for it to have evidence that supports -- I mean, how quickly 14 15 could it come back to us for review and make it 16 to public comment, et cetera? 17 MS. SAMSPEL: So, I mean, procedurally 18 what would happen in this case for this measure 19 is that if you fail it here, you know, again, 20 technically the votes stop, you could still continue your discussion for sake of the future 21 22 measures as well, and that we have it in line and

also have direct feedback to the developers on what would need to be done in the future for you 2 all to want to reconsider it. 3

However, if it -- basically, a failed 4 vote here means you do not recommend it for 5 It still goes out for public 6 endorsement. 7 comment, so -- and then -- so that, you know, it takes us a month to get the report together, 8 9 another month for public comment, we get you all back together. During that time, if CMS can make 10 11 those adjustments, you know, and provide the 12 data, et cetera, that you would need to put it 13 through, you could revote on it technically in a 14 couple months.

15 However, you know, that is kind of an 16 ideal situation. If that doesn't happen, then, you know, I think it's up to CMS to say these are 17 18 significant -- you know, these are significant 19 changes to the measure, and, you know, it is 20 between CMS and NOF to determine, is it a lost endorsement or is it something that holds for a 21 22 while while they have a plan in place to resubmit

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the measure with significant changes. 1 2 CO-CHAIR ANDERSON: Yes? DR. ANDRESS: So in terms of timeline 3 and responding, I agree, I think this is a 4 somewhat different circumstance than the measures 5 discussed yesterday, in part because I think the 6 7 stipulation there was a fairly straightforward case of not changing the measures, and we knew 8 9 what the answer was at the time, without changing 10 the measure. In this case, of course, there is the 11 potential that the measure itself is changing. 12 13 You know, is the answer -- you know, just a question I would have for -- to look at it, is 14 the answer to retain patients who are treated 15 16 four times weekly with a different target, or is it a different way of -- should there be a 17 18 different way of calculating target, or just 19 simply to remove the four times weekly patients 20 entirely? I mean, I think that's a question to be investigated and not something to be 21

22 stipulated to in this meeting.

In terms of the timeline, I think we are pretty confident that we can investigate that and get back to the committee following the public comment period, you know, and that can be considered.

I think the other issue to consider is 6 7 that there is -- we are planning on a renal project next year as well, where we are already 8 9 going to be submitting some other measures, and keeping in mind of course that this -- this 10 11 probably rebounds to the two following measures That might also be -- if we can't 12 as well. 13 resolve it in the two months until the public comment period is over, that might be another 14 15 opportunity to address the concerns.

I think from our perspective of course we want to retain pediatric patients in the assessment of adequacy for a number of reasons that are not entirely related to evidence. I think from a policy perspective it is important to keep a focus on the treatment of pediatric patients, and they are already systematically

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excluded from a number of other quality measures in our various programs.

And I think that is certainly 3 something that is worth pursuing as this 4 committee sees fit, and we are certainly willing 5 to put the effort into ensuring that the measure 6 7 both comports with the quality standards but also addresses what I think is a continuing need for 8 9 quality in the dialysis community. 10 MS. SAMSPEL: Did that answer your 11 question? I mean, do you -- does everybody feel clear on what the timelines could be based on the 12 13 vote? Yes. Okay. CO-CHAIR ANDERSON: Are we ready to 14 make a vote on insufficient evidence with 15 16 exception or no exception? MS. OGUNGBEMI: The committee is now 17 18 voting on Measure 1423, evidence, potential 19 exception to empirical evidence. The options are 20 one, insufficient evidence with exception; and, two, no exception. The vote is now open, and I 21 22 will be voting for Ms. Hartwell, since she

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stepped out of the room.

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3	The results are 14 votes insufficient
4	evidence with exception, and nine votes no
5	exception. The measure passes with insufficient
6	evidence with exception.
7	CO-CHAIR ANDERSON: All right. So
8	let's move on to performance gap. Alan and
9	Frank.
10	DR. KLIGER: Okay. Performance gap,
11	the developers did look at a relatively small
12	group of patients. Congratulations, you found
13	the pediatric patients to examine for this in the
14	CROWNWeb 2013 data set showing 85 percent
15	adherence with a range between 56 and 100
16	percent. There were no not enough evidence to
17	look at skewedness or subgroup analysis.
18	DR. MADDUX: The only thing I would
19	add is that there was a mild gap recognized in
20	the small population that was studied.
21	CO-CHAIR ANDERSON: Any further
22	discussion? Are we ready to vote on performance

1 gap? 2 MS. OGUNGBEMI: The committee is now voting on performance gap for Measure 1423. 3 The options are one, high; two, moderate; three, low; 4 and, four, insufficient. Voting is open. 5 The results are one vote high, 17 6 7 votes moderate, two votes low, and two votes insufficient. Measure 1423 passes on performance 8 9 gap. 10 CO-CHAIR ANDERSON: Moving on to 11 reliability. Reliability of the 12 DR. KLIGER: 13 specifications, I guess we've already beat that dead horse. So I think that there is a real 14 15 problem with the specifications and personally 16 would find trouble passing this on the specifications. 17 18 In terms of the reliability testing, 19 there was, again, testing on this small group of 20 patients showing an IUR of 0.81, saying that about 81 percent of the variation of the measure 21 22 is attributed to between facility variation. The

pre-reviewers, who incidentally did a fabulous 1 2 job -- thank you very much -- found that this translated to moderate reliability, and I agree 3 with that. 4 CO-CHAIR ANDERSON: Any further 5 discussion on reliability? All right. Ready to 6 7 call for the vote? MS. OGUNGBEMI: The committee is now 8 9 voting for Measure 1423, reliability. The 10 options are one, high; two, moderate; three, low; 11 and, four, insufficient. Voting is open. The results are one vote high, 11 12 13 votes moderate, seven votes low, and two votes insufficient. Measure 1423 fails on reliability. 14 15 Possibly not. One moment. Yes, it -- is it --16 MS. BAL: So we would need a high moderate to be at least 60, so it's actually gray 17 18 zone. Sorry, I shouldn't have said failed. It 19 is a gray zone measure. So for -- I think we 20 briefly went over it through one of the workgroup calls, but for anyone who was not on the call, 21 22 the gray zone is a place between 40 and 60

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percent. So that's the point we're at. We're at
 57 percent of agreement.

So basically what that means is that 3 we were not able to come to consensus on 4 reliability, and we would open that up -- when we 5 do our draft report, we will write that in the 6 7 draft report and say, "Ask for comments from the public," but we do move forward with the measure. 8 9 But we basically said the committee didn't come 10 to consensus. 11 DR. FISCHER: People didn't vote. Two 12 people --13 MS. BAL: Lori is not in the room. So, and we can't vote for her. Well, she wasn't 14 15 at her -- we can do a revote and --16 DR. FISCHER: Yes. I'm just pointing it out because we didn't have --17 18 (Simultaneous speaking.) 19 MS. BAL: And please check your 20 batteries, if we're not getting your vote. DR. FISCHER: So we're voting on --21 22 just so I'm clear, we're voting on both the

specifications and the reliability. So it's not 1 2 just about the reliability of testing. It's also about the specification, which have been -- I'm 3 just confirming, just so I understand what we're 4 5 voting on again. CO-CHAIR CROOKS: Yes, you're correct. 6 7 We're voting on both, which may or may not have -- be the right way to do it, but --8 9 MS. BAL: So we will go ahead and 10 revote, and just, again, to clarify, to answer Michael's questions, when you're voting on 11 reliability, you are voting on both 2(a)(1), 12 13 which is the precise specifications, and the testing, so the appropriate method and scope with 14 15 adequate results of the testing. 16 The other thing I am just going to ask is that when you vote, and you point at 17 18 Alexandra, that you make sure your number is 19 showing up in your little screen. And I know 20 people are, but this is really kind of a really important place where we need all the votes. 21 22 MS. OGUNGBEMI: The committee is now

voting for Measure 1423 on reliability. Options 1 2 are one, high; two, moderate; three, low; four, insufficient. Voting is open. 3 MS. BAL: As you've seen, we do need 4 those two other votes. 5 MS. OGUNGBEMI: The results are zero 6 7 high, 11 votes moderate, 11 votes low, and one vote insufficient. The measure is still in the 8 9 So we will continue with the next gray zone. 10 criteria. 11 CO-CHAIR ANDERSON: All right. Moving 12 on to validity. 13 DR. KLIGER: This one is easy. It's on face validity, so that is the criteria. 14 15 CO-CHAIR ANDERSON: Frank, any other 16 comments? DR. MADDUX: No other comments. 17 18 CO-CHAIR ANDERSON: Any further 19 discussion? Are we ready to vote for validity? 20 MS. OGUNGBEMI: The committee is now voting on validity for Measure 1423. The options 21 22 are one, high; two, moderate; three, low; and,

four, insufficient. Voting is open. 1 2 Results are zero votes high, 18 votes moderate, four votes low, and one vote 3 insufficient. Measure 1423 passes on validity. 4 CO-CHAIR ANDERSON: Moving on to 5 feasibility? 6 7 DR. KLIGER: It's used in CROWNWeb. It has been used. I don't whether we can do both 8 9 of them together, but it has been used and it 10 appears to be feasible. 11 CO-CHAIR ANDERSON: Any further comments or discussion? Call for the vote. 12 13 MS. OGUNGBEMI: The committee is now voting on feasibility for Measure 1423. Options 14 15 are one, high; two, moderate; three, low; and, four, insufficient. Voting is open. 16 Results are 14 votes high, eight votes 17 18 moderate, one vote low, and zero votes 19 insufficient. Measure 1423 passes on 20 feasibility. CO-CHAIR ANDERSON: Usability and --21 22 use and usability?

DR. KLIGER: So it's currently
reported in Dialysis Facility Compare, and the
QIP, so it appears to be usable.
CO-CHAIR ANDERSON: Any other further
comments or discussion? Call for the vote?
MS. OGUNGBEMI: The committee is now
voting for Measure 1423 on usability and use.
Options are one, high; two, moderate; three, low;
and, four, insufficient. Voting is open.
Results are 17 votes high, six votes
moderate, zero votes low, and zero votes
insufficient. Measure 1423 passes on usability
and use.
CO-CHAIR ANDERSON: Before we move on
to endorsement, is there any further discussion
regarding this measure, or comments or questions
for the developers?
All right. We are ready to move on to
vote for endorsement, and it is with exception.
Is that how we state it?
MS. BAL: The exception is only for
evidence.

1 CO-CHAIR ANDERSON: Oh, just for 2 evidence. Okay. To move on recommendation for 3 endorsement.

MS. SAMSPEL: Actually, overall 4 suitability for endorsement. Sorry. And I'm 5 just making a point about this. 6 So you are 7 recommending endorsement. Technically, the endorsement body is the board of NQF. So yours 8 9 is a recommendation for suitability for 10 endorsement.

11 DR. LATTS: Okay. So, wait, so with all of the previous discussion and the 12 13 exception/approval of the evidence, when we are doing the endorsement, is it forgetting all of 14 15 that and just taking it as it is written? Or is 16 it understanding that there is this exception and we have asked the developers to go back and 17 18 rewrite it?

19 MS. SAMSPEL: So, in this case, there 20 is the exception, and then there is also the gray 21 zone. So this measure has work to do, and you 22 will have an option of revoting.

MS. BAL: Just a clarification. The 1 2 exception is not that you are telling the developer to do so. The exception is just 3 stating that you take -- you have seen the 4 evidence, you don't feel that it's strong enough 5 to support it, but you feel the measure is 6 7 important enough, and you are going to -- where normally you would have to stop at evidence, you 8 9 are saying that you fully can bypass that. 10 So your -- the exception was not that 11 the developer has to make this change. However, you have given that recommendation to the 12 13 developer, and they can take that and provide changes for you. I just want to make that clear, 14 15 that there was an exception. 16 CO-CHAIR CROOKS: And what is the ultimate impact of the gray zone vote? 17 18 MS. BAL: So the gray zone, since it 19 was only on reliability at this point, we would 20 send it -- you know, put it in the draft report, ask for public comment. You can choose to 21 22 revote, if you want. If you feel that whatever

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you receive is not enough for you to revote, we would leave it as is. The only vote you would need to reconsider is if on this vote, overall suitability for endorsement, you were in the gray zone.

6 So same thing, we would, you know, put 7 in the draft report, ask for comments, and then 8 we would ask you to revote at that point to get -9 - see if we can get you to come to consensus, 10 only if this vote goes that way.

DR. ZARITSKY: So it seems that it is 11 a safe -- I mean, it would be sort of a 12 13 compromise, then, if we had the option of saying we want to revote on that gray zone depending on 14 15 they had -- they had made a change, right? That 16 would give us -- that would say we have to revote on that to then pass it on the measures. 17 Is that 18 my understanding?

MS. BAL: Well, you can revote either way. So you can have the gray zone and revote, or you can just say, "Listen, based on what we have received from the developer, and what we

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have received from public comment, we feel that we need to revote." And then you can make that decision as well. So does it -- you have that opportunity no matter what.

DR. ZARITSKY: Are we voting a 5 revote -- I mean, I guess what I'm getting at is, 6 7 how do we know that we are going to -- I think people in the room would feel a lot more 8 9 comfortable if there was a revote on that gray 10 zone as a safety measure to say, "Hey, you know, I'm not comfortable with the way that it's 11 written now." I guess that's the question I'm 12 13 getting at.

MS. BAL: We generally just do a 14 15 verbal disclosure, and then we'll vote on that. 16 And, unfortunately, there is no way for us to trigger a gray zone, but we can definitely make 17 18 this a guaranteed item on our agenda for the post-meeting call. So we would discuss this and 19 20 you would get to decide if you want to revote on this measure or not. 21

CO-CHAIR CROOKS: I still am not

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In order for us to exactly clear on process. 1 2 recommend for endorsement, we have to have 60 percent or greater, especially on the top two, 3 importance and scientific acceptability of the 4 measure. And if we haven't achieved that, then 5 we haven't reached consensus, and how can we be 6 7 voting to endorse it? Does that make -- so I'm asking if the process is that we must reach 8 9 consensus on each category in order to be voting 10 for endorsement. And we haven't reached 11 consensus on reliability, so how can we be voting 12 for it? So the vote is we're going to endorse it 13 if the gray zone can be cleared, or how can we 14 even --15 MS. SAMSPEL: So this is in one way 16 why I was trying to make that distinguishment. So in this case, basically what you're saying is 17 18 overall for Measure 1423 -- that's where we are, 19 So for Measure 1423, you have actually correct? 20 passed it through on importance because -- with an exception to the evidence. You're in the gray 21

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zone, so you did not reach consensus on

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reliability.

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2	However, it did meet and you did
3	pass it through on validity, feasibility,
4	usability and use. This overall suitability for
5	endorsement is then looking at a whole in all of
6	the criteria. Would you currently have your
7	recommendation be this measure is suitable for
8	endorsement as it is currently specified in front
9	of you?
10	Either way, what will happen with the
11	gray zone is during you know, we will be
12	seeking public comment. The developers have also
13	a period of time to make changes to the measures.
14	That all comes back to you during the public
15	comment call, you know.
16	Kind of to address your question,
17	Josh, it is actually up to the committee. If we
18	got no comments, if the developer said, "Forget
19	it. I'm not going to do anything. We're not
20	going to put investment into this." You could
21	say, "No, we're not going to revote. We want to
22	leave our vote as stands." Or you could say,

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You know, we want to revote," and then you "No. 1 2 turn it down. So technically this is an initial 3 indication that right now you think this measure 4 is recommendable to continue its endorsement 5 6 process. 7 DR. LATTS: And that is if we vote If we vote yes, you're saying --8 yes. 9 MS. SAMSPEL: If you vote yes. Or you 10 could vote no, and still -- there is still that 11 almost a cure period of the public comment where you get more -- a broader range of information 12 13 from NQF members and the public as well as what the developer may or may not plan to do, and you 14 15 would take that into consideration. And on the call, we would say, "Okay. With all this new 16 information, do you want to vote or revote?" 17 You 18 know, I'm guessing you guys would say yes, and 19 then we would do a revote and it would be an 20 online revote --So it's almost --21 DR. LATTS: 22 -- of all criteria. MS. SAMSPEL:

DR. LATTS: So this vote is 1 2 essentially not binding right now, one way or the other. 3 MS. SAMSPEL: Well, it's -- well, yes, 4 I mean, I think it's binding in the fact that it 5 puts it through the NQF process. It helps us 6 7 understand where it is slated, what additional information we need to gather, how we put it into 8 9 the report, what your issues were, bringing to 10 the attention some of the important concepts that 11 you brought up. You know, the reality is is even after 12 13 that final public comment vote, you know, the measures go through the CSAC, and the CSAC is an 14 15 additional layer before it goes to the board. 16 DR. ANDRESS: I'm sorry. One clarification I would ask for. 17 My prior 18 understanding had been that if we -- if the 40 19 percent threshold is not met for the gray zone, 20 then the measure does not continue through public Is that correct? Or will it go 21 comments. 22 through public comments regardless?

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MS. SAMSPEL: Everything goes through 1 2 public comment. DR. ANDRESS: Okay. All right. 3 MS. SAMSPEL: It's just the 4 nomenclature on the measure. 5 DR. ANDRESS: Okay. 6 7 MS. BAL: You may be confusing that with voting. We don't vote on measures that 8 9 don't go through, but we would still do public 10 comment. I'm sorry, not -- the committee would 11 The membership does not vote on those vote. I think that's new here. 12 measures. 13 CO-CHAIR ANDERSON: All right. Are we ready to vote for suitability for endorsement? 14 15 MS. OGUNGBEMI: The committee is now 16 voting for overall suitability for endorsement on Measure 1423. The options are one, yes; two, no. 17 18 Please vote. 19 MS. BAL: So the measure is in gray 20 zone, so you will get to vote on it at the postmeeting comment -- I mean, the post-comment 21 22 meeting.

1	CO-CHAIR CROOKS: How are you enjoying
2	the land of Kt/V today? It just never ends.
3	Okay. So we are moving on to
4	Measure 2703. I'm going to take the helm as
5	Connie is recused on this particular
6	CO-CHAIR ANDERSON: No. I'm not
7	recused. I'm evaluating.
8	CO-CHAIR CROOKS: There's a conflict?
9	Oh, it's not this one.
10	CO-CHAIR ANDERSON: No.
11	CO-CHAIR CROOKS: Oh. Okay. Well,
12	then, you may continue. You're doing a great
13	job. I guess I'll okay. This is Measure
14	CMS measure minimum delivered dose, hemodialysis
15	dose. Our developers are at the table, and take
16	it away.
17	DR. DAHLERUS: And, again, I will keep
18	our remarks very brief. So this is the combined
19	hemodialysis adequacy measure. So it includes
20	both the adult and pediatric populations, and the
21	assessment is whether the respective adult and
22	pediatric populations achieved minimum Kt/V, and

that in this case is 1.2. 1 2 As we stated earlier, and in yesterday's discussion, we will be removing the 3 upper threshold of 5.0. 4 DR. MADDUX: So we won't go through 5 the entire discussion we just went through, but 6 7 basically this is the combined measure. For the evidence, the KDOQI guidelines were used from 8 9 2006. The guidelines related to pediatrics, and adults were similar to what has been previously 10 11 presented. And there was evidence presented from 12 13 the hemo trial as well, comments from the workgroups recognized some of the same issues 14 15 surrounding the criteria for three times per week 16 versus other, you know, pediatric, as well as the distinction between the various mechanisms of 17 18 calculating this. 19 CO-CHAIR CROOKS: Okay. The evidence 20 is open for discussion. I'd just like to mention there was a long list of references of additional 21 22 evidence, and which in the instructions requests

a summary for each article, and that wasn't done, 1 2 this long list of references. And interested as I am, I'm not going to go look up the articles to 3 see what they say. So, again, I'd encourage the 4 developers to follow the directions on the form. 5 I don't know about the quality of the evidence 6 7 beyond KDOQI. DR. MADDUX: And I would just ask the 8 9 developers to confirm that for the pediatric 10 component of this there was the three or four 11 again. 12 DR. DAHLERUS: Correct. So the 13 discussion that we had for the last measure 14 applies here as well. CO-CHAIR CROOKS: Other discussion 15 16 about the evidence? I'm sorry. Mahesh. Is there any direct 17 DR. KRISHNAN: 18 evidence that a combined measure has utility? Or 19 we're saying the fact that the two components 20 each independently have utility means that we should confer the associative property to the 21 22 combined metric, is that correct?

CO-CHAIR CROOKS: Well, I am going to 1 2 presume that the reason is similar to what we heard yesterday, that for small units or units 3 that have a small number of peds, we want to make 4 sure the peds patients get included. But you're 5 asking, is there evidence that this is a good 6 7 measure. It wasn't just in DR. KRISHNAN: Yes. 8 9 the policy, get the policy component, the minimal 10 cell size, the intent. Just ask about the evidence itself. 11 CO-CHAIR CROOKS: Right. 12 Do the 13 developers have any comment? So, again, we --14 DR. DAHLERUS: because the thresholds of 1.2 are based on the 15 16 evidence cited in the individual measure, we would argue that this also applies to the 17 18 combined measure. I think the discussion 19 yesterday about the combined PD measure also 20 applies here, whether there are any concerns about the values for adult somehow masking the 21 22 result for the pediatric population. But, again,

that would probably be less the case given the 1 2 slightly larger HD population. DR. KRISHNAN: And I have scrolled 3 down to validity, but was this discussed at the 4 TEP, this combined measure? 5 DR. DAHLERUS: Not the combined 6 7 measure. The individual measures were, though. CO-CHAIR CROOKS: Alan? 8 9 DR. KLIGER: And just to clarify, the 10 three or four treatments a week is true for both adults and children? 11 Just children. 12 DR. DAHLERUS: No. 13 CO-CHAIR CROOKS: Okay. Any other 14 comments? 15 DR. KRISHNAN: So, Frank and others, 16 how did you guys rate the evidence for this? DR. MADDUX: So having been on both 17 18 1423 and 2703, the same issues apply predominantly to the pediatric application. 19 So 20 for the adult portion, I think the evidence is pretty good, and that would be either high or 21 22 moderate. For the pediatrics, my thought is that

this is suspect because of the same discussion we 1 2 just had. How do you synthesize 3 DR. KRISHNAN: the two of those in one measure? Is that --4 DR. MADDUX: I think the flaw in the 5 measure, as a combined measure, has to be the 6 7 same flaw as the least common denominator of the two -- of both measures. 8 9 DR. KRISHNAN: Agreed. 10 CO-CHAIR ANDERSON: And I quess from 11 my perspective, if you have a separate measure 12 for pediatrics and a separate measure for adults 13 -- and, again, I'm not really sure what you gained by combining the measures into another 14 15 measure unless you are able to harmonize the 16 measures at the very end. So I was struggling with all of the 17 18 different measures. And then combining them into one where the evidence for the pediatrics is what 19 20 we want there, certainly very strong evidence for the adults, but the pediatric evidence, even in 21 22 the guidelines, was a grade C.

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1	CO-CHAIR CROOKS: Okay. Other
2	discussion? Measure developers.
3	CO-CHAIR ANDERSON: Let's get the
4	committee
5	CO-CHAIR CROOKS: Yes. I'm sorry.
6	Lori?
7	MS. HARTWELL: To my understanding,
8	combining the measures was to pick up the extra
9	11 kids that would not be normally measured. Is
10	that correct? The reason for this?
11	DR. DAHLERUS: Correct. Yes. So more
12	facilities and more children will be evaluated in
13	the combined measure.
14	CO-CHAIR CROOKS: Mahesh?
15	DR. KRISHNAN: And this is just why I
16	struggle, right? I mean, the difference between
17	I get the policy objective. It makes complete
18	sense to me. I just don't get the evidentiary
19	basis for the construction of that. If there was
20	an attachment, there wasn't there isn't strong
21	enough evidence, if we're just evaluating I'm
22	assuming we're just evaluating it based on the

evidence and not on the policy implications. 1 2 CO-CHAIR CROOKS: You dropped your card. 3 DR. KRISHNAN: Yes. 4 5 (Laughter.) CO-CHAIR CROOKS: Don't say I'm not 6 7 observing things up here. Okay? Any other discussion about the 8 9 evidence before we vote? Yes, Michael. DR. SOMERS: You know, just all the 10 discussion about the evidence and as it pertains 11 I mean, some of it is focused on the 12 to kids. 13 four time a week, but, again, as I said before, I mean, where actually, if you are meeting this 14 15 criteria with four time a week dialysis, you are 16 exceeding adequacy standards. So, you know, as a quality measure, 17 18 this is ensuring that you are giving good care to 19 those children. So, you know, I wouldn't use 20 that necessarily to speak against this measure from an evidence standpoint. 21 DR. KLIGER: And while I understand 22

and respect what you say, Michael, I also want to point out that as written it would be a disincentive to increase the frequency of dialysis. If you have a borderline child who is not meeting the 1.2 standard single pool on three times a week, if you wanted to meet the standard you would not be able to increase the frequency.

B DR. SOMERS: I think if you were to look at that five or six percent of children who are dialyzed four times a week, they are being dialyzed four times a week for volume issues. And so, you know, in terms of the amount of clearance you're getting, you're far exceeding what you ever need.

15 DR. MADDUX: If I could comment, too, 16 Michael, the way I look at this is we have a particular set of measures here, and we have 17 18 opportunities through the process to get it 19 right. Rather, in my opinion, get it right or as 20 right as we can understand it, than to try to say it's right enough, because I do think as we went 21 22 through previously there are multiple ways in

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which to not diminish the opportunity to look at 1 2 the pediatric population and those on dialysis, and yet also not have some of the issues with the 3 particular measures. 4 CO-CHAIR CROOKS: Okay. It looks like 5 we're ready to vote on the evidence. 6 7 MS. OGUNGBEMI: The committee is now voting on evidence for Measure 2703. The options 8 9 are one, high; two, moderate; three, low; and, 10 four, insufficient. Voting is open. 11 MS. BAL: We're contacting IT about that, but that screen is available. 12 13 CO-CHAIR CROOKS: So unlike the last one where we voted no, this is a gray zone. 14 It's 15 above 40 percent, with a one or a two. 16 MS. OGUNGBEMI: The results are zero votes high, 10 votes moderate, nine votes low, 17 18 and four votes insufficient. So the measure is 19 gray zone, Measure 1423. 20 CO-CHAIR CROOKS: Thank you. Sorry I got ahead of you. Just doing numbers today. 21 22 Okay. So I think we don't need to

vote for exception in this case, or maybe we do 1 2 just for insurance. I don't know. MS. BAL: 3 No. CO-CHAIR CROOKS: No. 4 MS. BAL: We would move forward as if 5 this measure had been accepted. 6 7 CO-CHAIR CROOKS: Okay. So we'll continue this gray zone measure and go on to the 8 9 performance gap. 10 DR. MADDUX: So the gap -- the 11 discussion of the gap recognized the data for both the CROWNWeb and the Medicare claims data, 12 13 and the performance of the elements, the pediatric element and the adult element. I don't 14 15 think there was substantial disparity recognition 16 there. And the comments of this measure 17 18 surrounded the similar comments that we have had 19 related to the predominant driver of this 20 aggregate measure being adults, because of the number of patients, questioning whether it has 21 22 topped out, knowing that independently the adult

looked like there was not much of a performance 1 2 gap, and there was a mild to moderate performance gap in the limited number of patients tested in 3 the pediatric population. 4 CO-CHAIR ANDERSON: No further 5 comments, other than the risk adjustment. 6 There 7 was not significant -- and it does, in the 2015 QIP, it is at -- Kt/V is at 98 percent. 8 9 So, again, there is little room for 10 performance improvement in the adult population. And I think that's one of the difficulties in 11 combining the measure is that you have -- the 12 13 adult population really is pretty well topped out and has shown increased improvement. 14 15 CO-CHAIR CROOKS: All right. Other 16 comments about the performance gap? DR. KRISHNAN: Frank, is this the 17 18 exact -- Connie, is this the exact same number 19 for the performance gap from the adult measure? 20 It seems like it, right? The 93.5 percent? CO-CHAIR ANDERSON: 21 In the 2015 QIP, 22 it is 98 percent.

DR. KRISHNAN: No, I understand. But
in the performance gap for this measure, the
combined measure compared to just the adult
measure
CO-CHAIR ANDERSON: Oh, yes.
DR. KRISHNAN: it is the exact same
number?
DR. MADDUX: So, Mahesh, I did not
interpret this as being the aggregate, at $93-1/2$ ,
that as being the pediatric. I may be wrong, but
DR. KRISHNAN: It is just the adult,
again, so that is the exact same number. So you
don't have a gap for the combined?
CO-CHAIR ANDERSON: I think the 93-
point is the 2013 percentages and is the gap
analysis combined.
CO-CHAIR CROOKS: Yes. Can you
clarify what the gap for this measure was when it
was determined?
DR. DAHLERUS: So in the section on
meaningful differences, we do show that about 15

percent of facilities are performing worse than 1 2 expected, and that would -- and so we provide that in the meaningful difference analysis. 3 CO-CHAIR CROOKS: Right. 4 DR. DAHLERUS: And just to clarify, 5 this combined measure is not implemented in the 6 7 QIP. CO-CHAIR CROOKS: Do you have a mean 8 9 performance and a percentage? 10 DR. DAHLERUS: Ninety-three percent. 11 CO-CHAIR CROOKS: Yes. That's what I 12 -- okay. This measure is at 93 percent. They 13 can calculate outliers, you know, statistically, but the mean is 93.5 percent. 14 15 Okay. Other discussion on the gap? 16 Let's vote. Okay. MS. OGUNGBEMI: The committee is now 17 18 voting on performance gap for Measure 14 -- or 19 2703, pardon me. The options are one, high; two, 20 moderate; three, low; and, four, insufficient. The voting is open. 21 22 Results are one vote high, eight vote

moderate, 11 votes low, and three votes 1 2 insufficient. And the measure does not pass on It's Measure 2703. 3 performance gap. CO-CHAIR CROOKS: Okay. So that puts 4 it in the category of possibly being eligible for 5 So we will continue. 6 reserve status. 7 MS. BAL: If the committee would like to consider it for reserve, we can do a hand 8 9 But it does not have to be considered in vote. 10 that manner. So it would be more, do you feel that this should be a candidate? If not, this 11 measure will fall here, and we will move on to 12 13 the next one. So I have one question. 14 DR. MADDUX: 15 A measure that has never actually been used can 16 be put in reserve? It's like being the designated hitter forever. 17 18 (Laughter.) 19 CO-CHAIR CROOKS: Sarah? Can you help 20 us with this question? We have even managed to baffle Sarah. All right. 21 Very good. 22 DR. ANDRESS: So I think Okay. Sure.

from a certain standpoint it makes some sense. 1 2 And we talked about the adult measure going -- as possibly going into reserve status as a candidate 3 You know, and the reasons, of course, for that. 4 for that measure also apply here because the vast 5 majority of the denominator in the combined 6 7 measure is driven by that measure. So it makes a certain degree of sense. 8

9 And I think the classification for why 10 it would -- if you think of it as an ultimate 11 potential replacement measure, then certainly that makes sense, because the same reason for 12 13 having the measure in place still stands.

You know, there is the additional 14 15 concern of course of the specifications for the 16 pediatric population that are combined within the measure, but I think that is a separate issue 17 18 from whether or not it should be considered for 19 reserve status, you know, of course pending the -20 - pending our efforts to kind of resolve and get back to you the specification issues. 21

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I mean, I think, you know, the purpose

ultimately of this measure is to take on the -you know, to generally take on the same role as the measure that is going into reserve status, and so I think it makes sense to consider it for reserve status on that basis.

I don't know procedurally if NQF would 6 7 allow for that, but I think it's -- you know, I mean, in some ways, you know, we propose it here 8 9 as a distinct measure, or we present it here as a distinct measure because, you know, there are the 10 11 measures implemented, and we wanted to ensure that we retained a continuity of endorsement 12 13 status if the combined measure was not something that the panel was willing to consider. 14

But it can also be considered a modification of the existing measure to try to address at a particular policy need. At the end of the day, it is addressing -- it is assessing the adequacy of dialysis received by these populations.

You know, if that is something that we
consider to be an important measure of quality

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that goes forward, even given the high level of performance in the overall population, then I think the reserve status -- I think it makes sense. And, again, you know, it's -- whether or not NQF can support that, I -- you know, I leave that to Sarah to respond.

MS. SAMSPEL: So I'll ask Michael to make his comment, and we are still gathering our responses.

DR. FISCHER: If I could just a quick -- I mean, I looked at the -- because we looked at this yesterday, the NQF documents, and going to Franklin's point it says this is for -talking about retaining endorsement.

15 And, specifically, there is a line in 16 here that says, "Would not grant an active endorsement status for a measure that has not 17 18 been used." This measure has not been used 19 So I guess, if I understand your own before. 20 documentation correctly, kind of -- this isn't possible in this situation with a composite 21 22 measure that has not been promulgated and used

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previously.

2	MS. SAMSPEL: So I think technically
3	we could argue both ways. This is unprecedent-
4	setting. You know, I really we don't have a
5	precedent to go back to on this one. But we have
6	the issue of a component of this measure is an
7	endorsed NQF measure that you earlier voted
8	reserve status.
9	The other portion of this measure,
10	another component of this measure, you know, is
11	in gray zone because that was the one that you
12	know, and thus has not is not implemented or
13	not endorsed.
14	And so and really going back to
15	what, you know, you just pulled out as well,
16	Michael, is, you know, I in light of the fact
17	that the second component of the measure actually
18	has to come back to revote as well, I mean, what
19	I really would do is not deal with reserve status
20	right now at this meeting until we can deal with
21	the rest of the measure issues through the public
22	comment period and through post-public comment

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voting on the second half of the measure. 1 2 CO-CHAIR CROOKS: Well, I don't know about you guys, but I'm getting dizzy. So then 3 at this point, then, we'll stop considering this 4 measure, as I understand it, and move to the 5 6 next. 7 That cleared my head. Okay. 2705 is the next measure. This is, as 8 9 we know, a CMS measure combining other measures. 10 So if you are ready to -- are you ready to go 11 ahead? 12 DR. DAHLERUS: Yes. 13 CO-CHAIR CROOKS: Okay. 14 DR. DAHLERUS: Yes, we're ready. Are 15 we ready? Okay. So, again, in the interest of 16 time, just to clarify. So this is the overall combined dialysis adequacy measure. So it's a 17 18 combination of each of the individual measures 19 that we have discussed in the past two days. 20 And so this is -- and, again, the intent here was to include as many patients and 21 22 facilities and the assessment of adequate

dialysis. So it's a combination of the
respective pediatric hemodialysis and peritoneal
dialysis adequacy measures, and then the
respective adult HD and PD measures as well.
This is the combined measure is a
new measure, and it has not been implemented in
Dialysis Facility Compare or QIP. And, again,
the stipulation about the upper threshold is
something that will also be revised for this
overall combined measure.
And in terms of the evidence that we
summarize in the evidence form, the evidence
draws on specific minimum thresholds for each of
the distinct populations.
CO-CHAIR CROOKS: All right. Our
primary reviews are Alan and Elizabeth. Who
would like to kick it off?
DR. KLIGER: Yes. So there are two
facts about this measure that are I think
different than the others. It obviously has the
same issue that we have just spent the last
torturous two hours talking about. But, in
concurous two nours carking about. But, in

addition, if you look carefully at what they have
said, the denominator statement says for adult
hemodialysis patients receiving dialysis,
excluding those who receive dialysis less than
three or greater than four times a week. So this
does include indeed adults getting four times a
week dialysis.

The other thing to note that is 8 9 somewhat different is unless I misread this, it 10 does not exclude home dialysis patients. And if it does not, then there have been, as we all 11 know, an increasing number of adults and kids, 12 13 but mostly adults, who are dialyzing at home with much higher frequencies, five, six times a week 14 15 treatments using equipment that facilities that.

16 So the evidence issues are the same 17 here, except that it does include adults on 18 variable frequency of dialysis, and includes a 19 larger -- you know, larger than a minimal number 20 of adults for whom that really is an issue. 21 The evidence is the same evidence, and 22 I hate to go through it again. It really is the

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1	same, and I think the fatal flaw is the same one.
2	MS. EVANS: I have nothing else to
3	add, but I would like to ask, could we not, to
4	save time, put this on hold right now? I mean,
5	it's the same issue that we had before, rather
6	than going through all of this again?
7	DR. DAHLERUS: So the denominator
8	exclusions state that adult HD patients receiving
9	less than three or greater than four four or
10	greater times weekly dialysis are excluded. So
11	they are not included in the denominator.
12	DR. KLIGER: Correct. That's what I
13	said. Greater than four is excluded; four is
14	included, not excluded. It's not greater than or
15	equal to four. The specification says greater
16	than four.
17	DR. DAHLERUS: So we apologize. That
18	is something that was not clearly stated in the
19	denominator. The statement for the denominator
20	does limit it to thrice weekly.
21	CO-CHAIR CROOKS: Yes. I agree with
22	Alan's reading. It doesn't say excluding four or

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greater; it says excluding greater than four. 1 2 DR. KLIGER: Correct. CO-CHAIR ANDERSON: Okay. I think 3 what has happened is there is a discrepancy in 4 what they wrote, because in the denominator 5 statement they do say thrice weekly for the 6 7 adults. But in the denominator exclusion, which is where the discrepancy is, it says greater than 8 9 four times a week. So you can't -- they're 10 inconsistent. CO-CHAIR CROOKS: So we've had a 11 12 request to shorten the process, if possible. I'm 13 not sure how we can -- does the staff have suggestions on how we --14 15 MS. BAL: I mean, we can just advise 16 the committee not to rehash issues that have already been rehashed and just speed to the vote. 17 18 But we do need to vote on this measure. 19 CO-CHAIR CROOKS: Okay. Thank you. 20 So is there further discussion on the evidence before we vote? Okay. 21 Let's vote. 22 MS. OGUNGBEMI: The committee is now

voting on Measure 2705, evidence. The options 1 2 are one, high; two, moderate; three, low; and, four, insufficient. Voting is open. 3 Results are zero votes high, four 4 votes moderate, 12 votes low, and six votes 5 insufficient. Measure 2705 does not pass on 6 7 evidence. CO-CHAIR CROOKS: So that brings us 8 9 back to the possibility of an exception. Does 10 anyone want to propose that and make the case for 11 that? Okay. So that being the case, I think we can 12 13 end discussion of this measure at this point. 14 Okay, Elizabeth? 15 All right. So I have good news for 16 It's break time. We are going to come you. back, and then we are going to jump into the 17 18 related competing measures for all of the Kt/V 19 And we'll be moving on to -measures. 20 CO-CHAIR ANDERSON: We are not going to be doing the related and competing --21 22 CO-CHAIR CROOKS: Oh, we're not. Oh.

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## Because?

2	MS. SAMSPEL: So the issue, if you'll
3	the issue with related and competing measures
4	is that they are only discussed for the measures
5	that have been recommended for endorsement. So
6	we have measures that both failed and went into
7	gray zone or consensus has not been reached.
8	So we will be taking that offline, and
9	the related and competing discussion will happen
10	post comment, post public comment, and those
11	calls. So when we come back, we will be jumping
12	into the next set of measures.
13	CO-CHAIR CROOKS: Thank you for
14	clarifying.
15	Okay. So our break is scheduled for
16	15 minutes, which would get us back at 10:05.
17	Thank you.
18	(Whereupon, the above-entitled matter
19	went off the record at 9:50 a.m. and
20	resumed at 10:04 a.m.)
21	CO-CHAIR ANDERSON: We're going to
22	change the order of the agenda a little bit

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because of the developers that are available to 1 2 us. So, instead of starting with 1424, we're going to start with 1667, then do 1660, and then 3 go back to 1424 and start there. So, Dale and 4 Amy. 1667. 5 MS. BECKRICH: So, we should have 6 7 Barbara Fivush on the line, and she's going to introduce 1667. 8 9 DR. FIVUSH: Thank you. This is Barbara 10 Fivush. Can everybody hear me? 11 CO-CHAIR CROOKS: Yes, Barbara. DR. FIVUSH: All right, thank you. So, 12 13 1667 is a Pediatric ESRD Patients Receiving Dialysis Hemoglobin less than 10 measure. It's 14 15 the percentage of calendar months within a 12-16 month period during which patients aged 17 years and younger with a diagnosis of ESRD receiving 17 18 hemodialysis or peritoneal dialysis have a hemoglobin level less than 10. 19 20 The rationale for this measure is that in pediatrics, as you all know, anemia is a major 21 22 complication of ESRD in children. And the anemia

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is associated with cardiovascular dysfunction, cardiomyopathy, and death. Correction of anemia in children has been shown to improve cardiac dysfunction, exercise tolerance, and reduce left ventricular hypertrophy.

We also strongly weigh the potential 6 7 quality of life benefits that correction of anemia will bring, and the available literature 8 9 in adults should be enriched by consideration of 10 quality of life measures that are critical to 11 children, including neurocognitive development, 12 school attendance, exercise capacity, and family 13 support.

The measure has recently been 14 15 reclassified as an intermediate outcomes measure, 16 and it is a physician-level measure. Currently, it is being measured in PQRS, and included in the 17 18 RPA Kidney Quality Improvement Registry for 2015. 19 There is some strong evidence for this 20 measure. Their KDOQI Clinical Practice Guidelines, 21.1 in particular, which say the 21 22 lower limit of hemoglobin which is fully

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applicable to children in patients with CKD, the 1 2 hemoglobin level should be 11 or greater, and that's a very strong recommendation. 3 So, Pediatrics feels strongly. This 4 has been approved in the past but this measure 5 should be reapproved, and agree with the 6 7 reclassification, as you believe that measurement of hemoglobin is critical to insure the best care 8 9 for children with ESRD on peritoneal and 10 hemodialysis. CO-CHAIR CROOKS: Okay, thank you. The 11 discussants are Bobbi Wager and Frederick Kaskel. 12 13 Have you decided who's going to be on first? MS. WAGER: Yes, this is Bobbi. I will 14 15 go ahead and start. Thank you, Barbara. She did 16 an excellent job. The evidence, as she pointed out, the KDOQI Guidelines, and the data also 17 18 comes from different patient registries and 19 cohort studies demonstrating the adverse effects 20 of anemia. We all know, as she stated, cardiovascular disease, et cetera. 21 22 Myra, do you have anything else that

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1	oh, I'm sorry, it's Dr. Kaskel.
2	DR. KASKEL: It's a very important
3	measure, obviously, as Barbara has summarized
4	very nicely.
5	CO-CHAIR CROOKS: I have a comment,
6	that the measure calls for hemoglobin less than
7	10. The guidelines state the target should be
8	between 11 and 12. And is there justification in
9	the evidence why that particular number is
10	targeted? Michael.
11	DR. SOMERS: So, there is evidence in
12	children with CKD and ESRD that hemoglobin values
13	less than 10 are associated with higher rates of
14	hospitalization, higher rates of mortality, as
15	well as the quality of life standards, and the
16	cardiac effects that have been discussed
17	previously.
18	CO-CHAIR CROOKS: Okay, that's that
19	evidence wasn't, I don't think, in the
20	submission, but duly noted. So, that as a
21	pediatric nephrologist you think the number 10 is
22	valid, or is a good choice?

DR. KASKEL: I believe it's a good 1 2 choice and, if anything, we tend to even think about higher levels depending on the age and 3 conditions. Neurocognition are very difficult 4 area to measure and quantify, needs to come into 5 this picture, as well, at certain periods of 6 7 development. And there may be racial disparity issues. 8 9 DR. SOMERS: And even though that's ---10 the evidence supporting less than 10 isn't 11 provided specifically with this measure, but it's 12 going to come up in 1424 when that evidence was 13 actually given. 14 CO-CHAIR CROOKS: Very good. 15 MS. WAGER: Peter, can I make a 16 comment? On our conference call, I believe the developer was asked why below 10, and I believe 17 18 they said something about they wanted a floor 19 level, or the bottom level. That's why it was 20 below 10. CO-CHAIR CROOKS: Right. I was just 21 22 wondering if there's also data or medical

evidence that, you know, makes that appear to be 1 2 the right target. Lorien, you have your card up. DR. DALRYMPLE: Can I just clarify from 3 the work group how they graded the evidence using 4 the NQF Criteria? Was this a clinical practice 5 recommendation from KDOOI? That's just what I 6 7 wrote in my notes, but I'd like to clarify how the evidence rated by NQF criterion? 8 9 CO-CHAIR CROOKS: Do you remember what 10 grade level it was assigned? I can ---11 MS. SAMPSEL: I don't necessarily that 12 in each of the work groups that the Committee on 13 the work group call that they went through the official process. I mean, what I would ask though 14 15 is that, you know ---16 DR. DALRYMPLE: What are their thoughts after discussion ---17 18 MS. SAMPSEL: The Committee members who 19 looked closely at this, did you have any thoughts 20 on that? DR. DALRYMPLE: Yes, did you think this 21 22 was perhaps insufficient because of pediatrics

and the challenges around it, or was there a higher grade? And we've talked about insufficient with exception because we think it's important, but I just was hoping to get those who looked at in depth for their sense of where this fell on evidence.

7 DR. SOMERS: In terms of the level being less than 10, I do think there is specific 8 9 pediatric evidence that supports the adverse 10 effects of your hemoglobin being less than 10, 11 and that mark is supported by pediatric evidence. CO-CHAIR CROOKS: According to the 12 13 submission, the grade from the KDOQI process was moderately strong, which is their second-level 14 15 grade. 16 Let's see. I think Michael Fischer was

17 next. That was accidental card turning. Dr.18 Wagner.

DR. WAGNER: Thank you. Just so I understand the process; if the evidence is not in this particular submission, even though it is in another submission, does --- are we allowed to

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then consider that, or are we obliged to follow 1 2 what has been in this submission? CO-CHAIR CROOKS: I would say that when 3 it comes to evidence, in our past discussions, 4 Sarah, we heard that if the Committee is aware of 5 other evidence that bears on the measure, that 6 7 it's okay to consider it at this level. That may not be true when it comes to other parts of the 8 9 submission, but I think if you're aware of 10 evidence that supports it, you can use that in 11 making your reasoned judgment. Okay? Mahesh. MS. HARTWELL: I had my ---12 13 CO-CHAIR CROOKS: Oh. Well, I'll call on Mahesh first, because I'm the Chair. I can do 14 15 that. No, I'm sorry. I didn't see Lori. 16 MS. HARTWELL: I think you're ignoring 17 me. 18 CO-CHAIR CROOKS: You're just --- when 19 I have my glasses --- okay, Lori. 20 MS. HARTWELL: I just had a quick question because it talks about transfusion 21 22 avoidance, but also it doesn't make mention of,

you know, when children get blood transfusions, 1 2 it's more difficult to transplant. And I just wanted to have any comments from the Committee 3 about that, because it's a very serious issue for 4 children if they get transfused. 5 CO-CHAIR CROOKS: What about the impact 6 7 on blood transfusion, pro or con, does it work against that? 8 9 DR. KASKEL: We would really worry 10 about having to transfuse with the attendant risks of infection, but also the need to keep 11 them less sensitized for transplant for sure. We 12 13 would want to avoid that at all costs. 14 CO-CHAIR CROOKS: Does the measure push 15 from --- end up causing more transfusions because 16 of that floor, than maybe you would do otherwise? DR. KASKEL: Well, this is a big issue 17 18 to consider down the line. If the Pediatric 19 Centers caring for the children would want to 20 keep the level, if anything that would be the minimum level here at this floor, but be higher 21 22 to avoid the need for transfusion.
CO-CHAIR CROOKS: So, if you have a 1 2 ESA-resistant child and the hemoglobin is 9, you're going to have to transfuse him, probably. 3 DR. KASKEL: In rare instances, if you 4 can't correct the resistance and they're 5 symptomatic, you would. 6 7 CO-CHAIR CROOKS: So you try everything you can to avoid it, obviously. 8 9 DR. KASKEL: Right. 10 CO-CHAIR CROOKS: Yes, Josh? 11 DR. ZARITSKY: And, ironically, it's 12 usually an upper limit that leads to this type of 13 thing because no one is going to transfuse a patient to make a recommendation. Do you know 14 15 what I mean to say? Oh, my God, you know, I'm not 16 going to make my, you know --- whatever you want 17 to say, and then transfuse the patient. Whereas, 18 if you look at probably the effects of the upper 19 limit, that might actually have a little bit more 20 of a significance, or the range that you're trying to keep the patient in rather than the 21 22 lower limit. I hope that helps.

<ol> <li>CO-CHAIR CROOKS: Rick.</li> <li>DR. KASKEL: I just want to mention</li> <li>that this area of anemia in CKD in children is</li> <li>being actively studied through some cohort</li> <li>studies. And the CKiD Study, Chronic Kidney</li> </ol>	
3 that this area of anemia in CKD in children is 4 being actively studied through some cohort	
4 being actively studied through some cohort	
5 studies, And the CKiD Study, Chronic Kidney	
6 Disease in Children, is one of the main ones.	
7 This is for children with CKD Stage 2 and 3, an	
8 anemia is one of the major comorbidities that's	
9 being evaluated in terms of progression of kidn	ey
10 failure, neurocognition, growth, and	
11 cardiovascular risks, so it's an active, ongoin	a
12 collaboration of most of the large pediatric	
13 centers across the country, something like 600.	
14 So, it's	
15 CO-CHAIR CROOKS: Okay, good to know	•
16 DR. KASKEL: a work in progress	
17 that you need to know that from our standpoint,	
18 the information that we're getting about	
19 appropriate targets at least in CKD is accurate	•
20 CO-CHAIR CROOKS: Okay. Mahesh.	
21 DR. KRISHNAN: I just had a question	
22 for the pediatricians. Anemia management in	

adults has clearly got a seismic shift in the last four or five years. The guidelines that are referred predate that. I don't know enough to know enough about how much that's impacted the pediatric guidance. Could you guys help us with that?

7 DR. KASKEL: This is a concern because when the black box warning came out, you know, 8 from the two studies; obviously, not including 9 10 children, it --- we were concerned that it would set a level lower for our field. And there are no 11 randomized controlled trials of target ---12 13 adequate target levels in pediatric nephrology for the hemoglobin for ESA, that's one. And the 14 15 rate of rise of hemoglobin is another 16 consideration which in the adult studies was one of the major factors for the cardiovascular 17 18 morbidity. We have no idea in children whether 19 the rate of rise of hemoglobin is a risk factor, 20 so there's a lot of unanswered questions about this. And the black box warning did siphon down 21 22 to us, and knowing that we may need a higher

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hemoglobin in some children for growth. Okay, so 1 2 it's a concern. DR. KRISHNAN: Is it accurate to say 3 that there wasn't really much of a --- you guys 4 didn't extrapolate anything from the adult 5 studies to kids with all the shifting? 6 7 DR. SOMERS: In terms of the higher limit, I mean, there's absolutely no data 8 9 whatsoever in children that having a hemoglobin above 12 results in any sort of adverse outcome. 10 And unlike the adult data, there is specific data 11 showing that hemoglobin less than 10 results in 12 13 adverse outcomes in children. 14 CO-CHAIR CROOKS: Okay. 15 DR. SOMERS: Specifically, that level 16 of 10. CO-CHAIR ANDERSON: I'm trying to keep 17 18 the discussion to what we need in order to vote. 19 Dr. Wagner. 20 DR. WAGNER: Quick question. So, are the data specific to ESA treated patients or all 21 22 comers?

DR. SOMERS: The data that --- less 1 2 than 10 dealt with kids with CKD. I'm not sure what proportion of them were receiving ESAs, but 3 as common practice, since in general pediatrics 4 there's evidence that any normally healthy child 5 having anemia results in all kinds of adverse 6 7 outcomes that pediatric nephrologists tend to start treating when we start to see anemia. 8 9 CO-CHAIR CROOKS: Okay. I don't see any 10 other cards up, so let's vote on the evidence. MS. OGUNGBEMI: The Committee is now 11 12 voting on Measure 1667's evidence. Options are 1 13 high, 2 moderate, 3 low, and 4 insufficient. Voting is open. The results are five votes high, 14 15 13 votes moderate, three votes low, and one vote 16 insufficient. Measure 1667 passes on evidence. 17 CO-CHAIR ANDERSON: Okay. Bobbi, on the 18 gap. 19 MS. WAGER: The performance gap 20 included, for instance, racial disparity because it's such a small scale, a small size sample of 21 22 patients that it was difficult to differ

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treatments with the gender, the patient's gender, 1 2 age, and race. 2008 CMS PQRI data is showing about a third of the patients not meeting the 3 goal, and 2010 Elab data provided showing that 20 4 percent of pediatric patients have hemoglobin 5 values less than 10. And that proportion 6 7 increased a bit over 2009. But, again, the performance does not include really a thorough 8 9 investigation due to the small sample size. 10 CO-CHAIR CROOKS: Rick, any other 11 comments on the gap? DR. KASKEL: No, there is clearly a 12 13 percentage of patients not meeting what we think is a target. That is somewhat of a concern to our 14 15 community, and even in the CKiD data set we found 16 a surprising number of patients in Stage 2 or 3 who were anemic and were not getting effective 17 18 treatment, so it's a concern. 19 CO-CHAIR ANDERSON: Okay, other 20 considerations on the performance gap? Lori. MS. HARTWELL: The data says 2008. What 21 22 year was the black box warning; so this data is

prior to the black box warning, so it might be 1 2 different. Is that correct? I was just saying the gap might be higher. 3 CO-CHAIR ANDERSON: If I'm reading this 4 right it says --- and, Bobbi, I'm probably ---5 this may be repetition, but the 50th percentile, 6 7 66.23, does that mean that's two-thirds of kids are below 10, or is that for the 10 to 20 ---8 9 maybe that's for the 10 to 20 range. Yes, 10 please. MS. SINGER: There was data from the 11 International Pediatric Peritoneal Dialysis 12 13 Network Registry of 1,394 pediatric patients showing that 25 percent of patients had 14 15 hemoglobin levels below the target. That's in the 16 evidence. DR. ZARITSKY: You have to --- I don't 17 18 want to argue against this, but the IPPM, you 19 know, International ---20 MS. SINGER: Right. It is international. 21 22 DR. ZARITSKY: They don't get --- they

don't have Epogen available, and there's a cost. 1 2 CO-CHAIR CROOKS: So, whether it's 15 percent or 16 percent, I guess there's a large 3 performance gap. Okay. Any other discussion on 4 the performance gap? I see voting machines in the 5 air. Let's do it. 6 7 MS. OGUNGBEMI: The Committee is now voting on the performance gap for Measure 1667. 8 9 Options are 1 high, 2 moderate, 3 low, and 4 10 insufficient. Voting is open. The results are for 11 performance gap, 10 votes high, 13 votes 12 moderate, zero votes low, and zero votes 13 insufficient. Measure 1667 passes on performance 14 gap. 15 CO-CHAIR CROOKS: Okay. Next up, 16 specifications and reliability. MS. WAGER: Okay. Reliability, measure 17 18 was tested at the critical data element level 19 using inter-rater reliability for medical culture 20 rater for the measure, where the patients were randomly selected from visits. For ESRD, they 21 22 used four nephrology practices in the Midwest,

the West, the East, and Southern. The number of 1 2 patients seen per month was averaged at 240 to 2,800. Sample size per physician organization 3 ranged from 24 to 30 for a total of 169 patients 4 on PD or hemo. 5 The data was collected from medical 6 7 records, data abstraction completed for multiple patient visits per patient for a total of 2,012 8 9 patient visits. Data abstraction was done in 10 2008, and testing results indicate from that 11 there's a high reliability. CO-CHAIR CROOKS: Okay. Rick, any other 12 13 comments on ---DR. KASKEL: No, that covers it. 14 15 CO-CHAIR CROOKS: The source of the 16 data is from CROWNWeb, or it's from some other --17 18 MS. SINGER: Chart extractions. 19 CO-CHAIR CROOKS: For the testing. 20 MS. SINGER: Yes. CO-CHAIR CROOKS: But, in general? 21 22 MS. SINGER: PQRS.

1	CO-CHAIR CROOKS: PQRS. Thank you.
2	Okay. Any other comments on specs reliability?
3	DR. DALRYMPLE: Can I ask a question of
4	either the
5	CO-CHAIR CROOKS: Oh, Lorien, sorry.
6	DR. DALRYMPLE: developers? Oh,
7	sorry, I thought you were
8	It was I think when I looked at
9	this, the reliability testing seemed to be the
10	same as the adult measure. So, can we get clarity
11	as whether the reliability testing occurred in a
12	pediatric population? And then I think the kappa
13	I saw was for a plan of care for anemia measure,
14	and is that the same as a hemoglobin less than
15	10? And maybe I'm missing the hemoglobin less
16	than 10 kappa, but I was just hoping for clarity
17	on the reliability testing.
18	MS. SINGER: Yes, we did not test this
19	in pediatric practices, so it's the same testing
20	that was done for the other measures.
21	CO-CHAIR CROOKS: Is there any reason
22	to think the reliability testing would be
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different if you'd done it on pediatric patients? 1 2 Why is the sky blue? Oh, we know that 3 DR. DALRYMPLE: Can we discuss it as a 4 Committee whether that changes things for anyone, 5 the lack of pediatric sampling, or the kappa is 6 7 on a plan of care for anemia, as opposed to hemoglobin cutoffs, which is what I think the 8 9 focus is in this one? 10 CO-CHAIR CROOKS: I agree, it does 11 raise some questions. Michael. DR. FISCHER: Quite simply, the 12 13 reliability testing is supposed to be on the measure proposed. If it's not, I'm not sure how 14 15 it's germane to the application. 16 CO-CHAIR CROOKS: Other comments? DR. KASKEL: One of the deficiencies 17 18 already mentioned was the fewer numbers of 19 patients and inability to get any real signals 20 regarding gender and race, and certain periods of development like pre-pubertal/post-pubertal. 21 22 These are all lacking in the analyses. We don't

have enough patients entered. 1 2 CO-CHAIR CROOKS: Okay. Are we ready to vote? Reliability. 3 MS. OGUNGBEMI: The Committee is now 4 voting on reliability for Measure 1667. The 5 options are 1 high, 2 moderate, 3 low, and 4 6 7 insufficient. Voting is open. The results for reliability on Measure 1667 are one vote high, 8 9 eight vote moderate, four votes low, and 10 votes 10 insufficient. The measure fails on reliability. 11 It's Measure 1667. CO-CHAIR CROOKS: That's a critical 12 13 element, so do we stop at this point, or do we --14 15 So, we would like to offer the Committee the opportunity to provide additional 16 comments to the developer. 17 18 DR. KASKEL: I'm concerned about this 19 now, so I'd like to have a further discussion 20 about the reliability in detail. CO-CHAIR CROOKS: So, are you arguing 21 22 that the reliability was --- testing was

suitable? 1 2 DR. KASKEL: My comments about gaps related to need for further studies, just like 3 target hemoglobin and all the factors that go 4 into the distribution, racial, gender. But the 5 reliability of this assessment, I don't believe 6 7 was insufficient from the data source. That's a concern. 8 9 CO-CHAIR CROOKS: I need to make sure 10 I'm understanding you; that you think the 11 reliability testing is sufficient, or it is not sufficient? 12 13 DR. KASKEL: For this measure, it's sufficient. 14 CO-CHAIR CROOKS: You think it is 15 16 sufficient. I think to summarize the opinion I'm sensing from the Committee, that when you don't 17 18 test it on the target audience and show that your 19 bullet is hitting in the same place every time 20 because you're not even looking at that population, it's not being judged reliable. 21 22 That's my sense of it. Let's start with --- who's

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up first? Michael.

2	DR. SOMERS: It may not have been
3	tested on a target population, but I think it
4	would I'm not sure why doing record
5	abstraction looking at the same data element in
6	adults would be different in a pediatric
7	population at these facilities, as well. So, I'm
8	not sure the outcome of reliability testing, if
9	there were a pediatric cohort that could have
10	been tested, would have been any different than,
11	you know, this measure being tested in adults,
12	because the process is the same of looking at
13	something
14	CO-CHAIR CROOKS: Right, we hear you.
15	Yes.
16	DR. SOMERS: Yes.
17	CO-CHAIR CROOKS: Okay. Lori.
18	MS. HARTWELL: I just want to clarify,
19	we're just talking about testing hemoglobin.
20	Correct? That's the test. I mean, hemoglobin
21	CO-CHAIR CROOKS: No, the reliability
22	test is that the data elements, whoever finds

them, or whatever method they're found, they're 1 2 going to come out the same. MS. HARTWELL: So, can you explain that 3 to me just a little bit relating to hemoglobin? I 4 mean, is it the method --- I'm trying to 5 understand this one, because I'm like I don't ---6 7 CO-CHAIR CROOKS: Yes, it's beyond the 8 9 scope of my duties as Chair to explain 10 reliability beyond what I can, but the notion is 11 that the data elements are --- however they're 12 brought in, that they are accurate, that the 13 number --- it doesn't matter how high or how low the number is, it's that it's accurate time after 14 15 time it's being compared. 16 MS. HARTWELL: Just so I can understand the process, so the data elements, if it's 17 18 brought in an adult, they measure the hemoglobin, it comes in and it's the fact that it wasn't 19 20 measured on the pediatric patient the same number is making it not reliable? I'm just trying to 21 22 understand this. Is that ---

CO-CHAIR CROOKS: Well, we don't know 1 2 if it's reliable in the pediatric patients. We don't know if they're missing values. We don't 3 know that inter-rater reliability would have been 4 good. We don't know, because they didn't do it. 5 And that's causing us some --- giving us pause. 6 7 It's very important that if we endorse a measure, that it's reliable and valid. 8 9 MS. HARTWELL: Okay. 10 CO-CHAIR CROOKS: And that's part of 11 the NQF mission. Measures that matter, if they're not reliable and valid, why should we be putting 12 13 a lot of health care resources into making them better when we don't know that they work? 14 15 DR. FIVUSH: Can I speak as the measure 16 developer? 17 CO-CHAIR CROOKS: You may have a brief 18 comment. 19 DR. FIVUSH: I would strongly support 20 Michael's comments on this. There would not be a reason to believe that this would be different in 21 22 a pediatric or adult population, not the level of

hemoglobin, but the reliability of being able to 1 2 obtain the hemoglobin value that is accurate from chart abstraction. I can't --- I think that his 3 points are very valid, and there would not be a 4 particular reason, or any reason to assume that 5 this would be different if it was tested in the 6 7 pediatric population by chart abstraction. CO-CHAIR CROOKS: Okay, thank you. We 8 9 have other people who would like to speak. 10 Michael. 11 DR. FISCHER: I don't want to be too 12 rigid. I guess, my vote was informed by following 13 this algorithm, but perhaps I went to the boxes improperly. But given there's some concern about 14 15 reliability, as Lori mentioned, perhaps it would 16 be useful ---CO-CHAIR CROOKS: Yes. 17 18 DR. FISCHER: --- for us to --- which 19 I think is what you were going to do, anyway. 20 CO-CHAIR CROOKS: Can you step us through it really quickly, the recommended way to 21 consider it? 22

DR. FISCHER: Yes, so --- and I'll be 1 2 candid. I wasn't part of the working group for this measure, so I'm basing how I went through on 3 the preceding comments, but it's Algorithm 2, I 4 think that's page 12. 5 So, are submitted specifications 6 7 precise, unambiguous, and complete, they can be consistently implemented? Yes. So, I went to 8 9 number 2. Was empirical reliability testing 10 conducted using statistical tests that the 11 measure specified? No, because once again, that's 12 where I thought about the population thing, but I 13 don't --- once again, just trying not to make assumptions. Was empirical validity testing of 14 15 patient level data conducted? When I looked 16 quickly it was no, but I know we haven't talked 17 about validity yet, and that's how I wound up 18 with my vote. But, once again, I'm happy as 19 others look at this, I can be corrected, but I 20 was just going through this as to the NQF 21 process. 22 CO-CHAIR CROOKS: Okay, thank you.

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## Lorien.

2 DR. DALRYMPLE: Can I ask the developers a point for clarity? So, even if we 3 accept that perhaps there are no differences in 4 the adult --- in the pediatric population, the 5 one thing I want to make sure I understand is the 6 7 kappa that's provided for plan of care of anemia the same as this measure as specified percentage 8 9 with a hemoglobin less than 10, or is that 10 actually a different measure? 11 MS. SINGER: The plan of care was part 12 of the original measure. It's not part of this 13 current measure. And the current endorsed measure does not have a plan of care component, either. 14 15 So, I guess to clarify the reliability testing 16 issue, though, the process for testing the measure would be the same in the pediatric 17 18 population, and I just want to emphasize that 19 point. And the numbers of patients are so small 20 that the cost involved in the testing was placed in the larger population of patients so that we 21 22 could get larger numbers. But the process is the

1 2 same for testing.

2 DR. DALRYMPLE: But this kappa does not 3 apply to the measure as specified, even if we 4 negate the pediatric issue. Is that the correct 5 understanding?

MS. BECKRICH: So, the measure, I mean, 6 7 as it was tested would include the hemoglobin element as specified in the measure. And, in 8 9 addition, it included a plan of care element which was in the original, I think, 2007 version 10 11 of this measure, but that measure --- that 12 element of the measure was dropped when it was 13 brought before the NQF Committee last time, I believe 2012. So, the current endorsed measure 14 15 does not include the plan of care. 16 CO-CHAIR CROOKS: Frank.

DR. MADDUX: So, just to --- you had asked, Peter, if we'd make comments to the developers given the result of the vote, and it strikes me that what we're really talking about here is for reliability testing using a proxy. And you're using a proxy to --- so, part of the

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defense I think might be more than just 1 2 elucidating the data of the proxy, but why the proxy can be used in a valid way for reliability 3 testing on this particular measure, because a lot 4 of the kinds of things you're been talking. I 5 think if that path was laid out, there probably 6 7 would have been a different result. CO-CHAIR CROOKS: I think I'm sensing, 8 9 though, a request to re-vote on the specs and 10 reliability. Are there any objections to the Committee --- from the Committee to re-vote? 11 12 Okay, let's re-vote. 13 MS. OGUNGBEMI: The Committee is now voting on reliability for Measure 1667. Options 14 15 are 1 high, 2 moderate, 3 low, and 4 16 insufficient. Voting is open. The results are one vote high, 15 votes moderate, one vote low, and 17 18 six votes insufficient. The measure passes on 19 reliability. That's Measure 1667. 20 CO-CHAIR CROOKS: Should we make it two out of three? No? Okay, we'll go on. Validity. 21 22 DR. KASKEL: So, for the validity the

comments from the group were that incorrect entry 1 2 of data and codes, not following harmonized reporting at specific time points may have 3 affected some results. There's missing data. The 4 test sample is adequate, however, for widespread 5 implementation; however, normative adult data 6 7 should not be used for comparison to pediatric age, gender, and race specifications. 8 Medical record abstraction data from 9 10 over 2,000 patient visits showed appropriate 11 reliability for medical record abstraction. So, 12 moving forward with EHR, this can only improve, 13 especially with CROWNWeb. The panel thought this was high validity from the TEP. 14 15 CO-CHAIR CROOKS: Elizabeth, any other 16 17 Bobbi, sorry, Bobbi. 18 MS. WAGER: No, no more comments. 19 CO-CHAIR CROOKS: You're so far away. 20 Okay, other --- so, it was a TEP --- basically, it was based on TEP recommendation, the validity 21 22 argument. Any other discussion on validity? Okay,

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let's vote.

2	MS. OGUNGBEMI: The Committee is now
3	voting on validity for Measure 1667. The options
4	are 1 high, 2 moderate, 3 low, and 4
5	insufficient. Voting is open. The results are
6	three votes high, 18 votes moderate, zero low,
7	and one vote insufficient. Measure 1667 passes on
8	validity.
9	CO-CHAIR CROOKS: Very good. So, we're
10	up to feasibility. Bobbi or Rick?
11	DR. KASKEL: So, for the feasibility,
12	again this was electronic sources, data
13	collection, and care processing, so the
14	electronic reporting needs to be it was felt
15	needs to be more complete and uniform across
16	sites. Analyses of data needs to target specific
17	factors, such as, again, age, gender, and race,
18	and the normative same comments about
19	normative adult population data should not be
20	used to assess performance in the pediatric
21	population. And, again, this will improve with
22	electronic medical record, or electronic health

records. 1 2 CO-CHAIR CROOKS: Bobbi, any other thoughts; feasibility? 3 MS. WAGER: No comment. He said it. 4 CO-CHAIR CROOKS: And, again, this is 5 PQRS data, so it's submitted by physician 6 7 practices? MS. SINGER: Individual physician 8 9 providers. 10 CO-CHAIR CROOKS: Okay. Are we ready to 11 vote on feasibility? MS. OGUNGBEMI: The Committee is now 12 13 voting on feasibility for Measure 1667. The options are 1 high, 2 moderate, 3 low, and 4 14 15 insufficient. Voting is open. The results are for 16 feasibility 10 votes high, 13 votes moderate, zero votes low, and zero insufficient. Measure 17 18 1667 passes on feasibility. 19 CO-CHAIR CROOKS: Okay. Bobbi and Rick, 20 is it in use, and is it usable? DR. KASKEL: Sorry. This is a public 21 22 database and accessible because of that. And it's

--- the data can be used to determine anemia 1 2 management and records of deviation from expected norms can be used to investigate specific 3 etiologies of inadequate response to anemia 4 treatment, which is a good thing to have. And the 5 benefits, however, at present outweigh any 6 7 unintended consequences. We did also recommend that data provided more recent than 2010 would be 8 9 useful as we move forward; that it was transparent, as well. 10

11 CO-CHAIR CROOKS: Bobbi, anything else? 12 I think they stated in the submission that there 13 is evidence for improvement that the curve is 14 shifting to the right. Is that a result of their 15 measure? Maybe. Okay. Other discussion on 16 usability and use? Okay, I think we're ready to 17 vote.

MS. OGUNGBEMI: The Committee is now
voting on usability and use for Measure 1667.
Options are 1 high, 2 moderate, 3 low, and 4
insufficient. Voting is open. The results are 14
votes high, nine votes moderate, zero votes low,

and zero votes insufficient. Measure 1667 passes on usability and use.

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CO-CHAIR CROOKS: Okay. Before the 3 final vote to submit it for endorsement, open it 4 up for general comments. Just to summarize from 5 the pediatric nephrologist's point of view, maybe 6 7 if I can --- you can tell me if I'm right. You feel this is an important measure. It's the only 8 9 measure --- NQF measure relating to anemia management in children, and you think it's a good 10 11 measure. DR. KASKEL: I think it's very 12 13 important as we move forward. And I think we're on the verge of having more information regarding 14 15 the etiology of the anemia in certain groups, 16 such as with disparities. We have some information on hepcidin and racial disparities in 17 18 hepcidin and how that may affect anemia, and 19 cardiovascular and neurocognitive outcomes, and 20 growth. DR. SOMERS: And I think the fact that 21

it's very much data based with the target level

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of 10, is very important to the pediatric 1 2 community. CO-CHAIR CROOKS: Okay. Any other 3 comments before vote? Okay, let's do it. 4 MS. OGUNGBEMI: The Committee is now 5 voting for Measure 1667's overall suitability for 6 7 endorsement. The options are 1 yes, 2 no, and voting is open. The results are 20 votes yes, and 8 9 three votes no. The measure passes for meeting NOF criteria for endorsement. 10 11 CO-CHAIR CROOKS: Well, that was a 12 squeaker, but the process worked. Thank you. 13 Okay. We're going to move to Measure 1660, same developers, ESRD patients receiving 14 15 dialysis, hemoglobin level less than 9. 16 MS. SINGER: Okay, thank you. We have Paul Palevsky on the line, I believe, who's going 17 18 to introduce this measure. 19 CO-CHAIR CROOKS: Paul, are you there? 20 DR. PALEVSKY: I was trying to get an 21 open line, sorry. 22 CO-CHAIR CROOKS: Okay. We hear you. Go

ahead. 1 2 DR. PALEVSKY: Okay. I guess I now have the open line, so thank you. 3 This is Measure 1660, ESRD patients 4 receiving dialysis, hemoglobin level less than 9 5 grams per deciliter. The description of this 6 7 measure is percentage of calendar months within a 12-month period during which patients aged 18 8 9 years and older with a diagnosis of end stage renal disease who are receiving hemodialysis or 10 11 peritoneal dialysis have a hemoglobin level less than 9 grams per deciliter. 12 13 Our rationale for this measure is that it is intended to look at the outliers at the low 14 15 end of the hemoglobin distribution curve to 16 identify patients --- to identify quality of care of patients for treatment of anemia. 17 18 This --- establishing a threshold for a measure such as this has been somewhat 19 20 problematic. I appreciate that you just accepted the pediatric measure with the hemoglobin level 21 22 at 10. This measure in a prior iteration had not

been endorsed by NQF using a hemoglobin level of 10, and we have revised this with a threshold at 9.

We are not contending that 9 is some 4 absolute level at which a hemoglobin less than 9 5 is really bad, and above 9 is really good. That's 6 7 not what we're trying to establish here. We're trying to have a way of looking at the less ---8 9 if you're looking at a distribution curve, at the left side tail with the contention that the 10 11 larger the percentage of patients with a hemoglobin in that left-sided tail would 12 13 represent lower quality of care.

What we have noted is that over the 14 15 past several years there actually has been an 16 increase in the number of patients with hemoglobins less than 9, and there are also data 17 18 suggesting that there's an increase in transfusion rate associated with the changes in 19 20 ESA therapy. This, obviously, is an intermediate 21

outcome measure. It is included in the RPA Kidney

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Quality Improvement Registry for 2015.

2 The evidence supporting any specific threshold for --- at the lower end for 3 hemoglobin, we recognize is problematic, but the 4 KDIGO 2012 guidelines do suggest that for adult 5 CKD 5D patients, ESA therapy be used to avoid 6 7 having a hemoglobin concentration below 9 grams per deciliter by starting ESA therapy when the 8 9 hemoglobin is between 9 and 10. We know that from the Treat trial 10 11 which was designed to give rescue therapy when the hemoglobin was less than 9, that that 12 13 strategy of therapy of waiting until the hemoglobin of less than 9 was associated with an 14 15 increase in transfusion rates. So, we think that 16 this is an important safety measure for looking at the inadequate treatment of anemia. And, 17 18 hopefully, you will find that this is a worthy measure where you did not find it so with a 19 20 threshold of 10 when this was considered several 21 years ago.

CO-CHAIR CROOKS: Okay. Thank you very

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much. Our discussants are Michael Somers and Myra Kleinpeter. Who's going to go first?

DR. KLEINPETER: So, I'll start first. 3 The summary provided gives a good idea of the 4 rationale for the measure at this time. There's 5 significant evidence coming forward that levels -6 7 - hemoglobin levels less than 9 can lead to worse outcomes, increased risk of transfusions, and the 8 9 anemia guidelines from 2007 updates have a target range between 11 and 12, and then concurrently 10 with the implementation from some of the data we 11 have with the bundle payments there's been a 12 13 trend downward of the overall average hemoglobin such that they're having higher proportions of 14 patients with lower hemoglobins. 15

16 The first set of the information, also 17 from other member comments, specifies the 18 consequences of the lower hemoglobin may be 19 indirect, and also increase in risk of 20 transfusions which will impact candidacy for 21 kidney transplantation.

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Other information in terms of

performance gap, 38 percent of the patients do 1 2 not receive the target hemoglobin supported by national performance, disparities exist in 3 various populations, but there was insufficient 4 data available for suitable comparisons. And at 5 this time, some of the health disparities 6 7 primarily exist among African American patients, and Hispanic patients. This may be 8 9 multifactorial, but there are some disparities 10 with care. 11 CO-CHAIR CROOKS: Okay. So, we're on the evidence discussion. Michael, did you want to 12 13 add anything right now? DR. SOMERS: No. 14 15 CO-CHAIR CROOKS: Okay. So, we open it 16 to the Committee, discussing the evidence for 17 Measure 1660. 18 MS. WAGER: I have a comment. When we 19 talk about this less than 9, you mention adverse, 20 you know, effects, events, or whatever. I don't hear one word about quality of life for the 21 22 patient.

1	CO-CHAIR CROOKS: What would you like
2	us to know?
3	MS. WAGER: Well, you don't have one,
4	you know. Us professionals want the patient to
5	continue working while on dialysis with a
6	hemoglobin I remember dialyzing an 82 and my
7	hemoglobin was around then. I couldn't work. I
8	could just make a bed. So, I think that quality
9	of life has to be an important component.
10	CO-CHAIR CROOKS: Lori.
11	MS. HARTWELL: I would just state, I
12	would just double back. I remember I got two
13	units of blood every six weeks for pretty much my
14	whole entire age 12 to almost 23, and I would get
15	a blood transfusion at a 26 hematocrit, and one
16	time and I was telling I felt so bad at
17	that time, I would drink Big Gulps before they
18	drew my blood. And just to emphasize how awful
19	you feel, and that's about an 8, 8.5 hematocrit,
20	hemoglobin, excuse me. So, when you're at a 9, I
21	mean, this is such a safety issue for patients,
22	and I don't know if a lot of physicians today

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understand the true effects of how bad you feel 1 2 with anemia. And I think, you know, we get emails at our organization, patients tell us they don't 3 feel good. They're not even aware their 4 hemoglobin is making them feel bad, so there 5 needs to be more awareness to this. And it is ---6 7 I mean, we're doing all this so patients can live the life they were meant to live, and 8 9 hemoglobin and feeling good is such a big part of 10 that. 11 CO-CHAIR CROOKS: Thank you. And I believe that --- well, that may be addressed in 12 13 the body of evidence, is related to quality of life improvement. It should be. If it isn't ---14 15 DR. KLEINPETER: Some quality of life 16 information in terms in the references presented. CO-CHAIR CROOKS: Okay. So, that is 17 18 part of the evidence base, too, that we know that 19 keeping it above a threshold, and this is a low 20 threshold. Okay, Frank. DR. MADDUX: So, I'd only make one 21 22 comment. I mean, to me, this is a measure that's

a proxy for transfusion need. And the fact that there are no uniform transfusion policies in end stage renal disease patients makes it a little bit difficult to interpret how this might have unintended consequences.

My biggest concern about the less than 6 7 9 is the if used widely in the field, then suddenly it becomes a new target range. And that 8 9 instead of saying that 9 to whatever, or 10 to 10 whatever, it's pretty clear that the FDA guidance 11 has been without a range. And in some way we 12 might de facto create a range because of measures 13 specifically being used, and that might be an unintended result of what is a reasonable concern 14 15 here; and that is, that we begin to measure what 16 happens for people that have very low hemoglobins. So, it's --- I'm quite conflicted on 17 18 this particular area. 19 CO-CHAIR CROOKS: Thanks. Alan. 20 DR. KLIGER: Paul pointed out that there really is no consistent evidence for having 21

a cutoff period --- a cutoff for hemoglobin for

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adults. You guys did present some evidence for 1 2 children. Having had the opportunity to review all of this for a publication last year, I can 3 tell you that when you look objectively at it, 4 looking at a whole population, that there really 5 has been no compelling evidence that any specific 6 7 cutoff, that any specific level, risk is increased below a particular level. Rather, it 8 looks more likely that we need to be paying 9 10 attention to individual patients.

11 You know, what we've heard from our patients here is absolutely right, that there are 12 13 some individuals for whom a hemoglobin below 10 is impossible, and others who go and live really 14 15 very comfortably with hemoglobins of 8 or 8.5. I 16 have a real problem. And that's what the data show, so I have a real problem with a measure 17 18 that goes across the board giving an arbitrary 19 cutoff without any data suggesting that there are 20 adverse consequences of the hemoglobin below that 21 level.

CO-CHAIR CROOKS: Ishir.

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DR. BHAN: Yes, I would agree with 1 2 that. And, also, one of the comments earlier was that the goal was to --- well, one of the 3 potential adverse effects of being below 9 in, 4 for instance, Treat, was that there were more 5 transfusions. I think if anything, an unintended 6 7 consequence of this might be to increase transfusions, or maybe an intended consequence 8 9 depending on how you look at it. But, regardless, 10 an increase in transfusions as opposed to 11 emphasizing EPO, there's no particular reason this would shift people more towards EPO or to an 12 13 ESA than to transfusions. I think that's exactly that point. 14 15 CO-CHAIR CROOKS: Bobbi. 16 MS. WAGER: Dr. Maddux, thank you very much, because you spoke just how I was feeling 17 18 when I read this measure. It scared me because 19 I'm thinking oh, my God, now it's being lowered. 20 There's going to be another target level. Thank 21 you. 22 CO-CHAIR CROOKS: Lisa.

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1	DR. LATTS: The other folks were first.
2	Do you want are you going to okay. Well,
3	I just have a question for the developer. If
4	there's so much because this is not an area
5	that I'm familiar with the science of. So, if
6	there's so much science that shows there isn't a
7	range, what's the developer's interest in
8	creating a below number?
9	DR. PALEVSKY: So, while there is not
10	we agree that ESA therapy should be
11	individualized to the patient to maintain the
12	hemoglobin in a range where the patients feel
13	best. For the majority of patients, that's going
14	to be a hemoglobin greater than 9. And I agree
15	with I remember the patient in the pre-ESA
16	era who were chronically transfused, iron
17	overloaded, developed heart failure from their
18	iron overload from the transfusions they received
19	to maintain hemoglobins of greater than 8.
20	We are not and I tried making it
21	clear, we are not implying that this number sets
22	a range for treatment. This is set below the

level that most individuals would consider where 1 2 you would treat patients with an ESA to maintain the hemoglobin level. I will say that since there 3 has been removal of a target range, we have seen 4 not only a downward trend in hemoglobin levels, 5 but an increase in transfusion rate, which is the 6 7 unintended consequence, I believe, of having eliminated a bottom level for hemoglobins. 8 9 CO-CHAIR CROOKS: Paul, I'm going to 10 need to cut you off pretty soon. DR. PALEVSKY: I understand the concern 11 over this possibly being a stimulus to 12 13 transfusion, but I suspect that it would not actually increase transfusion rates. Right now 14 15 we're seeing the absence of a measure resulting 16 in an increase in transfusion rates. 17 CO-CHAIR CROOKS: Okay, thank you. 18 Stuart. 19 DR. GREENSTEIN: As a transplant 20 surgeon, I would have to just chime in that my biggest concern when you put a number is that you 21 22 will increase the transfusion rate, and it'll

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make it much more difficult for me to ever 1 2 transplant people. Especially, when I look at a patient, I will individualize what kind of 3 hemoglobin they have in terms of when I can go a 4 transplant on them. So, if I have a patient who's 5 in his 30s and his hemoglobin is 8, you know, 6 7 8.5, I don't have a problem doing it, but if he's 55-60 years old, cardiac disease, I would have a 8 9 big problem doing it. I mean, so I don't think 10 you can give an absolute number. You have to individualize, otherwise you're going to 11 12 sensitize everybody, and we're going to have a 13 lot more people waiting, and waiting, and waiting 14 for transplant. 15 CO-CHAIR CROOKS: Okay, thanks. Lori. 16 MS. HARTWELL: I just have a quick question, because I know in the previous years 17 18 that I wasn't, there was a hemoglobin of 10 or 19 below that was rejected. And I'm just having a 20 little bit of difficulty understanding, because hemoglobins aren't being individualized to 21 22 patients. Patients are way too low. I hear it

every day, and it --- you know, I mean, it's kind 1 2 of unconflicted because I understand like you don't want to put a number on it. But then how do 3 you make a safety issue so patients don't get too 4 low? And they are too low in the community. So, I 5 mean, I'm not an expert on it, but it would be 6 7 nice if there was some kind of direction, maybe not from this body, the community that --- to not 8 9 let people drop so low. 10 And just a comment to Alan, when I 11 hear somebody being at an 8 or 8.5, I can only imagine that this patient is elderly and not 12 13 moving around that much, because anybody who's younger can't really --- I can't --- I know many 14

of my friends cannot move with a --- are just not very active at that low of hemoglobin. That's just my only comment.

18 CO-CHAIR CROOKS: Just to back up Alan,
19 there is a lot of variability. There are patients
20 who are quite comfortable, but many who are not.
21 Lorien, I think you're next.

DR. DALRYMPLE: So, I was trying to

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recall our discussion from a years ago, and I 1 2 think the way at least I perceive this measure is it's a safety measure. There have been a lot of 3 incentives put in place to insure hemoglobins 4 don't go high, but we have not --- we no longer 5 have lower boundaries for hemoglobin. And I think 6 7 less than 10 is challenging in adult population because there's black box warnings, FDA, all of 8 9 us who care for advanced CKD patients often have 10 patients with hemoglobins of 9.2.

11 And if you believe the trials, that's probably acceptable, so I think, in part, my 12 13 interpretation is the RPA responded to our last discussion of this measure saying okay, you're 14 15 not comfortable with less than 10. Let's go to 16 the guidelines and still try and develop a safety measure, which is really how I perceive this. 17 18 I don't know if it could incentivize

19 transfusion. That's not how I perceive it. I 20 perceive as perhaps adjusting EPO protocols and 21 other things to insure we don't have a lot of 22 these aids, and, hopefully, we individualize

therapy, and if people feel comfortable at a hemoglobin of 8, we leave them alone and don't give them excessive ESA.

But the RPA did submit supplemental 4 material with the KDIGO guideline from 2012 that 5 Paul mentioned with a grade of 2B. And I 6 7 understand that's not a wonderful grade, but at least we do have a guideline grade now, which I 8 9 think is more than we had a few years ago. So, 10 from my perspective this is a safety measure to 11 try and put a floor in, again. And it's not a target. I think it's like KT over Vs of 1.7. It's 12 13 a floor, not a goal.

CO-CHAIR CROOKS: Okay. Back to Alan. 14 15 DR. KLIGER: Okay. Maybe the developers 16 can help me with this. I see no evidence that as the hemoglobins have, indeed, come down as they 17 18 have recently, I've seen no evidence of the 19 community negative effects that you've described. 20 Surely, there are individuals who are under treated, but in the absence of evidence of an ill 21 22 effect by creating a single floor, rather than by

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a showing that we're attending to each
individual's needs, I see the risk as being
greater than the potential benefit of setting up
an arbitrary floor.
CO-CHAIR CROOKS: Okay. Any other
DR. PALEVSKY: Do you want me to
respond to Alan's
CO-CHAIR CROOKS: If you can do it in
30 seconds or less.
DR. PALEVSKY: Alan, the only evidence
that I can point to is the increasing rate of
transfusion that has been reported since we have
removed a floor.
CO-CHAIR CROOKS: Okay, thanks. So, I
think the
DR. PALEVSKY: There's been almost a 50
percent increase in transfusion rate.
CO-CHAIR CROOKS: Correct. Okay. So,
are we ready to vote on the evidence supporting
this measure? Okay.
MS. OGUNGBEMI: The Committee is now
voting for Measure 1660 evidence. Options are 1

high, 2 moderate, 3 low, and 4 insufficient. 1 2 Voting is open. The results are one vote high, nine votes moderate, six votes low, seven votes 3 insufficient. Measure 1660 is in the gray zone 4 for evidence. 5 CO-CHAIR CROOKS: Moving forward then, 6 7 the gap. DR. KLEINPETER: All right. So, for the 8 9 performance gap, they have 38 percent of patients 10 did not receive the target hemoglobin supported 11 measure for a national performance goal. I 12 already mentioned that there are some disparities 13 regarding age and race, as well as gender, but there was insufficient data available for 14 15 comparisons. 16 And in terms of disparities, some of those are that there are higher rates of anemia 17 18 in African Americans. Why this exists may be 19 multifactoral, but there still is a disparity in 20 that number. CO-CHAIR CROOKS: Okay. So, the gap is 21 22 low, 5.4 percent, but we're considering this as a

safety issue. Who else would like to speak about
 the performance gap? Mahesh.
 DR. KRISHNAN: Maybe just to give you
 some more contemporary data, I'm just looking at

5 our data from March, and it's similar. It hasn't 6 changed a lot since 2012 to now, so it's still 7 about 5 percent, 6 percent. I mean, that's just 8 the variance that there is.

CO-CHAIR CROOKS: Lisa.

DR. LATTS: And we do we know that 5 or 6 percent, based on the expert opinion of the people here, I mean, are those probably people that shouldn't be above 9, or are those people that probably should be there?

15 DR. KLEINPETER: So, at least in 16 looking at our cohort and our population from both LSU and Tulane, a lot of those are the new 17 18 patients that are presenting de novo to the ED 19 who have had been in no care, and some of our 20 sickle patients have sickle cell disease where our target overall is lower, so that we are 21 22 keeping them a lower hemoglobin.

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1	CO-CHAIR CROOKS: I believe the
2	denominator exclusion includes I've looked at
3	so many measures, but I think it excludes sickle
4	cell anemia and other chronic anemia.
5	DR. PALEVSKY: It does.
6	DR. FISCHER: Just so I know what I'm
7	voting on, so the performance gap that was
8	characterized, does that exclude all the
9	exceptions they have, sickle cell, cancer? What
10	we just quoted, the 5 percent is not including
11	any of those individuals?
12	CO-CHAIR CROOKS: I expect that's the
13	case. Would you like to ask the developer? The
14	quote, that's the measure. Alan. Put your card
15	down, Alan. Okay. Josh first.
16	DR. ZARITSKY: So, when I read what
17	they've provided in 1b.2, right, they say, you
18	know, the gap here is 5.4 percent who had less
19	than, you know, hemoglobin less than 9. I'm just
20	you know, then they go on to say 36.5 percent
21	of patients reported did not receive the optimal
22	care. I guess that's referring to those not

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1	within 11 to 12. Right? So, that's not I
2	don't know why that's included in the gap.
3	CO-CHAIR CROOKS: Ishir.
4	DR. BHAN: So, just a question for
5	Mahesh. You said you got a similar number, but
6	you were not excluding people with chronic
7	anemias and such, so that's all comers. So,
8	presumably some of those people do have some
9	other cause of anemia, and it's not really clear
10	to me that this states that those are being
11	excluded here, as well. So, I mean, ideally they
12	should be, if that's what it's you know, if
13	it's part of this document, but it's not clear to
14	me that
15	DR. KRISHNAN: I can get into the
16	specifications but I don't know how we can't
17	exclude those patients either in our own data,
18	because we don't have enough granular data to
19	exclude them off those things, so I don't know
20	you would do that, in practicality, for the other
21	measure.
22	DR. BHAN: So, it may be as great as

5.4 or whatever the number is percent, but it may be lower than that, as well.

CO-CHAIR CROOKS: I think even 3 including the exclusions, 5.4 percent is the 4 noise of new patients coming in and patients, you 5 know --- I conclude the gap is essentially zero, 6 7 and it's kind of a quandary because you may believe it's a safety net, and it's an important 8 9 safety net, but yet you have to vote on the gap. And the gap is not there, so it's a little bit of 10 11 a conflict for me. So, with that in --- okay, Lisa, would you like to shed light on our 12 13 dilemma?

DR. LATTS: No, no, not at all. It's just --- and Poonam and Sarah are gone, but it does almost beg the issue of some feedback to NQF, that for those measures that are safety measures it suggests a different criteria would be most appropriate than a gap for a performance measure.

21 CO-CHAIR CROOKS: So, let's vote on it, 22 and then we can let them, you know, inform us if

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we need to do something different. Mahesh. 1 2 DR. KRISHNAN: Just, you know, I'm looking now at the DOPPS National Sample Data, 3 right, so the gap was as high as, in August of 4 2010, of 9 percent of 9s. Now it's about, sorry, 5 3 percent. Now it's as high as 5 or 6 percent, 6 7 the gap has widened. Yes, widened over the implementation of the black box, which I think 8 9 drove of this not bundled, but we won't go into 10 that. But I think that that gap has widened, 11 clearly, from 3 to 6 percent of the country. CO-CHAIR CROOKS: You think the gap is 12 13 increasing? 14 DR. KRISHNAN: Correct. In August of 15 2010, the sub-9 was 3 percent, and now it's 5 16 percent. CO-CHAIR CROOKS: Okay. Are we ready to 17 18 vote? MS. OGUNGBEMI: The Committee is now 19 20 voting on performance gap for Measure 1660. Options are 1 high, 2 moderate, 3 low, and 4 21 22 insufficient. Voting is open. The results are

zero votes high, five votes moderate, 16 votes
 low, and two votes insufficient. Measure 1660
 fails on performance gap.

CO-CHAIR CROOKS: The pause that 4 refreshes. So, we have voted that the performance 5 gap is too low, even though this is really being 6 7 considered as a safety measure. We're concerned that NQF maybe should have different criteria for 8 9 evaluating a safety net measure, versus another 10 kind of measure, or maybe not. Sarah or Poonam, 11 can you ---

12 MS. BAL: In response to that, we do 13 a panel selected that will be meeting in have the next couple of months. Helen mentioned it 14 15 earlier, that will be working on if we need to 16 change our criteria based on the type of measure, and possibly what the future use of it would be. 17 18 But at the current time, the criteria stands, and 19 it should be treated as if it was any other 20 measure.

21 CO-CHAIR CROOKS: So, we can go on with 22 our considerations. Although it's new, you know,

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we --- it's in that borderline, maybe it's a 1 2 reserve measure, maybe not. MS. BAL: They would need --- have you 3 guys discussed if you want to make it a reserve 4 5 measure? CO-CHAIR CROOKS: We haven't yet. 6 7 (Simultaneous speaking) CO-CHAIR CROOKS: Yes, so we're in the 8 9 gray zone, again, the double gray zone I'd call 10 this. 11 MS. BAL: And before we move forward, Sarah and I disappeared for a little bit, mainly 12 13 because we need to come up with a plan to get through all the measures. We are very far behind 14 15 where we need to be. We really encourage you not 16 to repeat anything what's already been said. Please just make any notes, you know, quickly. 17 18 And, also, going through the measures, if you 19 feel that reliability is good, no need to explain 20 why. Just say that you think the 21 22 reliability is good, and we'll move forward. If

you ---obviously, if there are concerns, you 1 2 should bring those up, but if the --- if you feel that the criteria is met and there's no further 3 discussion needed, just state that and we'll move 4 forward. You know, try to go as quickly as 5 possible. We want to give the measures the due 6 7 review, but we are very far behind at this point. CO-CHAIR CROOKS: Yes, I'd point out 8 9 that's not the Committee's fault that we're 10 behind. I think we're doing a --- you know, I think --- I congratulate the Committee for doing 11 its best job to fairly consider these measures. 12 13 But with all that in mind, let's move on. So, we're now going to get --- so, do we move to the 14 15 new measure then, or do we ---16 MS. BAL: We go back to ---17 CO-CHAIR CROOKS: Are we going to ask 18 for --- we can't get reserve status if it's not -19 20 (Off microphone comment) CO-CHAIR CROOKS: Okay. So, while 21 22 that's all being considered, we're going to move

on to the next measure then. Why don't you take a 1 2 measure, which one ---CO-CHAIR ANDERSON: All right. The next 3 measure is 1424, and the developers are Joe and 4 5 Joe. DR. MESSANA: My status has declined so 6 7 much no one will sit with me any longer. (Laughter.) 8 9 DR. MESSANA: So, in the spirit of 10 brevity, I'm not going to make any specific 11 opening comment except for to try to address a question that was raised in the work group. When 12 13 I was reviewing the comments in preparation for this, someone asked -- one of the work group 14 15 participants asked if the --- related to patients 16 missing hemoglobin, this is pediatric patients, and whether these patients --- there was a 17 18 correlation with other missing values from 19 CROWNWeb, so we did a small additional analysis 20 in CROWNWeb data. Looking at the concordance between 21 22 missing for calcium, phosphorous, and hemoglobin

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from the CROWNWeb data, through each of the 1 2 months of 2013, and there's a little bit of variation month to month, but generally there was 3 concordance in that all three of those values, 4 two bone and mineral intermediate outcomes, 5 calcium and phosphorous, and hemoglobin were 6 7 missing from somewhere between 35, and say 45 percent of patients in any given month from 8 9 CROWNWeb in 2013.

There was concordance in that all 10 11 three were present in similarly about 40 percent give or take from month to month. And then the 12 13 remainder, which was somewhere between 10 and 20 percent in any month, there was a mixed pattern, 14 15 a hemoglobin was there, calcium was not, 16 hemoglobin was there, phosphorous was not, 17 calcium and phosphorous were there, but hemoglobin was not. So, hopefully, that answers 18 19 the work group question, and I'll stop there. 20 CO-CHAIR ANDERSON: All right. Bobbi and Myra, who's going first? 21 22 MS. WAGER: I am. Evidence shows that

1	it's a process measure and it's supported by
2	KDOQI, how do you say it, I'm sorry, guidelines
3	of 2006. There was a systematic review, and they
4	rated it 2b.
5	CO-CHAIR ANDERSON: Myra, do you have
6	anything else?
7	DR. KLEINPETER: Nothing else to add.
8	CO-CHAIR ANDERSON: Committee
9	discussion? Josh.
10	DR. ZARITSKY: I'm going to include
11	some other you know, in 1a.8(2), there's some
12	additional evidence presented also. There's some
13	additional evidence presented also in 1.8(2) that
14	I think we've brought up before in a previous
15	measure.
16	CO-CHAIR ANDERSON: Any further
17	discussion? Let's call for the vote on evidence.
18	MS. OGUNGBEMI: The Committee is now
19	voting on evidence for Measure 1424. The options
20	are 1 high, 2 moderate, 3 low, and 4
21	insufficient. The voting is open. The results are
22	three votes high, 19 votes moderate, one vote

low, and zero votes insufficient. Measure 1224
 passes on evidence.

3 CO-CHAIR ANDERSON: All right. Moving 4 on to the performance gap.

MS. WAGER: On performance gap, based 5 on 2013 CROWNWeb clinical data from January 2013 6 7 to December 2013, there's a quartile range of 22 percent, the mean and medium performance scores 8 9 were 75 and 85 percent, with an inter-quartile 10 range of 22 percent. Again, there's a gap due to 11 the sample size used for the performance scores were considered too small to display useful 12 13 disparities. 14 CO-CHAIR ANDERSON: Myra. 15 DR. KLEINPETER: Nothing else to add. 16 CO-CHAIR ANDERSON: Discussion on the part of the Committee? Call for a vote on 17 18 performance gap. 19 MS. OGUNGBEMI: The Committee is now 20 voting on performance gap, Measure 1424. Options are 1 high, 2 moderate, 3 low, and 4 21

insufficient. Voting is open. The results are two

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votes high, 18 votes moderate, one vote low, and 1 2 zero votes insufficient. Measure 1424 passes on 3 performance gap. CO-CHAIR ANDERSON: All right. 4 Reliability testing. 5 MS. WAGER: Reliability testing 6 7 demonstrates that the measured data elements are repeatable, on the measures collectively of 8 9 CROWNWeb and the specifications described data element identification criteria, clearly. The 10 11 measure is not risk-adjusted. 12 CO-CHAIR ANDERSON: Myra. 13 DR. KLEINPETER: Nothing else to add. CO-CHAIR ANDERSON: Further discussion 14 15 on the part of the Committee? Lorien. 16 DR. DALRYMPLE: Can I just ask one quick question. So, if children are hospitalized 17 18 they're not excluded. Is that correct? And the 19 only reason I bring that up is the N is so small 20 in the pediatric practices, so the unit would be perceived not to have measured a hemoglobin if, 21 22 in fact, it was because the child was

hospitalized. And maybe those hemoglobins get put in and counted.

3 DR. KLEINPETER: So, it all depends on 4 when the unit measured the lab value. If they 5 were hospitalized and did not receive the minimum 6 number of treatments for that month, it would not 7 be included, otherwise, it is included.

B DR. KRISHNAN: It's not put in, though. So, there was a point in time over 2013 where patients were --- we were instructed to auto discharge patients, so if patients were in the hospital for a prolonged period of time in CROWNWeb, we were instructed to auto discharge them so that they didn't come up with errors.

15 So, the probability that that happened 16 is there, and then on top of that --- I won't tell you specifically that labs are consistently 17 18 reentered, right, because there's now a monthly 19 close for CROWNWeb, so we have to get the data 20 back in a certain period of time, then put it in before it's closed. So, there's a lot of 21 22 ambiguity there.

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-	And this is just my concern is
2	this metric I know we've talked about
3	CROWNWeb data transmission issues. This metric
4	will emphasize those data transmission issues.
5	Maybe that's what it is, it's measuring it's
6	assuming that the data reflects reality and that
7	the lab wasn't drawn, not that the lab was drawn
8	and not transmitted, if that makes sense.
9	CO-CHAIR ANDERSON: Michael.
10	DR. SOMERS: I think at least for the
11	children who are dialyzed in pediatric dialysis
12	facilities, since the vast majority of them are
13	associated with the center or actually physically
14	in the center where they'd be hospitalized, I
15	think you wouldn't lose those hemoglobin values.
16	I can't comment on facilities outside of that.
17	DR. MESSANA: So, this CROWNWeb-based
18	data, it's based on patient being admitted to the
	facility for a month, and Mahesh's statement
19	
19 20	regarding discharge for prolonged
	regarding discharge for prolonged hospitalized,

that, they were discharged from the facility. 2 Right? But short of that, they would be considered in the facility if they were 3 hospitalized for 25 days. There might be a 4 missing related to prolonged hospitalization and 5 missed monthly blood draws. 6

7 Regarding the data transmission issue that Dr. Krishnan brings up, so whatever effect 8 9 that has, dependent upon --- differing from 10 organization to organization, when you compare adult CROWNWeb months with a hemoglobin value to 11 the pediatric, there is a significant difference. 12 13 The adults are much higher, so there's something well beyond this data transmission issue that 14 15 Mahesh brings up. The gap is larger for the 16 pediatric patients than it is for the adult 17 patients.

18 DR. DALRYMPLE: But couldn't that be 19 because in pediatrics just one patient will make 20 your number look quite different. If you have an N of 12 in your unit, one or two children can 21 22 drastically change your statistics. And adults,

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you know, we have 100 patients, so ---1 2 DR. MESSANA: I'm talking patient-level analysis, the total ---3 DR. DALRYMPLE: The number of 4 hemoglobins available, though. Is that correct? 5 DR. MESSANA: Yes. 6 7 DR. DALRYMPLE: So, a facility's percentage could quickly drop with just one child 8 9 missing. DR. MESSANA: It could --10 11 DR. DALRYMPLE: Is that correct? 12 DR. MESSANA: -- but the statement 13 that I'm making about a gap is a patient level analysis, national patient level analysis. There 14 15 is something greater --- there's a greater 16 shortfall of patient months with a hemoglobin in the pediatric population, not in the population 17 18 of pediatric facilities. 19 CO-CHAIR CROOKS: Just one comment. 20 This, unlike other pediatric measures, this does not exclude facilities with less than 11 21 22 patients. Right? This is all pediatric patients

1	which is, I guess, in its favor compared to some
2	of the other ones.
3	DR. KLEINPETER: It still states that
4	includes those that had 11
5	CO-CHAIR CROOKS: 11 or more?
6	DR. KLEINPETER: 11 or more.
7	CO-CHAIR CROOKS: Oh.
8	DR. KLEINPETER: It's only 59 of the
9	facilities had 11 people to report.
10	CO-CHAIR CROOKS: So, why would you
11	need that, for just knowing that it was measured?
12	DR. MESSANA: Consistency sake in terms
13	of small cells. We performed the analyses that
14	way to be so that the information was
15	consistent for you to consider.
16	CO-CHAIR ANDERSON: All right. Are we
17	ready to vote for specifications and reliability?
18	MS. OGUNGBEMI: The Committee is now
19	voting on reliability for Measure 1424. The
20	options are 1 high, 2 moderate, 3 low, and 4
21	insufficient. Voting is open. The results are
22	zero votes high, 22 votes moderate, one vote low,

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1	and zero votes insufficient. Measure 1424 passes
2	on reliability.
3	MS. WAGER: On feasibility, our data
4	source for measure is CROWNWeb and
5	MS. BAL: Hold on.
6	MS. WAGER: I'm sorry.
7	MS. BAL: We're on validity.
8	MS. WAGER: I apologize. Again, data
9	from CROWNWeb from January 2013 to December 2013,
10	calculate facility level monthly and annual
11	performance scores. Again, as Myra stated, it was
12	59 facilities and at least 11 eligible patients.
13	And that included 1,280 patients in total during
14	the testing.
15	Spearman correlation to assess the
16	association between the annual performance scores
17	and the NQF endorses standard mortality ratio
18	using the 2013 SMR. Measure is maintained on the
19	basis of face validity, the measure of hemoglobin
20	as a dialysis quality measure was initially
21	developed and approved by clinical TEP, which
22	agreed that this is a quality measure.

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CO-CHAIR ANDERSON: Myra.
CO-CHAIR ANDERSON: Myla.
DR. KLEINPETER: They also reported
that the Spearman correlation coefficient was -
.20 to P value .13, so those patients that had a
higher percent of pediatric patients, the
measures associated with a lower risk of
mortality relative to those facilities with a
lower percentage of pediatric patients where
there's hemoglobin values measured. But it was
not statistically significant.
CO-CHAIR ANDERSON: Any further
discussion? All right. We're ready to vote on
validity.
MS. OGUNGBEMI: The Committee is now
voting on validity for Measure 1424. The options
are 1 high, 2 moderate, 3 low, and 4
insufficient. Voting is open. The results are
zero votes high, 22 votes moderate, one vote low,
and zero votes insufficient. Measure 1424 passes
on validity.
CO-CHAIR ANDERSON: All right, Bobbi,
now you get feasibility.

1	MS. WAGER: Again, our data source for
2	measure is CROWNWeb, the data is collected and
3	generated and use by health care professional
4	during the provision of care.
5	DR. KLEINPETER: Nothing else to add.
6	CO-CHAIR ANDERSON: Any further
7	discussion by the Committee? All right, ready to
8	vote on feasibility.
9	MS. OGUNGBEMI: The Committee is now
10	voting on feasibility for Measure 1424. The
11	options are 1 high, 2 moderate, 3 low, and 4
12	insufficient. Voting is open. The results are 14
13	votes high, seven votes moderate, one vote low,
14	and zero votes insufficient. Measure 1424 passes
15	on feasibility.
16	CO-CHAIR ANDERSON: Moving on, use and
17	usability.
18	MS. WAGER: On usability, the
19	information we got, it stated the measure is not
20	currently in use, but is available for public
21	use. On our conference call, I believe that
22	someone had stated that Network 13 is collecting

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1	data.
2	DR. KLEINPETER: So, nothing else other
3	than we look at it among our pediatric population
4	because it was a special project in our network.
5	CO-CHAIR ANDERSON: Any further
6	discussion?
7	CO-CHAIR CROOKS: Are there I'd
8	like to ask the developers, are there plans for
9	using this in the future?
10	DR. MESSANA: I'm not aware of plans,
11	but I'm also not aware of a lot of things that go
12	on 7500 Security Boulevard, so
13	(Laughter.)
14	CO-CHAIR CROOKS: Well, let me ask the
15	Committee Members, in the submission did they
16	make a case for future use, public reporting or
17	accountability? I don't think that they did. I
18	have it here.
19	CO-CHAIR ANDERSON: John.
20	DR. WAGNER: I was just curious, since
21	we have this high percentage of patients who are
22	not entering who are not being tested for

either calcium, phosphorous, and hemoglobin, are 1 2 there -- will there be unintended consequences? Is the reason that those tests are not being done 3 that it is difficult for the patients to present 4 for blood draws and-or difficulty in 5 venipuncture? Do we understand anything about 6 7 that? CO-CHAIR ANDERSON: Any comments? 8 9 DR. KLEINPETER: So, just the only 10 comment, that they're on hemodialysis, we get it 11 as part of their regular monthly blood draw. The 12 issue is that they're in the hospital, or if 13 they're on home hemo and the parent or care giver forgets to collect it. Those are our missing 14 15 values for our --- among our pediatric patients. 16 CO-CHAIR CROOKS: I just have to say 17 that I'm puzzled by why you would want to go 18 through the trouble of having a measure endorsed, 19 and then there's no planned use for the measure. 20 I'm a little puzzled what the reason for that is. DR. MESSANA: So, I think the question 21 22 is well taken. There have been a couple of things

that we've been assessing at CMS. The first is, 1 2 you know, I think you've seen some of the consequences of just how to address assessing the 3 pediatric population with measures, the minimum 4 case size presents some issues any time you have 5 a measure that is specific to the pediatric 6 7 population, so there's that, and considering how best to use the measure. 8

9 I think the other concern is --- or 10 not concern but issue is that there's an 11 increasing focus on measures that assess 12 performance of care as opposed to reporting of 13 data. I think the distinction here, which causes 14 some conversations internally to CMS, that are 15 still kind of being hashed out.

In terms of the measure itself, my position on that would be that, you know, where there is a --- no clear gap --- where there is a gap in terms of data being available for a process measure like this, or for data being collected, I think it makes sense to have the measure available. It has been used for --- by

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different --- by the networks and is available 1 2 for use by other bodies, as well, regardless of its implementation by CMS. And I think that its 3 availability for that use certainly continues to 4 make sense. 5 CO-CHAIR ANDERSON: Mahesh. 6 7 CO-CHAIR CROOKS: You've got carditis, too. 8 9 CO-CHAIR ANDERSON: All right. I think 10 we're ready to call for the vote on usability and 11 use. MS. OGUNGBEMI: The Committee is now 12 13 voting on usability and use for Measure 1424. The options are 1 high, 2 moderate, 3 low, and 4 14 15 insufficient. Voting is open. The results are two 16 votes high, 17 votes moderate, one vote low, and three votes insufficient. Measure 1424 passes on 17 18 usability and use. 19 CO-CHAIR ANDERSON: All right. Is there 20 any further discussion before we vote on recommendations for endorsement and the overall 21 22 suitability for recommendations for endorsement?

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All right, let's call for the vote. 1 2 MS. OGUNGBEMI: The Committee is now voting on overall suitability for endorsement for 3 Measure 1424. Options are 1 yes/2 no. Voting is 4 open. The results are 22 votes yes, one vote no. 5 the measure passes meeting NQF criterias for 6 7 endorsement. CO-CHAIR ANDERSON: Moving on ---8 9 CO-CHAIR CROOKS: Keep going. 10 Obviously, you're better than I am. You're moving 11 things --- obviously, you're the better facilitator for this, so please go ahead with 16 12 13 CO-CHAIR ANDERSON: No, 2699, and it's 14 Joe. Are you by yourself again? 15 16 DR. MESSANA: No. Dr. Doug Schaubel flew in today. He's the biostatistician who is 17 18 the lead statistician on the transfusion metric, 19 so he joined me in case there are any technical 20 questions. I would like to take the two to three minutes allotted to developers for this measure, 21 22 because I think I have a bit of perspective and

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history that may help answer some of the questions that were raised during the work group. And I prepared a written statement.

The transfusion ratio measure is a 4 direct product of the 2012 anemia TEP that I 5 facilitated. TEP members included Jeff Berns, who 6 7 is the Chair, Klemen Meyers, John Stivelman, the late Kathe LeBeau, Diana Hlebovy, I always 8 9 mispronounce her name, I apologize again to her. 10 Sheila Doss-McQuitty, Dr. Robert Kane, and Dr. 11 Harvey Luxemburg both from the Food and Drug Administration. They were non-voting participants 12 13 of the TEP. There was a pediatrician who was supposed to participate but couldn't because of a 14 15 family emergency.

16 So, the context for the 2012 TEP, as 17 most of you know, included emerging safety 18 concerns about the use of aggressive hemoglobin 19 targets and high doses of ESA at approximately 20 the same time that a fundamental revision to the 21 Medicare ESRD PPS bundle was made that shifted 22 financial incentives and clinical incentives from

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more use of ESA to less use of ESA. The TEP's concern was largely in protecting patients from both overuse and under-use of ESAs, and I think some of that discussion from the RPA measure discussed a few minutes ago kind of reflects some of those concerns.

7 Also, the 2011 revised FDA package insert for EPO, which included a statement about 8 9 transfusion avoidance being one of the major 10 goals of EPO therapy in this population was 11 reviewed by the TEP. The deliberations. First, the TEP reaffirmed the dialysis facility central 12 13 role in anemia management. They recommended three measures, hemoglobin less than 10, hemoglobin 14 15 greater than 12, and a risk-adjusted transfusion 16 measure.

17 Regarding the relationship between 18 anemia management and transfusion, the TEP was 19 impressed by the impact the introduction of ESAs 20 and the evolution of anemia management practices 21 have had on transfusion rates in dialysis 22 patients from the initial reports of Eschbach and

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Neil Powe over two decades ago, the secondary 1 2 outcome from some of the larger clinical trials, the Canadian and European trial, in particular. 3 They used the paradigm that the 4 decision to transfuse a patient is based on 5 clinical judgment, but that that clinical 6 7 judgment depended on both the patient's achieved hemoglobin and the clinical context, be it 8 9 planned surgery, unplanned surgery, GI bleeding, 10 et cetera. They felt that the clinical context 11 was often not under the dialysis facility's control, but the hemoglobin concentration often 12 13 was. A major area of discussion related to 14 15 which comorbidities and events should comprise 16 the exclusion list. The TEP recommendations for exclusions were followed in development of this 17 18 measure. They settled on an exclusion list that 19 reflected conditions that were very likely to 20 result in decreased ESA responsiveness, and were also conditions that may well reflect either 21

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strong relative or absolute contraindications to

ESA use in many cases.

2	They explicitly chose not to recommend
3	inclusion of other diagnoses, such as GI
4	bleeding, and other conditions to the list.
5	Regarding the identification of transfusion
6	events in Medicare claims which has come up in a
7	work group discussion and public comments, the
8	TEP should not be held responsible.
9	That was an implementation issue, and
10	we developed the methodology, based on American
11	Red Cross transfusion billing guidelines
12	published within the last several years. This
13	technique has been used extensively by Dr.
14	Collins and colleagues to publish several
15	research papers in peer reviewed clinical
16	journals over the last five years, and to support
17	Dr. Collins' presentations at national meetings
18	on the topic of increasing transfusion rates
19	subsequent to 2011.
20	The methodology's validation has been
21	limited to one article that I could find from
22	2000 or 2001 from Dr. Powe's group describing the

high specificity and moderate sensitivity of identifying transfusions through these claims when compared to electronic medical record system review in a single large referral medical center. I'll stop there.

CO-CHAIR ANDERSON: Thanks. And the discussants are Dodie and John. John.

DR. WAGNER: Thank you. I will lead 8 9 off. So, we have the standardized transfusion 10 ratio, and the numerator statement is the number of eligible observed red blood cell transfusion 11 12 events, and they are defined, as we've just heard 13 from revenue codes, procedures codes. And the denominator is the number of eligible red blood 14 15 cell transfusion events as defined in the 16 numerator statement that would be expected, so there is a statistical modeling of the expected 17 18 events, and a ratio is created around those. 19 The evidence to support this is based

on KDIGO in 2012. There are three guidelines cited, two of them have to do with reducing blood transfusions as a goal with 1b evidence, and one

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of them has to do with managing chronic anemia without excessive risk of ESAs, and, therefore, in such instances where there's a concern, red cell transfusions may be preferred. And that evidence is rated 2c.

There were also 17 articles reviewed 6 7 by the TEP, and many of those have to do with issues related to the reduction in transplant 8 9 suitability resulting from aloe sensitization, 10 and hemoglobin target analyses. So, there really is not the risk tradeoff as to what would be the 11 ideal use of ESA versus the risk-benefit ratio of 12 13 transfusing is not cited in any of the literature. So, that is the evidence. As far as 14 15 the performance gap goes, there is a listing ---16 CO-CHAIR ANDERSON: John, I think we'll 17 just ---18 CO-CHAIR CROOKS: Yes, hold on a 19 minute. 20 CO-CHAIR ANDERSON: Yes, we'll just do the evidence for right now. 21 22 DR. WAGNER: Okay.

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1	CO-CHAIR ANDERSON: Dodie.
2	DR. STEIN: There was one statement
3	about there are no empiric data per se, but
4	transfusions are considered suboptimal care,
5	therefore, the adverse outcomes and things.
6	CO-CHAIR CROOKS: Okay. So, this
7	measure is claimed to be an outcome measure and,
8	in fact, this is an outcome measure. I think it's
9	the only one that's been presented to us that
10	really is an outcome measure in the sense that
11	it's they didn't claim it to be an
12	intermediate outcome.
13	So, the burden of evidence is
14	different in an outcome measure, and it's not to
15	show link it to mortality or other outcomes,
16	but it's to show that it can be changed by
17	something up stream, a process, an intervention.
18	And I don't think they approached it that way, so
19	it left me a little confused. So, I'd like to ask
20	developers what you were thinking about, or am I
21	misreading your application?
22	DR. MESSANA: Well, maybe we weren't as

explicit as we should have been. There were ---1 2 the TEP was presented with information about achieved hemoglobin and subsequent transfusion 3 risk in the subsequent quarter after an average 4 hemoglobin in the preceding quarter, which showed 5 an inverse relationship between transfusion 6 7 events and that prior achieved hemoglobin. In addition, since the TEP, and as 8 9 part of the submission, Dr. Collins presented a facility-level publication in 2014 in American 10 Journal of Kidney Disease dividing achieved 11 facility-level hemoglobin by guintiles and 12 13 looking at transfusion risk, showing that that achieved hemoglobin was predictive of subsequent 14 15 transfusion rates at the facility. That's the 16 only additional evidence that I would offer to suggest that there is an intermediate outcome 17 18 that is fairly significantly associated with 19 transfusion events.

20 CO-CHAIR CROOKS: So, maybe making the 21 case that how you manage anemia will impact this 22 outcome?

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DR. MESSANA: That was the belief and 1 2 the intent of the TEP when they recommended this 3 measure. CO-CHAIR CROOKS: Just like mortality 4 5 as an outcome, we know zero mortality isn't achievable. Is there a target transfusion ratio 6 7 that we --- the units should be striving for? Is one the right ratio? 8 9 DR. MESSANA: Well, one is --describes the average, if you will, use of 10 11 transfusions by peer facilities in a riskadjusted rate within that particular year, so 12 13 it's like the standardized mortality ratio, standardized hospitalization ratio, it is a 14 15 relative ranking of transfusion use in that year, 16 adjusted for patient and facility characteristic. 17 CO-CHAIR CROOKS: Right. So, you know, I'm --- I know that mortality, it's better to 18 19 have less, you know. And is there a --- is it 20 best to have no transfusions, or have a zero? I mean, what is the target, if this is an outcome? 21 22 Which way are we trying to move this outcome?

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DR. MESSANA: I think that that's a 1 2 question that's more appropriate for the group, but since you directed it at me, I would suggest 3 that lower rates would, generally, be better. 4 There may be some exceptions, particularly in 5 patients that are not good candidates for ESA 6 7 use, and I think for the most part those are addressed by the exclusions. About 20 percent of 8 9 patients are covered by exclusions in any given 10 year, 19-20 percent, something like that. 11 CO-CHAIR CROOKS: To help you do your work, I do think this is an important outcome. 12 13 It's an important measure, and I think the case that you should have probably made to us is this 14 15 outcome, standardized transfusion ratio is 16 related to how you manage anemia, processes up stream do affect it, and to make that link for us 17 18 in a very clear way. Then I think the discussion 19 on evidence is over. It's not --- it doesn't have 20 to link to other outcomes. So, I'll stop beating that horse, and open it up to the floor for 21 22 discussion of the evidence.

1	CO-CHAIR ANDERSON: Alan.
2	DR. KLIGER: Just very quickly, it's
3	hard for me to imagine this as an outcome
4	measure. It's either an intermediate outcome, or
5	a process measure. We're not seeking to have a
6	ratio. I mean, that's not an outcome.
7	Furthermore, the standardized
8	measures, Peter, as you pointed out, we have to
9	be very careful about understanding what those
10	mean. A standardized hospitalization or mortality
11	ratio, the direction of that, and the goal of
12	that looks fairly clear. But if you talk about
13	things like a standardized infection ratio, for
14	example, we'll be talking about that later,
15	achieving the same level that everybody else in
16	the country achieves, gosh, I don't want to be
17	judged if my medical center, that we're so good
18	with infections that we're just as bad as
19	everybody else.
20	The standardized infection ratio
21	doesn't make a whole lot of sense to me. A
22	standardized transfusion ratio is only useful, as

you point out, to understand what direction 1 2 you're going in, and why. I'm not certain that zero transfusions are right. I'm also not certain 3 that high transfusions are wrong. I don't know. 4 So, I think this is sort of a process measure, 5 and I think we should judge it according to the 6 7 standard route for a process measure. CO-CHAIR ANDERSON: Josh. 8 9 CO-CHAIR CROOKS: Well, they did claim 10 11 CO-CHAIR ANDERSON: Oh. 12 CO-CHAIR CROOKS: I'm sorry, just to 13 finish the conversation. 14 CO-CHAIR ANDERSON: Sorry. 15 CO-CHAIR CROOKS: They do claim it's an 16 outcome measure, and even in the evidence section they checked the box outcome measure. And I can 17 see it that way, I can see it as parallel to 18 19 standard hospitalization ratio, mortality ratios, 20 and so on, but that's the case they're trying to make, I think. 21 22 DR. KRISHNAN: I have a question on

that very specific aspect. When we started this 2 conversation, we said that two of the measures, SHR and SMR were moved into the future because 3 they're looking at the --- sorry, because they 4 were moving the SMR and SHR further up, because 5 we're looking at the risk adjustment methodology. 6 7 Is this the same risk adjustment methodology, or different?

9 DR. MESSANA: No. There --- so, the 10 risk adjustment strategy for this metric, in addition to incident comorbidity is 27-28 11 comorbidities which are included in the first 12 13 level, the patient-level metric. The risk adjustment strategy is the exclusion of 14 15 approximately 20 percent of patients with 16 comorbidities from prevalent comorbidity claims that are associated with malignancies, sickle 17 18 cell anemia, other acquired --- excuse me, other 19 hereditary hemoglobinopathies, so in addition to 20 the incident comorbidity adjustments, there are prevalent comorbidity adjustments from Medicare 21 22 claims.

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1	DR. KRISHNAN: So, this is sort of a
2	hybrid between the two?
3	DR. MESSANA: Well, it has additional
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5	DR. KRISHNAN: So, will the
6	deliberations that you have for the SMR and SHR
7	affect this risk adjustment methodology, as well,
8	or should we not think that way?
9	DR. MESSANA: Don't know. The SHR and
10	SMR TEP is charged with addressing those. I
11	suppose that depending upon where that discussion
12	goes, who knows. I can't predict the future, and
13	I don't think you should make any decisions based
14	on that statement.
15	CO-CHAIR ANDERSON: Okay. Josh.
16	DR. ZARITSKY: I have a real problem
17	with this as an outcome measure, and that really
18	affects how you're going to judge the evidence.
19	And going toward the evidence, you know, for the
20	denominator, you know, what's the evidence that
21	that denominator is valid in this I mean,
22	there should be some evidence presented that

there's --- that that denominator has some validity.

I guess I'm asking for evidence that 3 there is --- you know, what is the evidence that 4 this is a valid measure, that there is a 5 standardized expected transfusion ratio in this 6 7 population? I mean, I could stop with number one, the outcome. You know, I want to know is it an 8 9 outcome versus intermediate, and then I'm just having a hard time --- I'd like to see some 10 11 evidence here using this standardized --- maybe I just don't know it because I'm not an adult 12 13 nephrologist, that this standardized transfusion --- expected transfusion has validity --- you 14 15 know, there's evidence for its use in this 16 population. DR. MESSANA: So, Doug, do you want to 17 18 try to comment? I'm not sure I understand the 19 question, but Doug apparently does. 20 DR. SCHAUBEL: I'm not totally sure I understand either, but just a comment pertaining 21 to your question, is that the --- so, every 22

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center is observed, transfusions are compared to 1 2 the expected, and that's the same general procedure as what's used in mortality and 3 hospitalization. And, ideally, perhaps you'd like 4 to be much lower than expected, and perhaps what 5 happens at the national level is not really the 6 7 target because it should be lower in the nation as a whole. But at the end of the day, I'd say as 8 9 a target, it's a way to compare each center in a 10 uniform way. 11 DR. ZARITSKY: How do you --- just tell me since I don't know, how do you calculate the 12 13 expected, then? 14 DR. SCHAUBEL: Yes. So, it's 15 considering the patient characteristics and the 16 national --- there's a baseline rate which is independent of patient characteristics which 17 18 applies to everybody, which applies to every 19 patient across the country. And then that 20 patient's characteristics scale up what the expected is for that patient, either scales it up 21 22 or scales it down, depending on what those

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characteristics are. And then the sum is taken for every patient within that center to come up with that expected count, which is then compared to the observed. That's the same --- in a general sense, that's the same as the SMR and the SHR. CO-CHAIR ANDERSON: Frank. DR. MADDUX: So, I'll ask Joshua's

question a little bit differently, but similarly 8 9 to colleagues on the Committee and others. I don't understand why a standardized ratio is 10 appropriate for this particular measure, because 11 I believe that if we're looking at trying to 12 13 understand both the distribution of transfusions and the rationale for transfusions, I don't 14 15 understand how this particular measure actually 16 gives us complete clarity, other than we know that you can rank them across a distribution 17 18 against an expected range.

And I can tell you without any
transfusion guidelines, unlike there may be in
hospitals for cardiac surgery, I know of no
transfusion guidelines for end stage renal

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disease patients. It's very much a one by one decision, so I'm just struggling with the rationale of creating the standardized ratio and the evidence that supports in another way what an expectation should be.

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CO-CHAIR ANDERSON: Andy.

7 DR. NARVA: Yes. I think, you know, what this reflects is an assessment of management 8 9 of anemia, and we're often looking for ways of 10 improving quality of care while at the same time promoting individualized decisions. And I think 11 that this sort of measure, which really gets at 12 13 avoidance of anemia, avoidance of transfusion really has that built in. And I think the lack of 14 15 a guideline on transfusion isn't necessarily a 16 negative thing. Here I think that this allows --some patients clearly are candidates for 17 18 transfusion, some patients aren't. 19 In general, we try to avoid 20 transfusion and that's --- even the FDA agrees

embodies the opportunity to improve care while

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with that, so I think this sort of is ---

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at the same time promoting sort of individualized 1 2 patient decisions. And I don't know how that fits into the outcome versus process measure, but I 3 think it allows us --- in some ways it may be the 4 best reflection of quality management of anemia. 5 And I also think --- you know, I'm 6 7 sure many people here have been on medical review boards and networks, but these ratios are 8 9 extremely good at identifying outliers, at least 10 for the examination of quality issues. And I 11 think that's an important purpose, presumably, of 12 this measure. 13 CO-CHAIR ANDERSON: Lorien. DR. DALRYMPLE: And I think I have more 14 15 of a procedural clarification question, for 16 perhaps Sarah or the Chairs. So, have we come to agreement on what type of measure this is, as to 17 18 whether it's an outcome or an intermediate 19 clinical outcome? Because I think that would 20 then help the Committee have an active discussion about whether we're grading, or voting yes/no. 21 22 And then when there are these

methodologic issues, especially with standardized 1 2 ratios which are inherently complicated and riskadjusted, should we be conferring some of that 3 discussion to the reliability and specifications 4 where we all argue about the merits of 5 biostatistical techniques to report meaningful 6 7 data, of which there are many choices, or do we need to be discussing that in the evidence? 8

9 MS. SAMPSEL: Okay, so that's two 10 questions. First question, process or outcome? The developers have submitted this as an outcome 11 12 measure. They did attempt to provide a link, 13 which is the NQF requirement between a process of care and an outcome. They are indicating the 14 15 outcome that they are, you know, assessing 16 measurement of as transfusion, so, you know, I think that Dr. Narva said it correctly, that this 17 18 is kind of management of anemia to prevent transfusion as the outcome. Correct me if I'm 19 20 interpreting that incorrectly.

21 DR. MESSANA: I think that reflects our 22 opening statement, and the introductory statement

in the application.

2	MS. SAMPSEL: So, you are you will
3	when you vote on this, you'll evaluate this based
4	on the question, does the rationale that was
5	provided support the relationship of the health
6	outcome of a transfusion to at least one health
7	care structure, process, intervention, or service
8	as provided in the evidence?
9	Your second question regarding two
10	discussions on the methodology, the statistics,
11	that fun conversation I'm sure is going to happen
12	under reliability and validity.
13	CO-CHAIR ANDERSON: Michael.
14	DR. FISCHER: Just going back to what
15	Frank said, and if you look at, again, the
16	algorithm we used, you know, if it is an outcome
17	measure, then really it's pass or no pass. And I
18	think there's no ambiguity when you think of SHR
19	and SMR, in terms of the opinion that higher is
20	worse.
21	But this is a case where I think that
22	there's a lot more ambiguity about higher if

you're higher, if your standardized transfusion 1 2 ratio happens to be higher, is that unambiguous that that reflects a problem with quality of 3 car,, and that there's a process or a structure 4 that needs to be changed to improve quality? And 5 I guess that's why I have --- I distinguish this 6 7 from the aforementioned two ones that I mentioned because, to me, I think there's a lot more 8 9 ambiguity and uncertainty about how it's 10 interpreted, and, hence, what a facility is 11 supposed to do in terms of quality of care. CO-CHAIR ANDERSON: Lisa. 12 13 DR. LATTS: Well, and it's sort of ---Michael, in response to that, I think that it is 14 15 one of those measures that you have to get away -16 - you can't think of it as higher or lower, as better or worse. It's only an observed versus 17 18 expected, and it's very --- that's why it's 19 critical that whoever is doing the measuring then 20 does the expected accurately, and you as a facility, or whoever is submitting it, won't know 21 22 until you get the data crunched whether --- how

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you performed.

2	Because you won't know until you know
3	how your relationship is from observed to
4	expected, because it's not supposed to be low,
5	it's not supposed to be high. It's your
6	relationship of that observed to expected that is
7	the key outcome. And it's a very uncomfortable
8	place to be, because you don't know if you're
9	supposed to be high or low.
10	CO-CHAIR CROOKS: I'd like to suggest
11	a way forward, and that is let's accept the
12	application that this is an outcome measure, and
13	let's vote based on the evidence, based on that
14	they have or you believe there's a linkage to a
15	service, an intervention, health care structure,
16	or process. And let's just vote on it that way,
17	because that's what they're asking us to do. It's
18	not necessary for them to link it to other
19	outcomes. And in my opinion, the case is made, or
20	I'm going to give them that in my own personal
21	opinion. But I think we should just vote on it
22	that way, and then we can move on from there.

Does that make sense?

2	CO-CHAIR ANDERSON: I'd just like to
3	make one other comment, and that's where it's at
4	a facility level, this measure is at a facility
5	level. And dovetailing on what you said, Michael,
6	I'm not sure that's where the right place is. If
7	this shouldn't be at a clinician level versus the
8	dialysis facilities, because many of the
9	facilities aren't doing standardized, or blood
10	transfusions, within their facility. They're
11	sending their patients to the blood bank, or
12	wherever, so I have concerns about it being a
13	facility-level measure.

DR. MESSANA: The reason that this is 14 15 a facility-level measure, and the TEP felt very strongly about this, dialysis facilities are held 16 17 responsible under the CFC 494 regulations for 18 anemia management. Dialysis facilities are paid for anemia management, and are the sole source 19 for administration of ESAs in chronic dialysis 20 patients on Medicare. And the TEP felt very 21 22 strongly that anemia management contributed to

the decision to transfuse because achieved hemoglobin in, you know, different clinical context was a main contributor to a decision to transfuse given the situation, or given the 4 clinical context. That's why they supported this or they recommended this as a dialysis facility 7 level metric.

CO-CHAIR ANDERSON: But I guess I would 8 9 also argue that it's the clinician's decision to transfuse. It's not the facility's level to make 10 11 that decision whether or not to transfuse the 12 patients.

13 DR. MESSANA: I accept that, but the clinician uses --- it's the accepted standard of 14 practice for me to transfuse a patient who has 15 16 some absolute achieved hemoglobin threshold, and the achieved hemoglobin threshold is at least 17 18 partially in most situations under the facility's 19 control and responsibility.

20 There are situations where the achieved hemoglobin that you would choose to ---21 22 that I, as a clinician, would choose to

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transfuse is going to be different than an absolute that Red Cross would set based on active GI bleeding or other conditions. But still the achieved hemoglobin in almost every decision I've ever made to transfuse is a major contributor, a major clinical input, to that decision.

CO-CHAIR CROOKS: Lisa.

DR. LATTS: Just one quick sort of 8 9 comment and, again, from sort of an outsider 10 perspective as I'm looking at this, is that this 11 might be a nice compromise if you can operationalize it, which maybe you can't. If you 12 13 don't know what the hemoglobin targets are, if they should be 8, 9, 10, or something, or none if 14 15 we can't come up with a target, maybe an observed 16 to expected is a better way to measure it.

17 CO-CHAIR ANDERSON: All right. Are we
 18 ready to call for the vote based on evidence?
 19 CO-CHAIR CROOKS: We're linking the
 20 outcome to process, structure, intervention.
 21 MS. OGUNGBEMI: The Committee is now
 22 voting on evidence as an outcome measure. The

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options are 1 yes, 2 no. This is for Measure 1 2 2699. Voting is open. The results are one or 12 votes yes, 10 votes no. The Measure 2699 is a 3 gray zone measure for evidence. 4 CO-CHAIR ANDERSON: So, performance 5 qap. John. 6 7 DR. WAGNER: Okay. So, gee, I was hoping --- oh, well. So, there is based on the 8 9 STRRs reported from 2009 through 2012, a 10 performance gap in comparing, for example, inter-11 quartile range of about 0.6 to 0.7 each year. And there were also analyses of disparities, there 12 13 was some statistically significant changes in transfusion ratios obtained when viewing females, 14 15 Native Americans, Asians, Blacks, other race 16 versus --- and Hispanics, which were not felt to be clinically significant in that when one 17 18 adjusted for those, the STRR seemed to have the 19 same results. 20 CO-CHAIR ANDERSON: Dodie, anything 21 else? Any other comments for the Committee? 22 CO-CHAIR CROOKS: The only other

consideration for performance gap is you sort of 1 2 need a target to say there's a gap, and there's a dispersion of results. And if the idea is that's 3 a gap because everybody should be coming together 4 close to one, okay, but then that suggests that 5 the target is one. So, gap is a little hard to 6 7 interpret. I do agree that there is dispersion of results. 8

CO-CHAIR ANDERSON: Okay. Mahesh.

10 DR. KRISHNAN: I just --- one thing I 11 didn't understand, maybe get the Committee's input. If the standardized, mean standardized 12 13 transfusion rate hasn't really changed, if I read this correctly, all that much from 2009 to 2012, 14 15 you guys just described the mean hemoglobin has 16 gone down, how do we reconcile those two? (Off microphone comment.) 17 18 DR. KRISHNAN: But we're saying it's a 19 surrogate for hemoglobin, but we know that the 20 mean hemoglobin has gone down. If the mean hemoglobin has gone down for the country and this 21

measure hasn't changed, how does that --- that

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doesn't seem to correlate. 1 2 CO-CHAIR ANDERSON: Alan. DR. KLIGER: A transfusion ratio just 3 describes variation around the mean of the 4 country. And it's hard for me to understand what 5 a performance gap means given that kind of a 6 7 measure. I don't see how we can interpret it a performance gap. 8 CO-CHAIR ANDERSON: John. 9 10 DR. WAGNER: Yes. So, I agree that if 11 you don't know what your target is, it's hard to understand how one should view these dispersion 12 13 of values. And the fact that the issues that were thought to provoke a concern around this, namely, 14 15 the change in FDA indications in prescribing 16 information and the impact that the billing reimbursement methodology would have on 17 18 transfusions doesn't seem to be reflected in any 19 real change in the dispersion of these values. 20 But, again, it depends on how one views the value of the STRR as a clinical outcome. 21 22 CO-CHAIR ANDERSON: Josh.

DR. ZARITSKY: If you just use the gap 1 2 to say hey, well it's just --- there's this variation and stop there, and say well, that's 3 your gap. There's a variation, because we don't 4 know what's better or worse, but there's a 5 variation. It's not like we're all at one, so 6 7 there's no point in --- so, there's always going to be a gap. 8 9 (Off microphone comment) 10 CO-CHAIR ANDERSON: Turn your mic on, 11 Alan. 12 DR. KLIGER: But whenever any of these 13 standardized ratios -- by definition, will just describe the variation around the mean, always 14 15 will be there, and I just don't know how to ---16 what a gap means in that context. CO-CHAIR CROOKS: I would suggest as 17 18 sort of a flaw in the way we're supposed to 19 consider these, if it is an outcome measure, then 20 the gap doesn't mean the same thing, and maybe gap shouldn't be part of the consideration for an 21 22 outcome measure. But there we are, we have it

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1	right now. Sarah, would you have anything to
2	MS. SAMPSEL: I don't have anything to
3	add.
4	CO-CHAIR CROOKS: Okay.
5	(Off microphone comment)
6	CO-CHAIR ANDERSON: Very brief, because
7	we're going to have to go to public comment.
8	DR. MESSANA: So, the only issue is
9	that absolute transfusion rates increased after
10	2011. You're looking at risk-adjusted rates here,
11	so in terms of justifying the need or the
12	protection for the population, the absolute
13	transfusion rates may be more important to
14	consider.
15	CO-CHAIR ANDERSON: All right. With no
16	further discussion, let's move to vote on
17	performance gap.
18	MS. OGUNGBEMI: The Committee is now
19	voting on performance gap for Measure 2699. The
20	options are 1 high, 2 moderate, 3 low, and 4
21	insufficient. Voting is open. The results are one
22	vote high, 10 votes moderate, three votes low,

and nine votes insufficient. Measure 2699 falls 1 2 in the gray zone for performance gap. CO-CHAIR ANDERSON: We're going to need 3 to pause on this measure for public comment. 4 OPERATOR: If you'd like to make a 5 comment please press \*1. There are no comments at 6 7 this time. MR. DIAMOND: I would just urge the 8 9 Committee to ask staff to provide the definitions 10 for structural, process, and outcome measures. I was totally confused about the discussion that 11 this last measure is defined as an outcome 12 13 measure. My understanding, and I may be totally incorrect, of an outcome measure is a description 14 15 of a patient's status, and the change in the 16 patient's status. Mortality is an outcome measure. This 17 18 is a process measure. This is something that has 19 been done to a patient. If this becomes an out --20 - if this is defined as an outcome measure, then

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anything we do to a patient and any ratio that we

attach to doing something to patients becomes an

outcome measure. So, I think the way to resolve 1 2 this would just be go back to --- I'm sure there's some standard definitions within the 3 archives of NQF that define something called a 4 structural, process, and outcome measure. 5 CO-CHAIR ANDERSON: Did you introduce 6 7 yourself for the record? MR. DIAMOND: Oh, I'm sorry. For the 8 9 reporter, thanks, Lou Diamond speaking for 10 myself. 11 CO-CHAIR ANDERSON: All right. Let's 12 continue on our measure --- turn your mic on. 13 DR. DALRYMPLE: Would it be possible to maybe take a short break. I think this is 14 15 actually a fairly complicated reliability section 16 to go through, even if it's just for five minutes for the Committee, or is that not a choice? I 17 18 don't perceive this to be a straightforward 19 reliability, in large part because of the 20 statistical methodology, and all of the issues that have come up today. And it's ---21 22 CO-CHAIR ANDERSON: Actually, what we

would like to propose is to go ahead and get up, 1 2 and get lunch, but actually do a working lunch so we can get through more of the measures. So, if 3 you could be back by 12:30, and then we'll do 4 that. Thanks, Lorien. 5 (Whereupon, the above-entitled matter 6 7 went off the record at 12:15 p.m. and resumed at 12:30 p.m.) 8 9 CO-CHAIR ANDERSON: All right. We're 10 back 11 on Measure 2699. And we're at specifications and reliability. Dodie or John? 12 13 DR. WAGNER: Okay, well pardon my chewing. 14 15 So, specifications, the numerator 16 includes claims data and various procedure and revenue codes. I guess the comment I would make 17 18 about that is that it seems there are certain 19 procedure codes that will allow one to capture 20 the number of units transfused versus revenue codes which I think only give a thumbs up or 21 22 thumbs down on a transfusion event.

So, I'm not sure if that affects the 1 2 reliability of the data. There's no information about that. And if I'm confused about that 3 point, if someone can clarify that, I would 4 5 appreciate it. Okay, as far as the denominator 6 7 exclusions, there are the exclusions that are thought to influence anemia management in a way 8 9 that would make it difficult to use ESAs and, 10 therefore, the things that one has seen in other metrics have been put forth as exclusion events. 11 However, I think unlike other anemia 12 13 metrics, the only hemoglobinopathy that is mentioned is sickle cell and there is no other 14 15 exclusion for other hemoglobinopathies and, 16 depending on the coding, I'm not sure if that would then result in some confusion, for example, 17 18 someone had SC disease or something along those 19 lines. 20 In terms of other exclusions that would relate to the KDIGO Guidelines that were 21

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cited, ineffective bone marrow could be the

result of other issues such as inflammation,
 surgical trauma and those events are not
 exclusion events.

As far as the statistical modeling which I think will be a large discussion, this is using a statistical model which is risk-adjusted for age and for nursing home status at time of the ESRD onset and years on ESRD, diabetes status and comorbidities as at the time of filling out the 2728.

And the risk-adjustment does not get updated as one accumulates time on dialysis. And this risk-adjustment is then put into a Cox model to come into the expected transfusion rate ratio. I'm sorry, the expected transfusion rate and then observed over the expected delivers the ratio.

17 So, I think there is, again, a 18 question as to whether one can view an expected 19 rate as indicative of good quality care or 20 consistent with recognized standards of care and 21 whether there should be other risk-adjustments 22 within the model that speak to issues such as

bleeding events, such as surgical events, such as 2 infectious events and those have not been incorporated into the model. 3

And also locus of transfusion since 4 there are some dialysis facilities which have the 5 ability to transfuse and many which do not. It's 6 7 not clear what the relationship of the locus of transfusion might bear on this model. 8

9 So, again, another way of looking at the reliability of the data are to discuss the 10 inter-unit reliability and based on their 11 analysis of the inter-unit reliability, the 12 13 developers indicated they believe there was a moderate degree of reliability. 14

15 So, that is my comments. I think this 16 is very problematic to claim that this is a reliable indicator of quality. 17

18 And, with that, I'll open up the 19 floor. 20 CO-CHAIR ANDERSON: Dodie, any

additional comments? 21

DR. STEIN: The only other comment is

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1	I may mention the larger facilities are going to
2	have a higher IUR.
3	But I just have problems with the
4	whole calculation of all of this and then some
5	feasibility issues for later.
6	CO-CHAIR ANDERSON: Right. Alan?
7	DR. KLIGER: I guess I'm not surprised
8	that there should be a correlation between a
9	standardized transfusion ratio and
10	hospitalization or mortality. Maybe we're just
11	identifying sicker patients. I'm just not sure
12	what that tells us. I don't know that that
13	validates the measure, it just identifies perhaps
14	a group of sicker patients.
15	CO-CHAIR ANDERSON: Lorien?
16	DR. DALRYMPLE: And I think I'm not
17	sure if we're going to discuss this as a
18	committee or further pose it to the
19	I'm not sure if we're going to further
20	discuss this as a committee or move it to the
21	developers in the name of time, but this issue of
22	how transfusions are counted, depending on if

you're a revenue center or a procedure code, it sounds like from this submission, and I do greatly appreciate the transparency on the approach to counting, the procedure codes tend to be a smaller percentage but I don't have an understanding of what percentage.

7 And then this question comes to my mind, well, Facility A is associated with 8 9 Hospital A and Facility B is with Hospital B and 10 Hospital A tends to use revenue centers, so 11 there's going to be less events systematically counted compared to B using procedure codes. 12 13 Is Facility B really just being penalized because they're associated with 14 15 hospitals that use different billing practices 16 and does this happen systematically? Because my understanding is all 17 18 inpatient claims are counted unless you are a 19 transplant hospitalization.

20 So, we're now making the facility 21 accountable, not just for their care of 22 practices, but the care of practices at the local

hospital may have very different transfusion 1 2 standards than we have and may also have systematically different billing practices. 3 So, I don't know if we, as a group, 4 should discuss all these issues or, in the name 5 of time, ask for clarity? Peter? Connie? 6 7 DR. MESSANA: Well, so, Lorien, I'm not sure I can provide a lot of clarity on the latter 8 9 question. It is certainly, as I pointed out in my introductory statement, this approach is the 10 best one can do with the claims basis. 11 But there certainly is opportunity for 12 13 a hospital to hospital variation in how they, you know, how they submit those and whether they 14 15 submit those because inpatient hospitalizations 16 are DRG related on whether they include a specific line item. 17 18 When we've looked previously at the 19 association between dialysis facilities and 20 hospitals, the paradigm that you develop, it's much more complicated than that. 21 22 Most freestanding dialysis facilities

have relationships with more than one hospital. 1 2 There's a subset that there's a geographic singularity, but it's much more complicated than 3 that. 4 And I would say I think the majority 5 of facilities have relationships with more than 6 7 one hospital, although geographic issues may still come into play. 8 The reason I had the card up is in the 9 10 reviewers statement, I wanted to correct one, what I think, is factual omission. 11 There are a number of hereditary anemias, hemolytic anemias, 12 13 that are included in a bunch of sickle cell variants, sickle cell C diseases and others. 14 15 So, there's a whole family from the 16 categorical -- the hierarchical coding system, CMS coding system of hereditary anemias, not just 17 18 sickle cell that are part of the exclusion list 19 and the code table that was included with the 20 submission. CO-CHAIR ANDERSON: So, just a quick 21 22 Have you empirically tested if you follow-up.

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DR. MESSANA: We have not. We have a breakdown of revenue center codes that are isolated that don't have a procedure code with them and how much overlap there is. And a sizable minority are based on revenue center codes only. So, that's why we were careful to label transfusion events because we probably are systematically undercounting units of blood transfused with this methodology. We can say one or more blood transfusion was administered but on this day and only if we have granularity from procedure codes can we say that for sure that were two or more or two or multiple transfusions provided on a day. CO-CHAIR ANDERSON: But for those patients, you have granularity available. I just want to make sure I understand the numerator. You will use it in those cases. Neal R. Gross and Co., Inc.

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treat procedure codes the way you treat revenue centers, if any findings for facilities change on their O/E? 221

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So, there's patients that don't have 1 2 granularity so we just say, okay, you're one. But this patient where procedures were 3 systematically, you could give them a six, you 4 could give then an eight if they got eight units 5 of blood because you -- although I think you can 6 7 only do one procedure per day, correct? So, it'd be a max of one unit per day. 8 9 But if you're in the hospital for three weeks and 10 that hospital uses that schema, you can get up to 11 And then -one a day. 12 DR. MESSANA: Right, it's one event per day maximum. 13 CO-CHAIR ANDERSON: But, in theory, if 14 15 they got transfusions on eight different days, 16 that patient would get a numerator eight, but at this other hospital where we use revenue center 17 18 codes, they could get 40 units and it would count 19 as one, is that a correct understanding? 20 CO-CHAIR ANDERSON: Frank? DR. MADDUX: So, I would say to 21 22 Lorien's question, it brings up again the issue

that many, many hospitals are, in fact, do have 1 2 transfusion policies and protocols that will be followed for the transfusions occurring in those 3 hospitals. 4 So, the ability of the measure to be 5 sensitive to what the expected rates are will be 6 7 highly influenced by these particular areas that I think, fundamentally, puts into question some 8 9 of the underlying nature of responsibility for 10 this. CO-CHAIR ANDERSON: All right, let's 11 call for the vote for specifications and 12 13 reliability. MS. OGUNGBEMI: The committee is now 14 15 voting on reliability for Measure 2699. The options are one-high, two-moderate, three-low and 16 four-insufficient. Voting is open. 17 18 The results are zero votes high, seven 19 votes moderate, 13 votes low and three votes for 20 insufficient. 21 The measure does not pass on 22 reliability.

CO-CHAIR ANDERSON: Are there any other 1 2 comments for the developer on the rest of the criteria? 3 Okay. MS. SAMPSEL: Right, so as we have in 4 the past, you know, the developer now has, and 5 this will go through public comment. 6 7 But the developer could also bring additional information back to you when it comes 8 9 to providing additional information on this measure for consideration. 10 11 Are there any additional insights or 12 recommendations you would like to provide to the 13 developers? DR. DALRYMPLE: So, my recommendation 14 15 would be to consider doing the empirical testing to see if what you observed changes if you treat 16 procedure codes the same as revenue centers since 17 18 you have the data and could just empirically 19 compare those two. 20 DR. MESSANA: Okay, thank you. DR. KRISHNAN: Maybe to follow-up on 21 22 that, if there's regional variances like Frank

was saying, because regional variances may be due
 to hospital level or physician level, transfusion
 practices as well as the flavor that they're
 using for coding the transfusions.

5 DR. DALRYMPLE: So, is there anything 6 we could recommend as a committee that would help 7 reassure us that this isn't all being drive by 8 hospital practices and facilities warrant 9 accountability because we're not managing anemia 10 correctly?

Because I think that's one of the concerns, right? We want to make sure this reflects quality of care to dialysis facility, not transfusion practices and behaviors at a hospital level.

So, is there any analysis that would help us understand whether that's what's occurring? I think that's what you're proposing, but is there a way to look at that? CO-CHAIR CROOKS: And my comment is to go back and really examine what kind of measure is this? If it seems that it probably is not an

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process measure. There's a great deal of uncertainty on Neal R. Gross and Co., Inc. Washington DC

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outcome, and I like Louis Diamond's definition that an outcome is something that happens to a patient.

I haven't really thought the subject 4 through, but that seems to make sense and I don't 5 know if it's a process metric or an intermediate, 6 7 but I think that needs to be thought through and clearly presented so that the committee doesn't 8 9 end up having to try to decide what kind of a 10 measure it is.

11 DR. MESSANA: So, I'll respond to that 12 comment, Peter.

13 We spent months trying to figure out whether this was cubbyholed as an outcome measure 14 15 or as a process measure. Using Dr. Diamond's 16 suggestion that something that happens to a 17 patient, transfusions happen to patients.

So, from one perspective, some of the 18 19 members of our group felt strongly that it was an 20 outcome measure, while others thought of it as a 21

our part about what defines whether this fits a 1 2 definition of an outcome or a process measure. So, I certainly appreciate and 3 understand the multitude of opinions around the 4 table about that. 5 MS. HARTWELL: I just had a quick 6 7 comment and just looking at it from the patient's perspective, is there ever a way there could be a 8 9 change in policy where patients could get a blood transfusion in a clinic? 10 Because it's a very big inconvenience 11 to go to the hospital to get a clinic to get a 12 13 transfusion and have it be reimbursed outside the 14 bundle. But just a thought. 15 DR. MESSANA: So, Lori, maybe we could 16 -- you could ask me that -- my opinion about that offline but you've got a lot of other things to 17 18 do. So, I'll defer for a time. 19 CO-CHAIR CROOKS: So, we're going to 20 pause -- another pause that refreshes. You are now going to be randomly selected for a two or 21 22 three year term with this committee, if you still

1want to serve. No, that's not an option, sorry.2And Poonam is going to do the process3MS. BAL: As the process, whenever you4pick out a number, please into the microphone say5your name and the number that you received for6your term. It's going to be a two or a three.7MS. HARTWELL: Number three. Oh, Lori8Hartwell, number three. So, what does this mean?9Oh, okay, I guess that's what numbers are in10there?11DR. MADDUX: This is Frank Maddux, two12years.13DR. GREENSTEIN: Stu Greenstein, three	
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DR. MADDUX: This is Frank Maddux, two years.	
12 years.	
13 DR. GREENSTEIN: Stu Greenstein, three	
14 years.	
15 MS. OGUNGBEMI: I mean I'm writing it	
16 down but the transcript's also getting it.	
DR. KASKEL: Rick Kaskel, three years.	
18 Does this count if you're retired?	
19 CO-CHAIR CROOKS: As an individual, no	,
20 just for a	
21 DR. SOMERS: Michael Somers, three.	
22 DR. BHAN: Ishir Bhan, three.	

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1	DR. DALRYMPLE: Lorien Dalrymple, two.
2	MS. PAVLINAC: Jessie Pavlinac, two.
3	MS. LENNING: Karilynne Lenning, three.
4	DR. NARVA: Andy Narva, life without
5	parole. No, three.
6	DR. WAGNER: John Wagner, two.
7	DR. STEIN: Dodie Stein, two.
8	MS. WAGER: Bobbi Wager, two.
9	DR. HAIN: Debbie Hain, two.
10	MS. EVANS: Beth Evans, two.
11	DR. FISCHER: Michael Fischer, two.
12	DR. KLIGER: Alan Kliger, one. No,
13	three.
14	DR. KRISHNAN: Mahesh Krishnan, three.
15	DR. LATTS: Lisa Latts, two.
16	DR. KLEINPETER: Myra Kleinpeter,
17	three.
18	CO-CHAIR CROOKS: Peter Crooks, three.
19	CO-CHAIR ANDERSON: Connie Anderson,
20	three.
21	DR. ZARITSKY: Joshua, two.
22	CO-CHAIR CROOKS: Okay. Next up is

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1	2701.
2	DR. JONES: Thank you from KCQA in
3	particular for moving the schedule up. We
4	appreciate that.
5	KCQA is pleased to review our two
6	fluid management measures with the committee.
7	2701 is one of the two fluid
8	management measures developed and tested by KCQA.
9	2701 measures the percentage of adult in-center
10	hemodialysis patients in the facility whose
11	average UFR is greater than or equal to 13 ml/kg
12	per hour. In this case, the lower score is a
13	better performance.
14	Facilities succeed on the measure and
15	are not counted in the numerator if the dialyzed
16	patients at an average of UFR less than 13 and/or
17	dialyzed patients for an average of greater than
18	240 minutes per session.
19	I would like to focus on a couple of
20	the pre-meeting committee comments.
21	One reviewer noted that we did not
22	present any information on the reliability of

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data source used in the testing. That is, the 1 2 data warehouses of three large dialysis organizations that participated in the testing. 3 With the exception of patient weights, 4 all necessary data elements for the measures are 5 collected via what NOF refers to as an 6 7 authoritative source currently with care delivery. Specifically, data are entered 8 9 electronically and are not abstracted, coded or 10 transcribed by any other person. 11 Because the patient weight data in some instances require transactions from chair 12 13 side to the electronic system, we conducted and reported reliability testing at the level of the 14 15 measure sources, which, again, is consistent with 16 NQF. The data are the same as those batched 17 18 submitted to CMS for CROWNWeb. 19 There were questions about the time 20 component in the numerator which is one of the major differences between KCQA and CMS's measure. 21 22 KCQA considers the time component a

critical element. Rather dictating the UFR 1 2 remain at or below 13, the length of the session component of the measure allows judicious use of 3 UF rates above 13 as long as the patient is 4 dialyzed for more than 240 minutes. 5 With a measure to focus exclusively on 6 7 the UFR without taking time into consideration, some patients may require significantly longer 8 9 dialysis treatments beyond four hours, increasing 10 the chance that they may refuse. The time 11 component is also necessary to avoid potential adverse unintended consequences of implementing 12 13 the measure on other patients who follow that 14 patient. In other words, if they have to go 15 more than four hours, it might bump into the next

16 more than four hours, it might bump into the next 17 patient schedule. Only perspective testing can 18 address the frequency with which this scenario 19 can occur.

Lastly, I would like to address the other major difference between KCQA and CMS measure, which is that our measure is specific to

the average rate for the session during the week 1 2 that Kt/V is measured and the CMS measure relies on data for a single session. 3 We believe the average is more 4 accurate and voids potential gaming. We also 5 believe relying on a single data point is a 6 7 threat to validity. We provided the committee with 8 9 additional data demonstrating that one of the 10 LDOs analyzed and confirmed that facilities who 11 have a Monday/Tuesday, Kt/V cycle perform more 12 poorly than those who have Wednesday/Thursday 13 Kt/V cycle. Thank you for considering this. 14 15 CO-CHAIR CROOKS: Thank you. 16 All right, our discussants for this measure are John Wagner and Michael Somers. 17 18 Who's going to kick it off? Michael? 19 DR. SOMERS: I can, yes. 20 So, in terms of evidence, we are provided with a KDOQI Guideline, which is a 21 22 workgroup consensus opinion regarding the need

for the patient to be euvolemic and it does 1 2 mention that some patients need to have extended HD times and slower UF. There's no real evidence 3 in this guideline regarding outcomes and why this 4 is ---- as a process or intermediate outcome is 5 worthwhile. 6 7 There's also literature review provided. Three of the pieces are opinion 8 9 pieces. One's data from a registry, nine are cohort or analysis of large data samples from 10 cohort studies. That's the evidence. 11 CO-CHAIR CROOKS: I should mention that 12 13 three committee members are precluded from discussing or voting, Constance Anderson, Lori 14 Hartwell and Mahesh Krishnan. 15 Okay, John? 16 DR. WAGNER: Right. I just would point 17 18 out that the measure requires either having 240 19 minutes and if one does not have 240 minutes, one 20 needs to have an ultrafiltration rate that is less than the threshold. 21 And none of the articles addressed 22

that kind of a combination, why one 240 minute 1 2 time threshold would be equivalent to an ultrafiltration rate that is whatever one wishes 3 to define. 4 And although many of -- some of the 5 articles -- at least I guess the modality of the 6 7 articles mention four hours as a cut point. Some of the articles mention different timeframes as 8 9 cut points and other articles mention different 10 ultrafiltration rates as cut points for risk. 11 CO-CHAIR CROOKS: Okay. The floor is 12 open for other comments on the evidence. You've 13 got it. MS. EVANS: I just have a question. 14 On 15 the UFR rate, is it greater than 13 ml/kg per 16 hour or is it greater to or equal to -- it's conflicting in that preceding comment, the data 17 on that? 18 19 And four hours, is it over four hours 20 or is it over and equal to four hour dialysis time? 21 22 CO-CHAIR CROOKS: Would you like to

respond? 1 2 DR. JONES: Yes, the UFR is greater than and equal to. The time is more than 240 3 minutes or more. 4 CO-CHAIR CROOKS: Okay, Lorien? 5 DR. DALRYMPLE: And I just have a 6 7 question for the workgroup and reviewers. In the end, what was your overall 8 9 sense of the evidence as it relates to this 10 measure? What would you have --DR. WAGNER: I think there are evidence 11 that this associates to increased time with 12 13 better outcomes. Again, whether it's 240 minutes or not is I think a little bit vague in the 14 15 literature. 16 And as far as what the actual ultrafiltration rate that should be targeted as 17 18 the best rate above which one does not wish to 19 go, I think it's unclear. So I think the evidence there is a little bit weaker about what 20 the best rate is. 21 CO-CHAIR CROOKS: Yes, my impression 22

was -- I was in a workgroup ---- that there was 1 2 no systematic review presented or meta-analysis, but there was quite a few articles and 13, I 3 think, and the preponderances and some way or 4 another, you know, high UF bad, short dialysis 5 bad. 6 7 And the KDOQI committee in 2006 came up with -- considered it Grade A evidence. 8 9 DR. WAGNER: Yes, I think though --10 that guideline really speaks to achieving the dry weight ---- the euvolemic weight in avoiding 11 12 hypertension. 13 So that really -- while it supports an effort to define how you get there, it really 14 15 doesn't -- that guideline doesn't speak to how 16 you get there. And of course, this guideline -this metric does not attempt to define what the 17 18 target weight is by any particular standard. 19 CO-CHAIR CROOKS: Yes, so the evidence 20 isn't as strong as we'd like. It's begging out for clinical trials and I don't know if that'll 21 22 ever be done or not, but evidence being what it

is, I think it's reasonably strong. 1 2 Oh, I'm sorry, Frank? DR. MADDUX: So I'd just say that as 3 we've moved some of the dose of dialysis measures 4 into reserve status, this kind of measure, I 5 think, begins to breakdown in a more granular 6 7 nature some of the issues that are components of what the original Kt/V was. 8 9 And whether it's time, ultrafiltration 10 rate or the impact of intradialytic weight gain, I think all of those become a rationale of which 11 there's a pretty large body of literature that 12 13 you could extend through the transitive property to say is related to this particular topic. 14 15 And it strikes me that there's not 16 nearly as much known about this because we've been concentrating on the more global measure at 17 18 this point and I think we have to recognize that 19 it's not going to be quite as mature as some of 20 the other measures. CO-CHAIR CROOKS: Okay. 21 Other 22 considerations about the evidence -- body of

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evidence? 1 2 Okay, we're ready to vote then. MS. OGUNGBEMI: The committee's now 3 voting on Measure 2701 and its evidence. 4 The options are 1 high, 2 moderate, 3 5 low and 4 insufficient. Voting is open. 6 7 CO-CHAIR CROOKS: Mahesh, I see a voting stick in your -- oh, thank you. You're 8 9 having a conflict of interest. 10 MS. OGUNGBEMI: So, we will only have 20 votes since three committee members recused 11 themselves. 12 13 The results are zero votes high, 17 votes moderate, two votes low and one vote 14 15 insufficient. 16 Measure 2701 passes on evidence. CO-CHAIR CROOKS: Okay, thank you. 17 18 Gap? 19 DR. SOMERS: So for gap we're given 20 data from 4,252 hemo facilities, over 412,000 patients, shows that from this group a median of 21 22 10.8 percent would not have met this measure with

a range from zero to 50 percent. 1 2 CO-CHAIR CROOKS: John, any other 3 comments? DR. WAGNER: 4 No. CO-CHAIR CROOKS: Okay. All right, 5 well, let's vote on the gap then if nobody wants 6 7 to say anything further. MS. OGUNGBEMI: The committee is now 8 9 voting on performance gap for Measure 2701. The options are 1 high, 2 moderate, 3 low and 4 10 11 insufficient. Voting is open. The results are three votes high, 16 12 13 votes moderate, one vote low and zero votes insufficient. 14 15 Measure 2701 passes on performance 16 gap. CO-CHAIR CROOKS: Okay, thank you. 17 18 Now specifications and reliability. 19 DR. SOMERS: So for specifications, 20 it's specified for CROWNWeb and all the data elements in the directions for data capture was 21 22 included. It's not risk-adjusted.

In terms of reliability testing, 1 2 there's data, again, given from the 4,252 dialysis facilities. They looked at the facility 3 and treatment month as independent variables and 4 they measured the score as variable intraclass 5 correlation coefficient between 0.6 and 0.7 for 6 7 the three LDOs which fell into a level of -- a good level of reliability. 8 9 CO-CHAIR CROOKS: John? 10 DR. WAGNER: Nothing to add. 11 CO-CHAIR CROOKS: Okay. Lorien? 12 Thank you. 13 DR. DALRYMPLE: Can I just clarify one point on this? So, was the reliability testing 14 15 done with the LDOs all sending their data or was 16 it done on CROWNWeb? Because I thought one of the comments 17 18 I saw was, does CROWNWeb have three measures of 19 weights each month? And I don't know CROWNWeb 20 well enough to know. So I don't know if other committee members have more insight into CROWNWeb 21 22 and what data's collected monthly and then maybe

the primary reviewers just clarify on how the 1 2 reliability testing was done versus the stats? Yes, so I didn't know if 3 DR. WAGNER: this was under feasibility, but this is obviously 4 a data set that is generated by proprietary 5 databases and it is assumed that CROWNWeb can be 6 7 configured to provide the same data. So, the data will be from the week 8 9 that the Kt/V is calculated in that. It could be 10 three or four treatments during that week. And 11 so, I don't think CROWNWeb currently captures that information, so it would have to be put into 12 13 the system and software developed around it. CO-CHAIR CROOKS: Is that correct? 14 15 DR. MCGONIGAL: Yes, that is correct. 16 We collected it through the LDOs. It's not proprietary databases, they were data warehouses, 17 18 same information that's sent to CROWNWeb. 19 At this point, CROWNWeb is collecting 20 one data point and so that would need to be expanded to the three. 21 22 And I think that's all you asked. Did

I miss something? Okay. 1 2 CO-CHAIR CROOKS: That's it. Okay. DR. MCGONIGAL: Oh, yes, one other 3 thing, we exclude four or greater treatments per 4 So it would only be three maximum. 5 month. DR. DALRYMPLE: I think in the specs 6 7 it says greater than four are excluded. So if it's four or more we may just need to be -- and 8 9 some of the exclusions it mostly says greater 10 than four. 11 DR. MCGONIGAL: Four or more is the exclusion. 12 13 CO-CHAIR CROOKS: Right. So, they're stipulating that they meant --14 15 DR. DALRYMPLE: Details, but we're 16 going to limit to thrice weekly? Okay. Does anyone know if this has been 17 18 proposed to CROWNWeb and would be feasible in the 19 near future to have the three? 20 DR. JONES: Yes, it has been. There's some discussions about, you know, picking up on 21 22 the three treatments.

CO-CHAIR CROOKS: Okay. Other 1 2 comments? Okay, let's vote on reliability. MS. OGUNGBEMI: The committee is now 3 voting on reliability for Measure 2701. The 4 options are 1 high, 2 moderate, 3 low and 4 5 insufficient. Voting is open. 6 7 The results are unanimous, zero votes high, 19 votes moderate, zero votes low and zero 8 9 votes insufficient. Measure 2701 passes on 10 reliability. 11 CO-CHAIR CROOKS: Thank you. On to 12 validity. 13 DR. SOMERS: In terms of validity, the facility-specific scores were compared to SHR and 14 15 SMR. The correlations were in the preoperative 16 direction and statistically significant. CO-CHAIR CROOKS: John? 17 18 DR. WAGNER: I guess the only question 19 I would have is if the SHR and SMR are going to 20 be under review and we don't know what the outcome of those reviews are, is it fair to have 21 22 validity testing then that relies on those

measures or is that a moot point? 1 2 CO-CHAIR CROOKS: Well, they're not under review yet and we still --3 MS. SAMPSEL: They're technically 4 endorsed measures. 5 CO-CHAIR CROOKS: Yes. 6 7 MS. SAMPSEL: And in current use. CO-CHAIR CROOKS: So I don't think we 8 9 need to worry about that. I'd just like to 10 mention they also claim face validity with this 11 KCQA Steering Committee and testing workgroup, for what it's worth. 12 13 Okay, any other comments on validity? 14 Let's vote. 15 MS. OGUNGBEMI: The committee is now 16 voting on validity for Measure 2701. The options are 1 high, 2 moderate, 3 low and 4 insufficient. 17 18 Voting is open. 19 The results are two votes high, 16 20 votes moderate, one vote low and zero votes 21 insufficient. Measure 2701 passes on validity. 22 CO-CHAIR CROOKS: Okay. Thank you.

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Feasibility?

DR. SOMERS: Well, in terms of both feasibility and usability, the comments that have 3 been made already about some tweaks in CROWNWeb were pertaining.

But otherwise, the workgroup thought that the data would be generated or collected during usual provision of care through EHRs.

> CO-CHAIR CROOKS: John?

10 DR. WAGNER: So I quess it would be perhaps important to know how difficult it will 11 be to configure CROWNWeb to capture these data 12 13 and to understand. Given the issues that CROWNWeb has with capturing all of the data, 14 15 whether this would be a particular problem in 16 this case for this metric.

CO-CHAIR CROOKS: Because as it 17 18 stands, there's any patient dialysis as an 19 independent or small chain unit is not going to 20 be captured. Right? 21 DR. MCGONIGAL: I'm sorry, are you

22 asking --

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CO-CHAIR CROOKS: I'm asking you that 1 2 question, yes. DR. MCGONIGAL: Yes, so I missed part 3 of the question but you're talking about the 4 smaller --5 CO-CHAIR CROOKS: Well, the --6 7 DR. MCGONIGAL: -- that non-batch submitters, is that correct? 8 9 CO-CHAIR CROOKS: Right. But you're 10 not even using CROWNWeb at all. Right? 11 So, at the present time, when you do this measure it excludes independent dialysis 12 13 units and small chains. MS. NISHIMI: That was for the 14 15 testing. We've been in conversation with CMS 16 about adding the two extra data points so the batch submitters would batch three and the rest 17 18 of the facilities would have to manually enter 19 the additional two, as they now manually enter 20 one. CO-CHAIR CROOKS: So the plan is 21 22 definitely to get all units under the umbrella?

	4
1	MS. NISHIMI: Oh, yes. No, there was
2	never
3	CO-CHAIR CROOKS: If we can get the
4	all right, good.
5	Other issues with feasibility?
6	MS. EVANS: Home hemo will be included
7	or not?
8	CO-CHAIR CROOKS: Pardon me?
9	MS. EVANS: Home hemo?
10	CO-CHAIR CROOKS: Home hemo, will they
11	be included?
12	MS. EVANS: Are they included or not?
13	DR. MCGONIGAL: This is in center.
14	MS. EVANS: In center, okay.
15	CO-CHAIR CROOKS: It's not, yes.
16	Okay. Any other issues on
17	feasibility? Let's vote.
18	MS. OGUNGBEMI: The committee is now
19	voting on feasibility for Measure 2701. The
20	options are 1 high, 2 moderate, 3 low and 4
21	insufficient. Voting is open.
22	The results are two votes high, 15
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votes moderate, one vote low and one vote 1 2 insufficient. Measure 2701 passes on feasibility. 3 CO-CHAIR CROOKS: Okay. Usability and 4 5 use? DR. SOMERS: I don't think we have any 6 7 new comments. We've covered that I think. CO-CHAIR CROOKS: No comments? 8 9 DR. SOMERS: Well, nothing new than what we didn't discuss with feasibility. I mean 10 I think that with the tweaks that needed to be 11 made, we thought that it could be usable. 12 It's 13 not currently being used. CO-CHAIR CROOKS: Okay, it's not 14 15 currently in use. Pay -- state plan public 16 reporting, could be used for plan payment, QI 17 use. 18 Okay. Other concerns or comments 19 about usability and use? I see people have --20 oh, Lorien? DR. DALRYMPLE: I'm not sure, it seems 21 22 like our developers want to share something with

Sarah, can we --1 us. 2 MS. SAMPSEL: No, I'm --DR. DALRYMPLE: -- inform our 3 conversation about usability because perhaps we 4 don't understand, aside from CROWNWeb, if this is 5 usable. 6 7 MS. SAMPSEL: So I mean I guess what I'm trying to do is only if there are questions 8 9 specifically to the developers that would help you in your consideration, that's when we want to 10 11 direct to the developers. But we're trying to move this along. 12 13 DR. DALRYMPLE: I will just ask one question with that in mind. 14 15 Is there usability outside of CROWNWeb 16 implementing these changes? DR. JONES: In at least one large 17 18 dialysis organization, this is reported out on a 19 monthly basis. And for internal QI purposes, 20 both the length of dialysis and the fluid rate and the time. So at least in that one large one 21 22 it's used.

CO-CHAIR CROOKS: Any other comments? 1 2 Okay, let's vote, usability and use. MS. OGUNGBEMI: The committee is now 3 voting on usability and use for Measure 2701. 4 The options are 1 high, 2 moderate, 3 low and 4 5 insufficient. Voting is open. 6 7 The results are two votes high, 15 votes moderate, one vote low and one vote 8 9 insufficient. Measure 2701 passes on usability 10 and use. 11 CO-CHAIR CROOKS: So, so far all the 12 criteria have been met. Now we're going to vote 13 on submitting for recommending endorsement. Any 14 other comments before we vote? Okay, pick up 15 your sticks. 16 MS. OGUNGBEMI: The committee is now voting on Measure 2701's overall suitability for 17 18 endorsement. Options are 1 yes, 2 no. Voting is 19 open. 20 Results are 19 votes yes, zero votes Measure 2701 passes it's meeting NQF 21 no. criteria for endorsement. 22

1 CO-CHAIR CROOKS: Okay, th 2 And don't go away because we're going 3 to 2702, Post-Dialysis Weight Above an 4 Target submitted by KCQA. 5 You have the floor.	to go next
<ul> <li>3 to 2702, Post-Dialysis Weight Above an</li> <li>4 Target submitted by KCQA.</li> </ul>	-
4 Target submitted by KCQA.	d Below
Vou have the floor	
5 You have the floor.	
6 DR. JONES: Thank you. Me	asure 2702
7 is the percentage of patients with the	average
8 post-dialysis weight greater than equa	l to one
9 kilogram above or below their prescrib	ed target
10 weight.	
11 First, I want to emphasize	that KCQA
12 believes that this measure complements	and serves
13 as a check and balance to the measure	we just
14 spoke about.	
15 Implemented alone, the spe	cifications
16 of 2701 could be met simply by underdi	alyzing the
17 patient by decreasing UFR.	
18 Concurrent implementation	of this
19 weight measure will minimize the poten	tial for
20 such an unintended consequences as pat	ients
21 underdialyzed in such manner will unli	ke meet
22 their target weight.	
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goal of consistently bringing patients to an end dialysis weight falling within a narrow margin of their defined target weight to achieve optimal state.

5 We know one study found absolute 6 weight is more important than percentage weight. 7 An additional small study of 182 patients 8 suggested adverse consequences when the target 9 weight was missed by more than 0.3 kilograms.

Evidence identified during our testing indicated there is significant performance gaps using the one kilogram. This value was the consensus of our steering committee, measure feasibility and testing group for the purpose of this measure.

We posit the need for performance improvement and fluid management for dialysis patients and the current absence of measures addressing this important aspect of care are best served by our consensus value of one kilogram. We further acknowledge that the ambiguity is existing in protocols for

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determining the dry weight. But, again,
 emphasized the need for performance measures in
 this area.

4 If the committee does not believe our 5 reliance on our expert opinion and factors, such 6 as lack of standardized protocols are sufficient 7 to specify this target aim, we maintain if you 8 utilize the NQF evidence algorithm you would 9 still end up with insufficient but exception 10 decisions.

Thank you.

12 CO-CHAIR CROOKS: And once again, the 13 same three people are excluded from participation 14 and our discussants are Myra and John again.

15 It seems like you guys get called on 16 a lot. Did you get more than two? Who's going 17 to go first? John?

18DR. WAGNER: Go first? Okay, thank19you.20So the numerator is the number of21patients from the denominator with the average

post-dialysis weight gain equal to or greater

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1 than one kilogram above or below the prescribed 2 target weight during the calculation period. 3 And the denominator exclusions are the 4 following patients: patients less than 18 years 5 of age, home dialysis patients, patients in 6 facilities less than 30 days, patients with less 7 than seven hemodialysis treatments in a facility 8 during a month, patients without a 2728, kidney 9 transplant patients with a functioning graft. 10 And then there's an unanswered 11 question as to how many in-center hemodialysis	
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9 transplant patients with a functioning graft. 10 And then there's an unanswered	
10 And then there's an unanswered	
11 guestion as to how many in-center hemodialysis	
12 patients during the reporting month need to be	
13 present in order to have the facility count	
14 within this measure.	
15 There isn't an exclusion for greater	
16 than three treatments as we heard in the other	
17 measure. I'm not sure if that was an oversight	
18 or not.	
19 So the evidence is, again, related to	
20 that KDOQI Guideline which argues that patients	
21 should be ultrafiltered to a target optimal dry	
22 weight. It doesn't and the evidence level was	

2 And in addition, the developers have an expert consensus panel in the KCQA membership 3 and they also reviewed 14 studies that looked at 4 issues related to technology that was used to 5 define target weight, what the intradialytic 6 7 weight gain were in various populations and what happens when one tries to achieve target weight 8 9 and various adverse events.

The issue here is we're not defining 10 11 what euvolemia is, we're basically allowing the clinicians to decide whatever target weight they 12 13 choose based on whatever criteria they use. And then taking the one kilogram plus or minus value 14 15 as being a surrogate for what presumably is going 16 to be helpful to achieving euvolemia and control of hypertension. 17

So I think in terms of the evidence that is presented and the actual guideline, there is a little bit of a disconnect. This is kind of like the issue with testing for whether parachutes work or not.

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I mean everyone knows that you want to prescribe a target weight. That's part and parcel of the dialysis prescription. And if one is doing that, one presumably intends that target weight to be achieved. So there should be some metric around that.

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7 But in terms of what the evidence that 8 that result will speak to quality, particularly 9 if there are patient-centered factors that also 10 impact on achievement of that target weight and 11 there's no discussion in the evidence about what 12 the patient-centered factors will do to one's 13 ability to change the target weight.

And because of patient-centered factors, there might be a decision to move the target weight away from what one conceives to be the euvolemic weight. So there's no evidence presented around that subject either.

DR. KLEINPETER: So basically since there's very little evidence that's being presented because it's a new measure, there is, once again, statements regarding the importance

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of establishing the target weight. But we just
 had just the testing data provided by the
 developer thus far.

4 CO-CHAIR CROOKS: Okay. The floor is 5 open for discussing the evidence base linking it 6 to the measure, linking positive health outcomes 7 to the measure.

8 I might comment that I'm having 9 trouble with this issue of knowing what the dry 10 weight is and I know we don't have that worked 11 out yet. But it seems to me that a patient could 12 just be set at some weight and hitting this 13 target all the time and be way off from where 14 they should be.

Unfortunately, there's not another measure to link it to which is -- you know, the right target weight is, but I don't know that the evidence can really link this per se to better health outcomes.

DR. SOMERS: I know you have to pick

Michael?

some target, but again, I'm not aware of any

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evidence saying that one kilo is better than 1.1 1 2 kilo or 0.8 kilos. CO-CHAIR CROOKS: Who else? Franklin? 3 I just have a question DR. MADDUX: 4 for the developers. 5 Were there any exclusions or how did 6 7 you expect to deal with patients that sign off early or actually don't have some proportion of 8 9 their prescribed treatment actually delivered? 10 Were they simply added in as failures or were 11 they treated differently? 12 DR. MCGONIGAL: During our testing, 13 they were not treated differently. If they didn't achieve the target weight, they just 14 15 weren't counted in the numerator. 16 So it was considered as a fail, part of the rationale being that, you know, increasing 17 18 patient education on the importance of staying on 19 for their prescribed times and so underlying 20 that. CO-CHAIR CROOKS: I'd like to hear 21 22 some more thoughts from the committee if you

1 think the evidence really supports that this will 2 improve health outcomes. You do, you don't? 3 Anybody? Frank?

I'd just simply say fluid DR. MADDUX: 4 overload hospitalizations are an enormous 5 component of comorbidity in this population and I 6 7 think trying to shine a light on those particular issues through the achievement -- both the 8 9 assessment of an appropriate target weight and 10 the achievement of that are, I think, key issues 11 in trying to look at how you prevent that type of 12 morbidity.

13 CHO-CHAIR CROOKS: So it's a window, 14 but not a perfect window to -- other committee 15 members? Lorien?

DR. DALRYMPLE: I think sometimesthere are practical challenges.

For example, we're often -- I think sometimes there are practical challenges that doesn't necessarily negate it but often while we're challenging dry weight, we're not represcribing the dry weight on a daily basis, and

it's understood that, perhaps, this would make us better and each day prescribe a new dry weight and continue to challenge from there.

And then when people return from the 4 hospital, it's not uncommon -- at least in my 5 experience, that they come back eight to ten 6 7 kilos over their dry weight and it takes us, unfortunately, time to get there. Not that that 8 9 doesn't mean this isn't important, but it can be 10 very challenging given the frequency of 11 hospitalization in our patients.

But I appreciate the balance of these two measures combined. But I could actually see where you would do well on one and poorly on the other. So I'm trying to reconcile then what does your quality look like?

And I'd actually be curious what other -- and I know we're short on time -- what other committee members think about if we have two quality measures on volume, one you look wonderful, one you look terrible, what the summary of that meaning is.

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was reading -- I didn't review this, I was 1 2 reading what KDOQI says. I mean their focus is on dry weight, but kind of what Michael said, 3 they don't -- there's no evidence for this 4 5 parameter around how close you get to it as stipulated. 6 7 You know, and I haven't reviewed all the other 13 studies, but I don't know if the 8 9 reviewer or the developer had rationale for choosing ---- putting all the side dishes around 10 11 determining an optimal dry weight, around kind of this boundary around which is deemed optimal 12 13 performance. CO-CHAIR CROOKS: Thank you. 14 Other 15 comments? Alan, your card's still up. Okay. 16 All right, I think it's time to vote on the evidence. 17 18 MS. OGUNGBEMI: The committee is now 19 voting on evidence for Measure 2702. The options 20 are 1 high, 2 moderate, 3 low and 4 insufficient. Voting is open. 21 22 The results are zero votes high, three

votes moderate, seven votes low and nine votes 1 2 insufficient evidence. Measure 2702 fails on evidence. 3 CO-CHAIR CROOKS: So we can talk about 4 voting on an exception -- is that why you what 5 you were raising your hand for? 6 7 So the floor is open for proposal to consider an exception at this time. 8 9 DR. DALRYMPLE: So I propose we vote 10 on insufficient with exception given the evidence discussion. 11 CO-CHAIR CROOKS: Would any others 12 13 like to provide rationale for, against? Lisa? DR. LATTS: So I am -- this seems to 14 me to be one where if -- we let the perfect be 15 16 the enemy of the good. I mean it seems to me like this is a good thing to measure and we might 17 18 not have the exact right numbers, but it's 19 probably a decent ballpark. 20 And this seems to me one that we should get -- and I realize it's easy for me to 21 22 say it because I'm not getting reimbursed based

It seems to me that this is one as a on this. 1 companion measure to the ultrafiltration measure 2 and it seems to be something that is really 3 important in the scheme of dialysis. 4 And that for that reason, even though 5 we don't have the perfect data to say that these 6 7 are the exact right numbers, I would be in favor of moving forward with it and tweaking as we go 8 9 rather than not continuing the discussion. 10 CO-CHAIR CROOKS: Thank you. Would 11 anybody else like to express a viewpoint? Okay, well, then I think we'll just --12 13 is this a hand vote that we do? No, this is a real vote. 14 MS. BAL: 15 CO-CHAIR CROOKS: Okav. 16 I mean machine vote. MS. BAL: 17 CO-CHAIR CROOKS: Once again, grab 18 your sticks. MS. OGUNGBEMI: The committee is now 19 20 voting on importance to measure and report for evidence with the potential exception to 21 empirical evidence. 22

The options are 1 insufficient 1 2 evidence with exception, and 2 no exception. The results are ten insufficient 3 evidence with exception and nine for no exception 4 and that's actually gray-zoned. So I'm actually 5 not sure -- hold on one second. 6 7 So we're going to move forward. CO-CHAIR CROOKS: We have a majority 8 9 who would like to see this continue with an 10 exception to the evidence. So we will go on to 11 gap. 12 DR. WAGNER: Okay. So the measures --13 there were data from over 400,000 hemodialysis treatments across three organizations. 14 15 And the interguartile range was 14 16 percent suggesting that there was a potential for some intervention that might -- if one believes 17 18 this is an outcome, rather something that would 19 improve health, that this lends itself to that. 20 CO-CHAIR CROOKS: Okay. Other comments on the performance gap? Okay, let's 21 22 vote then.

MS. OGUNGBEMI: The committee is now 1 2 voting on performance gap for Measure 2702. The options are 1 high, 2 moderate, 3 low and 4 3 insufficient. Voting is open. 4 The results are three votes high, 14 5 votes moderate, zero votes low and two votes 6 7 insufficient. Measure 2702 passes on performance 8 gap. 9 CO-CHAIR CROOKS: Okay, specifications 10 and reliability? 11 So specifications, as I DR. WAGNER: mentioned, we don't have exclusions for more than 12 13 three treatments during the week. And also, when there's no adjustment 14 15 or exclusions for patient preference, which I 16 think is one of the major discussions that I think patients will have regarding this. 17 18 And so -- and as far as the 19 reliability testing goes, the ANOVA analysis 20 indicated a moderately high interclass correlation and a high ratio of between to within 21 22 facility correlations.

1	CO-CHAIR CROOKS: Okay. Myra?
2	DR. KLEINPETER: Something else, it's
3	available through CROWNWeb so it should be
4	relatively easy to get at this point.
5	CO-CHAIR CROOKS: Okay.
6	DR. DALRYMPLE: Is this three
7	treatments again?
8	DR. KLEINPETER: Yes.
9	DR. DALRYMPLE: So not currently
10	available through CROWNWeb, but we would assume
11	it would eventually be available through
12	CROWNWeb, correct? Okay.
13	CO-CHAIR CROOKS: Okay. Any other
14	comments on reliability specifications? All
15	right, let's vote.
16	MS. OGUNGBEMI: The committee is now
17	voting for Measure 2702 on reliability. The
18	options are 1 high, 2 moderate, 3 low and 4
19	insufficient. Voting is open.
20	Results are one vote high, 13 votes
21	moderate, five votes low and zero votes
22	insufficient. Measure 2702 passes on

reliability. 1 2 CO-CHAIR CROOKS: Okay. Validity testing? 3 DR. WAGNER: So this correlates to the 4 standardized ratios that we've alluded to before 5 and as well as has high face validity by the 6 7 assessment of the KCQA committee tasked with 8 developing the measure. 9 CO-CHAIR CROOKS: Okay. Myra, any 10 comments? Yes, it looked like they have strong 11 correlation with the measure with SMR and SHR 12 13 too, from my review. Jessie? 14 MS. PAVLINAC: I should have asked 15 16 this earlier, we've been having this discussion. Is this a clinician level or a facility level? 17 18 It's not --19 CO-CHAIR CROOKS: It wasn't specified. 20 MS. PAVLINAC: -- specified and I -sorry, I didn't --21 22 DR. MCGONIGAL: These are all

facility.

2 MS. PAVLINAC: Okay, I just wanted to know who's making the hit in the pocketbook. 3 DR. DALRYMPLE: And was the testing 4 done at facility level or organization level, if 5 that makes sense? 6 7 DR. MCGONIGAL: Facility. DR. DALRYMPLE: Okay, and then 8 9 presented by organization? 10 DR. MCGONIGAL: Absolutely. 11 DR. DALRYMPLE: Is that correct? 12 CO-CHAIR CROOKS: All right, are we 13 ready to vote on validity? MS. OGUNGBEMI: The committee is now 14 voting on validity for Measure 2702. The options 15 16 are 1 high, 2 moderate, 3 low and 4 insufficient. Voting is open. 17 18 Results are one vote high, 16 votes 19 moderate, two votes low and zero votes 20 insufficient. Measure 2702 passes on validity. CO-CHAIR CROOKS: On to feasibility? 21 22 DR. WAGNER: So feasibility has the

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same issues that we discussed in the prior 1 2 metric. CROWNWeb would have to be modified to accept the data. 3 CO-CHAIR CROOKS: Okay. 4 Any additional concerns? Okay, let's vote. 5 MS. OGUNGBEMI: The committee is 6 7 voting on feasibility for Measure 2702. The options are 1 high, 2 moderate, 3 low and 4 8 9 insufficient. Voting has opened. 10 Results are one vote high, 14 votes 11 moderate, three votes low and one vote 12 insufficient. Measure 2702 passes on 13 feasibility. CO-CHAIR CROOKS: Next, is it in use 14 15 and is it usable? 16 DR. WAGNER: So yes, it's not in use. It's a new measure and so -- and presumably, it 17 18 could be used in public reporting and other ways. 19 And I guess the unintended 20 consequences that I would be concerned about would be impact on patients who are not adhering 21 22 to their target weight prescribed by their

clinicians. 1 2 CO-CHAIR CROOKS: Developer comment briefly, please? 3 Again, it is being used in DR. JONES: 4 one large dialysis organization for internal 5 quality reporting purposes. 6 7 CO-CHAIR CROOKS: Lorien? DR. DALRYMPLE: I was just curious if 8 9 we could discuss as a committee whether others 10 had concerns about unintended consequences, such 11 as misprescribing the dry weight to not appear to be achieving it if this was a measure of quality 12 13 and if, generally, the committee thinks the benefits outweigh any potential harms or 14 15 unintended consequences? 16 CO-CHAIR CROOKS: John, you look like 17 you're about to speak. 18 DR. WAGNER: Yes, I mean I think this is a real dilemma for clinicians when one has a 19 20 patient that is clearly not -- who has defined ideas about what their target weight should be. 21 22 Whether it's a weight where they're

clearly overhydrated, but they tolerate it and they want to be at that weight and one decides that that's not the dry weight, one is left with the dilemma of do you order a dry weight or do you order the weight that the patient is only going to allow you to achieve?

7 And you know, I think in my own 8 practice, after struggling with that with the 9 patient, trying to educate the patient, change 10 the patient's mind, I would choose the weight 11 that the patient will allow us to achieve.

And then our facility -- our quality 12 13 control was that we asked the nurses to document whenever a target weight was not achieved within 14 15 0.5 kilograms so that there be some record of why 16 that patient did not reach the target weight and which, sometimes, is not easy to discern from the 17 18 record unless there is a specific note written 19 about that. 20 CO-CHAIR CROOKS: Myra?

21 DR. KLEINPETER: One other thing is 22 those patients who frequently sign off early and

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1	are nowhere near their target weight, how do you
2	handle those in terms of will those people be
3	adversely, I guess, dropped from those facilities
4	for noncompliance?
5	Or will you just have people just
6	adjusting things, just to try and meet with what
7	the patient says they're going to get to?
8	CO-CHAIR CROOKS: Well like many
9	measures, you're not going to hit a hundred
10	percent, I don't think. frankly.
11	DR. MADDUX: So I think to John's
12	point, we routinely use nomenclature that's
13	probably imprecise.
14	So we talk about dry weights, we talk
15	about target weights, we probably never really
16	are prescribing a true dry weight. It's very
17	difficult to assess. We're really looking at
18	target weights that we're trying to achieve for
19	an individual treatment. So I think the measure
20	might actually give us an opportunity to really
21	become more specific in how we use that language.
22	The second thing I would want to point

out is really a question on use to the group or 1 2 the developers. We've never actually talked about a patient level measure, and to Myra's 3 point, in otherwise this would be a potential 4 measure that, in fact, a patient level measure 5 might actually apply because so much of the early 6 7 sign off or the no-show rate or the I'm unwilling to go to that weight you think I should go to 8 9 discussion really is a patient decision. And I don't think we've ever really 10 11 had a patient level potential measure quite like 12 this. 13 CO-CHAIR CROOKS: Did you see someone had cards up and I'm not seeing them? Oh, you're 14 15 saying turn on your mic, dummy. Okay. 16 Okay, so ---- well, Myra, you're --17 oh, you're putting your card down, okay. Ι 18 almost got you. 19 Okay, so I think we're ready to vote 20 on use and usability. MS. OGUNGBEMI: The committee is now 21 22 voting on usability and use for Measure 2702.

The options are 1 high, 2 moderate, 3 low and 4 1 2 insufficient. Voting has opened. The results are one high, 12 moderate, 3 five low and four insufficient. Measure 2702 4 5 passes on usability and use. CO-CHAIR CROOKS: Okay, so we're going 6 7 to vote now on suitability for recommendation knowing that the evidence was -- consensus was 8 9 not reached on making an exception and I think 10 the staff may have some more processing to do on 11 what exactly -- how we proceed, but we can go ahead and vote. 12 13 Assuming that the exception is upheld, would you recommend this for endorsement to the 14 15 NOF? 16 MS. OGUNGBEMI: The committee is now voting on overall suitability for endorsement on 17 18 Measure 2702. The options are 1 yes, 2 no. 19 Voting is open. 20 For Measure 2702, results are 11 votes 21 yes, eight votes no. For Measure 2702, consensus 22 was not reached on meeting NQF criteria for

endorsement. 1 2 CO-CHAIR CROOKS: That's not a gray zone? 3 MS. OGUNGBEMI: So consensus was not 4 reached and this measure would be -- we would 5 have to look at it again at the post-comment 6 7 call. CO-CHAIR CROOKS: Okay. Thank you 8 9 very much. Okay, so do we only have two left? You're kidding? 10 I went back to 2700, 11 oh my goodness, all right. Can you go to work again, Connie? 12 13 CO-CHAIR ANDERSON: No. CO-CHAIR CROOKS: No? 14 15 CO-CHAIR ANDERSON: None of us can 16 since it's a competing measure with the KCQA 17 measure. 18 CO-CHAIR CROOKS: I'm not even finding 19 it here. 20 CO-CHAIR ANDERSON: On the last page. CO-CHAIR CROOKS: Oh, I went the wrong 21 22 Okay, we'll consider Measure 2700. This is way.

1	ultrafiltration rate greater than 13 ml/kg per
2	hour from U of Michigan and CMS.
3	Are the developers here? Yes, okay.
4	Take it away.
5	DR. MESSANA: Such as we are.
6	So I would like to say that I love the
7	KCQA measure about ultrafiltration and I know
8	some in my group have commitment disorder kind of
9	issues, and so they just are very fond of it, but
10	I personally love it. Okay?
11	And the reason I love it is that our
12	measure is very similar fundamentally to the KCQA
13	measure that you discussed earlier. And the
14	similarities I'd like to highlight as you debate
15	the two measures debate our measure.
16	First, there is an approximately 13
17	ml/kg per hour threshold for the two measures.
18	Second, both measures attempt to exclude
19	transient and new patients. Third, the measures
20	share a common evidence basis. And fourth, the
21	two measures, even though they are somewhat
22	different, as is pointed by KCQA, have almost

identical validity and reliability outcome scores 1 2 when you look at them. So they are fundamentally very similar. 3 There are a couple of differences that 4 are noteworthy. KCQA has pointed out that an 5 additional data requirement will be needed in 6 7 CROWNWeb before their measure can be operationalized, okay? At least using CROWNWeb 8 9 data. 10 Ours does not require that. So the 11 potential threat to validity that was raised about our measure when the comments were made 12 13 needs to be weighed against the feasibility Our measure is calculable right now. 14 issue. 15 Okay? 16 However, it's not to say that we disagree with potentially using thrice weekly 17 18 ultrafiltration data when it's available, if it's available and if the data collection burden for 19 20 single user interface facilities is addressed and we'll see what that timeline is. 21 22 The one difference that I think is

important is the 240 minute statement in the numerator that was raised by some. Ours does not include that and we have had some difficulty trying to harmonize over that particular aspect of it.

As has been pointed out, the 6 7 literature doesn't address that particular numerator statement or practical considerations 8 9 that KCQA used, but we have been working on 10 analyses looking at the 240 minute numerator 11 inclusion or numerator statement, and find that about 20 percent of the patients ---- based on 12 13 the current CROWNWeb data or recent CROWNWeb data, about 20 percent of the patients who have 14 15 high UFR rate have high UFR rate with a 240 16 minute or longer treatment time.

And if you look at associations with mortality for those patients stratified on treatment time cut at 240 minutes, the increased rate -- the increased mortality associated with high UF rate, the association is at least as strong for patients above 240 minutes as it is

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for patients below 240 minutes.

2	So if we get around, if we have the
3	opportunity to harmonize measures down the road,
4	that's going to be an important issue to talk
5	about. But other than that, those are relatively
6	small issues. Fundamentally, the two measures
7	are relatively similar.
8	Thank you.
9	CO-CHAIR CROOKS: Okay, thank you.
10	The same three people are, I believe
11	yes, excluded from consideration
12	considering this measure or voting.
13	And our discussants are Rick Kaskel
14	and Dodie Stein. Take it away Dodie.
15	DR. STEIN: According to this, it's an
16	intermediate clinical outcome intended to guard
17	against risk with rapid fluid removal, high UFR,
18	faster UFR.
19	From my own perspective, I think the
20	goal is a good one and it sounds like the
21	evidence is compelling. I have some other
22	concerns about how this thing happens at the

clinical level. 1 2 Rick? DR. KASKEL: Just to add -- and again, 3 basically, we're with this challenge that early 4 data demonstrated that a high ultrafiltration 5 rate was linked to increased mortality, increased 6 7 intradialytic hypotension as well as myocardial stunting. 8 9 So it is very important data indeed and there is some data that suggests that this is 10 mechanistic and should be evaluated. 11 12 CO-CHAIR CROOKS: Okay, Alan? 13 DR. KLIGER: Can I point out that all of those data which are interesting are 14 15 associative and not causative data. And patients who get those high 16 ultrafiltration rates, particularly those who get 17 18 long treatments and high ultrafiltration rates 19 may be the very ones at highest risk of death, 20 not because we're dialyzing them or ultrafiltering them but because they're the big 21 22 weight gainers and have cardiovascular ----

underlying substantial cardiovascular disease. 1 2 So I just think we have to be very careful interpreting those data. 3 CO-CHAIR CROOKS: Other discussion of 4 the evidence? Franklin? 5 DR. MADDUX: I'd just say that as I've 6 7 looked at the evidence on ultrafiltration rates on a per kilogram per milliliter per hour, it's 8 9 the -- it seems fairly obvious when you're below 10 ten or you're above 15. Between 13 and 15, there's still some 11 controversy, I think, in some of the articles 12 13 that I've read as to exactly where that cut point So it's a bit of a less clear zone and that is. 14 15 was one of the reasons why I thought the 16 additional time-based element to the measure had some value because it mitigated that to some 17 18 degree for these patients that you mentioned, 19 Alan, that may represent as many as 20 percent of 20 the over 13 people. There is a lot of study still to be 21 22 done in this area, it seems to me. And so we're

not at a high level of maturity, I think, on this 1 2 particular topic. So it strikes me. And then the other is simply a 3 question that I have probably for the group and 4 then for the developers would be my big concern 5 about the single measurement in this is the long 6 7 intradialytic interval and the impact that that would have on the results by using that single 8 9 measure if it happened to be on the Monday or 10 Tuesday -- typical Monday or Tuesday. And I don't know whether that bothers 11 12 anybody else or not. 13 CO-CHAIR CROOKS: That might be reserved for the specifications section then. 14 15 So the evidence is not what we'd like, 16 but it's the evidence that we have. 17 Other -- Lorien? I'm sorry, I didn't 18 see your card. 19 DR. DALRYMPLE: So I just have kind of 20 one general question for the group since we did just recently review a measure for KCQA that's 21 22 very similar except for in the assessment of

time. 1 2 Does anyone have a different assessment of evidence for this measure as 3 compared with that one? Or a different 4 interpretation of the evidence than we did for 5 the prior measure that had a similar target? 6 7 CO-CHAIR CROOKS: Okay. No? Yes, Michael? 8 9 DR. SOMERS: Except that some of the evidence in the other measure was the time-based 10 evidence. 11 So I think that would have been 12 13 considered along with the evidence for the ultrafiltration goal. So I think that's kind of 14 15 the difference between the two in my mind. 16 DR. DALRYMPLE: Did your impression change between these two measures with that --17 18 CO-CHAIR CROOKS: Mic? 19 DR. DALRYMPLE: I'm sorry. And my 20 question just was, you know, to the group. I'm just curious if you would rate the 21 22 evidence differently based on those differences?

And I'm just curious about the group's thoughts 1 2 on that since we just recently --DR. SOMERS: Well in my mind, I 3 thought the time-based evidence was stronger than 4 the UF rate evidence. And other people on my 5 workgroup said that as well. We didn't ask 6 7 everyone individually, so I don't know if there was consensus in the workgroup. 8 9 CO-CHAIR CROOKS: John? 10 DR. WAGNER: I guess I would add that 11 with the double measure, there are two patientrelated factors in the metric. 12 13 In here we have one, namely the patient's intradialytic weight gain can only be 14 15 handled in a certain way in terms of UFR. And if 16 a patient is willing to extend time to at least the four hour mark in the other metric, then 17 18 whatever intradialytic weight gain the patient 19 has falls away as an issue. 20 So in this case, we don't have that as a safety valve for the patient in any case. 21 22 CO-CHAIR CROOKS: Okay. Shall we vote

on the evidence? 1 2 MS. OGUNGBEMI: The committee is now voting on evidence for Measure 2700. The options 3 are 1 high, 2 moderate, 3 low and 4 insufficient. 4 Voting is open. 5 Could everyone try one more 6 MS. BAL: 7 time? We need one more vote. There should be 19. 8 9 Unless someone -- unless you see your 10 friend missing other than -- oh okay, then we're Never mind. It's hard to see on this 11 qood. side. 12 13 MS. OGUNGBEMI: Well, it's a gray zone measure because the results are zero votes high, 14 15 nine votes moderate, six votes low and three 16 votes insufficient. So Measure 2700 is in the 17 gray zone for evidence. 18 CO-CHAIR CROOKS: Okay. Familiar 19 territory for this group. 20 Okay, so we're going to go on to discuss the performance gap. 21 22 DR. KASKEL: I'll do it.
1	So this is CROWNWeb analysis of over
2	400,000 hemodialysis entries and it shows a ten
3	percent splay in performance between the 25th
4	percentile and the 75th percentile facilities.
5	Given the number of HG patients
6	nationally, it translates to a large patient
7	population with a potential benefit if the
8	rationale behind the measure holds.
9	There's disparity data presented that
10	looks at key facility demographics separated into
11	quintiles, all of which showed differences in
12	performance across quintiles. However, it's not
13	clear if this is biologically a basis for these
14	differences or changes that might result in care.
15	So the gap information would benefit
16	from the national measure and their suggestion
17	that there is disparity data differences.
18	CO-CHAIR CROOKS: In my interpretation
19	of the disparity data was that there was
20	statistically significant data because they have
21	so many numbers to crunch, but they may not be
22	clinically meaningful, you know, the differences

between the quintiles. 1 2 Okay, let's vote on performance gap then. 3 MS. OGUNGBEMI: The committee is now 4 voting on performance gap for Measure 2700. 5 The options are 1 high, 2 moderate, 3 low and 4 6 7 insufficient. Voting has opened. Results are zero votes high, 17 votes 8 9 moderate, one vote low and one zero votes 10 insufficient. Measure 2700 passes on performance 11 gap. CO-CHAIR CROOKS: Okay, so we can 12 13 continue on our discussion about specifications and reliability. 14 15 DR. STEIN: Yes, on the reliability, 16 84 percent variation was attributed between facility differences and 16 percent attributed 17 18 with in-facility variation. 19 Testing was performed on adults 20 hemodialysis patients at dialysis facilities over 11 patients. CROWNWeb data overall IUR was 0.84, 21

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as I said.

22

1	CO-CHAIR CROOKS: Okay. So the IUR
2	was good and we were discussing specifications a
3	while back.
4	Franklin, anything else you wanted to
5	underline or make clear?
6	DR. MADDUX: No, I think what I said
7	before is where I am. I'm still concerned about
8	the long intradialytic interval from the one
9	measurement versus several.
10	CO-CHAIR CROOKS: Okay. Other
11	concerns about the specifications or reliability
12	that you'd like to mention?
13	Okay, let's vote.
14	MS. OGUNGBEMI: The committee is now
15	voting on reliability for Measure 2700. Options
16	are 1 high, 2 moderate, 3 low and 4 insufficient.
17	Voting has opened.
18	Measure 2700 for reliability has
19	passed. The votes are zero high, 12 moderate,
20	five low and one insufficient.
21	CO-CHAIR CROOKS: Yes, 75 percent.
22	Okay, what's next? I've lost my

place. Validity.

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DR. KASKEL: So validity. The analysis provided showing that there can be a 3 clear separation in measurement performance to 4 group facilities.

Given that there was less compelling 6 7 data to show interquintile validity differences, this would need to be -- one would need to be 8 9 careful how such a construct was designed to 10 stratify centers to make sure that potentially non-significant differences in quintile 11 distribution were not part of the design. 12

13 Some units determine kilograms to be removed first then time-allowed resulting in 14 15 ml/kg per hour measure. What needs to be 16 established and controlled first is the question. What effect would standard would have on 17 18 patients' comfort -- the standard have on the 19 comfort, adherence to treatment, feasibility of 20 dialyzing patients in a typical four hour window, some units use three to three point five hours, 21 22 and the impact of staff effort with the patient

needing attention for symptoms such as cramping, 1 2 blood pressure and the costs ---- the unit costs. These are a lot of significant areas 3 here for testing. Should standard specify limits 4 on fluid removal per hour as well? And should it 5 consider mortality rate of the unit relative to 6 7 ultrafiltration? Some units may have more intradialytic 8 9 weight issues and treatment non-adherence as a 10 result of the patient mix and during the dialysis treatments would be different with the problems. 11 And what about the socioeconomic or psychosocial 12 13 issues? All of these things have to be taken into account. 14 You had some other discussion about 15 16 patient involvement or decision? Yes, I'm not sure. 17 DR. STEIN: This 18 may be feasibility, but just it takes the choice 19 out of the patients. It's not patient-centered 20 and there are a number of other issues that I'll mention under feasibility that go along with 21 22 this.

CO-CHAIR CROOKS: Okay. Let's just 1 2 stay with the validity question for the moment and then we'll -- can open up these other issues. 3 So any other questions on validity? 4 Lorien? 5 So I just wasn't sure 6 DR. DALRYMPLE: 7 if we wanted to discuss as a committee the findings from the Poisson regression on the SHR 8 9 and SMR with respect to the highest quintile. 10 There is some explanation by the developer, but the lack of graded association and 11 what other people make of that. 12 13 CO-CHAIR CROOKS: She's saying the validity testing gave negative results or --14 15 DR. DALRYMPLE: So it didn't give 16 graded results and there is some explanation of that. 17 18 So for example, quintile five, the relative risk for the ---- let me make sure I'm 19 20 doing the hospitalizations is for quintile five, 1.03, but for quintile two, 1.05, for three 1.08, 21 22 for quintile four 1.06.

So in other words, the highest rates 1 2 of UF have relatively lower hospitalization or mortality. And I think the developer's fairly 3 proposed mechanisms why that may be, you know, 4 are patients that tolerate very high UF rates 5 tend to be younger, perhaps healthier at 6 7 baseline. But I just didn't know if the 8 9 committee wanted to discuss, since this was the 10 validity testing put before us, if it influenced 11 out thoughts on UF rate and outcomes. So there's also mortality on my 12 13 document, this is page 25. I don't know if Poonam or someone could just pull up page 25 and 14 15 it's a little bit easier if you see it than speak 16 it. CO-CHAIR CROOKS: I'm one measure 17 18 behind. 19 DR. DALRYMPLE: Page 25 on my 20 worksheet, which I think includes comments. And the developers will correct me if 21 I'm wrong, but they say this is likely a 22

manifestation of selection bias relating to 1 2 healthier patients being more tolerant of higher UF rates. Facilities in the highest quintile 3 may, therefore, have greater proportions of 4 healthier patients in their panel, blunting the 5 current risk of higher UF rates. 6 7 Adjustment for this effect would require a complex analyses beyond the scope of 8 9 what is possible here, which I understand those would be fairly complex. I just didn't know if 10 this affected interpretation of --11 CO-CHAIR CROOKS: Before we go to the 12 13 developers, are there other responses? I have to say, it doesn't reassure me 14 15 that's a valid measure from this analysis. 16 Alan? 17 DR. KLIGER: Yes, great question. So 18 the alternate explanation other than what the 19 developer has is that the underlying hypothesis 20 is incorrect. The other possibility is that these 21 22 higher ultrafiltration rates don't result in

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worse outcomes, in fact. Now we don't know 1 2 because the data all are associative data and not causative data. And so, I think you're 3 observation is a very important one. 4 DR. FISCHER: Did they provide 5 anything else for validity testing other than 6 7 this? Because if this is it, then if you 8 9 once again go back to the NQF algorithms, this falls into kind of a low category in terms of 10 11 validity. But I didn't review this. 12 I don't 13 know if there's anything else in the application beyond this commenting on face validity, et 14 15 cetera. 16 CO-CHAIR CROOKS: Yes, I was in this workgroup and I share that concern that the 17 18 validity hasn't been established. 19 DR. DALRYMPLE: Can I ask just a 20 procedural question? Because our committee just, I think two measures ago, voted to pass a very 21 22 similar measure although the specifications are

different.

2 This is one value versus three values, which may be part of why there's a disconnect 3 We could argue there's a specification here. 4 difference. 5 But, Sarah, do you have insight into 6 7 when committees have this inconsistency between similar measures and how we assess validity? 8 9 MS. SAMPSEL: Well, I mean in this 10 case, you also -- I mean I assume the testing was different on the other measure. So that's the 11 other difference here. 12 13 You know, we'll still bring you back to the point, you know, now you need to vote on 14 15 what was provided here and then during public 16 comment, et cetera, you know, if the developers have additional information for your 17 18 consideration as well as through public comment have additional information for consideration, 19 20 that would be brought back to you. 21 But I mean you are correct. That's a 22 really good question because there should be

consistency in the voting. 1 2 I feel that you all did talk about on the evidence side, you know, why that you voted 3 differently on the evidence. And so, this brings 4 out why you may be voting differently on 5 validity. 6 7 CO-CHAIR CROOKS: Any other comments? Questions? 8 John? 9 DR. WAGNER: So I'm just curious, is 10 this really an insufficient or low validity outcome or is this a no? 11 CO-CHAIR CROOKS: A no validity 12 13 outcome? DR. WAGNER: Yes. 14 15 CO-CHAIR CROOKS: I guess that's your 16 choice exactly how to categorize it, but we need to do it now, so let's raise our sticks and do 17 18 our job. MS. OGUNGBEMI: The committee is now 19 20 voting on validity for Measure 2700. The options are 1 high, 2 moderate, 3 low, 4 insufficient. 21 22 Voting is open.

The results are zero votes high, four 1 2 votes moderate, eight votes low and seven votes insufficient. Measure 2700 fails on validity. 3 CO-CHAIR CROOKS: Now that's not the 4 end of consideration for validity -- oh, wait, 5 this is validity, it is, yes. 6 7 Okay, so we can stop considering this We'd like to offer a chance to give 8 measure. 9 feedback to the developers before we move on. 10 DR. DALRYMPLE: My only question would 11 be, I know in some of the prior measures where there's been inconsistent findings, measure 12 13 stewards have provided us with face validity which we have credence to. 14 So if there is a TEP or someone else 15 16 who's weighed in that could grant face validity? My comment would be to 17 DR. FISCHER: 18 look at your own data and maybe rethink 19 alternative hypotheses and explanations. 20 And maybe one of them may be the specification issue that Franklin and other 21 22 people raised, having a one-time value and maybe

that explains why in the validity testing you 1 2 have an unexpected finding that may not otherwise appear if it's specified differently. 3 CO-CHAIR CROOKS: Okay. 4 MS. WAGER: I'd like to make a 5 I think with this measure, the focus is 6 comment. 7 not, as Dodie mentioned, the patient-centered care. 8 9 When I worked on the dialysis floor, 10 we always assessed the patient individually. Their goal was individual. I think this --11 you're taking the patient out of the equation 12 13 when they are the most, I think, important person of that team at that time when they're dialyzing. 14 15 If we don't consider them or take what 16 their ideas like Dr. Wagner said, we could have I'm sorry, I just think the 17 adverse events. 18 patient should be involved in it. 19 CO-CHAIR CROOKS: Very good, thank 20 Any other comments for the developers? you. Advice? Dodie? 21 22 I continue to be concerned DR. STEIN:

about the patient and how you juggle all these 1 2 measures without the patient having any choice in the matter and how one juggles a limited time, a 3 specified time, plus the dry weight or whatever 4 the goal is with that, plus an ultrafiltration 5 rate. 6 7 And it just seems very complex and burdensome on staff as well. 8 9 CO-CHAIR CROOKS: Okay. Thank you. 10 Any other comments? 11 Okay, thank you very much. 12 DR. MESSANA: Can I ask for 13 clarification? 14 CO-CHAIR CROOKS: Yes, you may. 15 DR. MESSANA: So regarding the patient 16 participation comments, I'm having a little bit of trouble understanding how this metric is 17 18 different in that regard and that concern than 19 the metric you passed two measures ago. Thank 20 you, thanks -- that's the M word. So I'm just trying to better 21 22 understand that because I really -- you know, I

value the perspective, but I want to understand 1 2 it better. Again, I'm just one of 23. 3 MS. WAGER: CO-CHAIR CROOKS: Okay, so moving 4 forward, we are going to -- a couple of points. 5 In 20 minutes, we're going to stop for 6 7 public comments. The staff has advised me that they want to continue to work as long as we have 8 9 a quorum, which is 15. So after 3:00 if you need to go, you 10 11 need to go but we'll try to get a little -squeeze a little more work out of today. 12 13 We have a two hour call scheduled next week. 14 15 MS. BAL: Next Tuesday. 16 CO-CHAIR CROOKS: Next Tuesday. Okay. 17 Did I cover it? Okay. 18 I'm turning it over to Connie for the 19 next measure. 20 CO-CHAIR ANDERSON: All right, we're going back to Measure 0225 which is the measure 21 22 of serum phosphorus concentration. And Claudia

1	and Joel? 0255, what did I say?
2	MS. BAL: 0225.
3	CO-CHAIR ANDERSON: Oh, I'm sorry.
4	It's really hard to sit for an hour and a half
5	and keep your mouth shut. This is really unfair.
6	All right.
7	DR. DAHLERUS: Okay, so yes, this is
8	Measure 0255 and this is a process measure of
9	monthly phosphorus measurement. It was
10	originally developed in 2006 and endorsed by NQF
11	in 2007 and again in 2011.
12	A mineral bone disorder TEP was
13	convened in 2013 and among their activities was
14	reviewing the current process measure to also
15	consider expansion of the measure to include
16	serum or plasma, as well as another review of any
17	additional evidence.
18	The TEP affirmed the measure. They
19	did propose a revision to the denominator to
20	include children in the denominator feeling it
21	was important that children are assessed for a
22	monthly measurement.

And then they also wanted to ensure 1 2 that transplant patients with a delayed graft use ---- a functioning graft, but delayed graft use, 3 would still be included in the monthly assessment 4 of phosphorus feeling that it was important if 5 they were on chronic dialysis they would be 6 7 included. CO-CHAIR ANDERSON: All right, and the 8 9 discussants are Ishir and Michael. So I'll start this off. 10 DR. BHAN: So 11 just going quickly. So the evidence here, there is a 12 13 couple of sources provided, but one is the KDOQI Guidelines -- sorry, these are the KDIGO 14 15 Guidelines, that suggest for CKD stage 5D or 16 stage 5 including 5D that phosphorus be measured 17 every one to three months. 18 Then there is a whole bunch of other 19 references provided which are not summarized per 20 se, but I know from my own experience, there is a reasonable associative retrospective data on high 21 22 phosphorus levels and increased mortality, though

that's associative data so there is always limits to that.

Main comments, this is, of course, 3 focused on the -- it's a process measure, so it's 4 focused on the measurement of phosphate. 5 This data was not directly about the measurement of 6 7 phosphate, it was largely on the associations of phosphate with outcomes. Of course, if you don't 8 9 know what the phosphate is, then you wouldn't be 10 able to act on it. That said, there is a little bit of 11 The KDIGO Guidelines say one 12 discrepancy here. 13 to three months and this measure does state a monthly phosphorus, so there is a little 14 15 discrepancy of note there. 16 Michael, did you have anything to add? DR. FISCHER: I agree with all that. 17 18 I think we struggled -- and Ishir, please chime 19 in, and our other workgroup members, about 20 evidence. And this was a measure that was endorsed, I think, before and is up for 21

22 reendorsement.

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1	I think at that point, we also
2	struggled a bit I mean I'm almost of two
3	minds about process measures. On one hand,
4	they're tightly linked, obviously, to provider
5	behavior and they're infinitely measurable. On
6	the other hand, there are so many steps between
7	them and what we really care about in outcome.
8	And I think that, to me, always is a
9	struggle in terms of evidence. And I think Ishir
10	nicely pointed out, a lot of the evidence is
11	about actually phosphorus levels, not necessarily
12	the act of measuring phosphorus, and that's what
13	this is about.
14	I think the only thing I would add is,
15	this was reviewed by KDOQI, but my understanding
16	and you can correct me, is that it was without
17	grading. And I don't know what without and
18	maybe others on the committee know better than
19	me, I don't know what without grading is. Is
20	that D plus?
21	So you know, I'm not really sure how
22	to interpret that, but it certainly is not a high

,	
1	level of evidence. I think otherwise I agree
2	with all the comments and if other people from
3	the workgroup have additional recollections, it'd
4	be good to hear from them.
5	CO-CHAIR ANDERSON: Open for
6	discussion by the committee.
7	No discussion, then let's call for the
8	vote on evidence.
9	MS. OGUNGBEMI: The committee is now
10	voting on evidence for Measure 0255. The options
11	are 1 high, 2 moderate, 3 low and 4 insufficient.
12	Voting is open.
13	Results are one vote for high, 14
14	votes moderate, two votes low and four votes
15	insufficient. Measure 0255 passes on evidence.
16	CO-CHAIR ANDERSON: Moving to
17	performance gap?
18	DR. BHAN: So for performance gap
19	here, the data was generated from the 2013
20	CROWNWeb over 6,000 facilities.
21	And the key numbers here are the
22	quartiles, the 25th percentile was 86 percent,
-	

1	the 50th percentile, 92 percent and 75th, 96
2	percent. So if you look at the median 92
3	percent, that doesn't leave a whole lot of room
4	for improvement.
5	I also wondered out loud without any
6	real answers as to why people aren't having
7	phosphorus measured, but I supposed that's, you
8	know, the same issue came up with the hemoglobins
9	in the pediatric population. But we don't have
10	answers here about that.
11	So I think that was the real concern
12	that came up on our call was how much room for
13	improvement is there? Are there factors that can
14	actually be intervened upon? Is this
15	hospitalization-related issues, et cetera?
16	CO-CHAIR ANDERSON: Alan?
17	DR. KLIGER: Just to point out that a
18	patient would fail this if they missed one month.
19	Right? So if they were in the hospital or
20	somewhere else or so, it's not a surprise.
21	DR. BHAN: Although they're an
22	exclusion here. The denominator excludes

patients who have not been in the facility the entire reporting month.

Although that may be more transfer-3 related than hospitalization. So you might have 4 a valid point. It also speaks to the discrepancy of the one monthly versus between one to three 6 7 months.

DR. FISCHER: I mean I think over all, 8 9 is it fair to say I think we felt the performance gap was rather small, is that fair? I think that 10 was kind of the consensus of our working group. 11 Just so everyone has an idea what the -- I think 12 13 the working group sentiment was at the end of our conversation. 14

## CO-CHAIR ANDERSON: Frank?

16 DR. KRISHNAN: I think it's currently measured in the QIP, right? So it's small in the 17 18 QIP as well, the calcium phosphorus measurement 19 is a QIP measure today is small, the gap. 20 CO-CHAIR ANDERSON: Frank? DR. MADDUX: Could I just -- can I get 21 a clarification? 22

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So the denominator exclusion is 1 2 patients who haven't been in the facility for the entire month, so it would exclude anyone who is 3 hospitalized. Is that correct? Yes, that's the 4 way I interpreted it. 5 DR. BHAN: Can we confirm that with 6 7 the developer? So if the patient was DR. DAHLERUS: 8 9 hospitalized for the entire month, they would be 10 If they were hospitalized for a part excluded. of the month, they would not be excluded. 11 DR. MADDUX: So that isn't guite how 12 13 I read what's on here. It says exclusions are implicit in the denominator definition and 14 15 include all patients who have not been in the 16 facility the entire reporting month. DR. DAHLERUS: So the entire reporting 17 18 month is meant to be 30 calendar days. So they 19 have to --20 DR. MADDUX: So if I was out for five calendar days, I wouldn't have been there the 21 22 entire reporting month?

Right, but you have to DR. DAHLERUS: 1 2 be out of the facility, discharged from the facility for the entire 30 days. If not, then 3 you would still be included. 4 DR. MADDUX: Okay. 5 DR. DAHLERUS: And we'll confirm with 6 7 DR. MADDUX: It's a little -- it's not 8 9 quite clear --10 DR. DAHLERUS: Right, we'll confirm. 11 DR. MADDUX: -- the way it's written. 12 DR. DAHLERUS: Agreed. 13 CO-CHAIR ANDERSON: Any further discussion? All right, let's vote on performance 14 15 gap. 16 MS. OGUNGBEMI: The committee is now voting on performance gap for Measure 0255. 17 The 18 options are 1 high, 2 moderate, 3 low and 4 19 insufficient. Voting is open. 20 Results are zero votes high, six votes moderate, 14 votes low and one vote insufficient. 21 22 Measure 0255 fails on performance gap.

So, I muted myself, but MS. SAMPSEL: 1 2 this is ---- for consistency sake, this would be very similar to other ones where ---- that you 3 considered for reserve status. 4 CO-CHAIR CROOKS: Right, right, right. 5 Thank you. 6 7 CO-CHAIR ANDERSON: I guess we're going to do a hand vote. Would the committee 8 9 like to consider making this measure ----10 bringing to reserve status? 11 DR. KRISHNAN: Just a question for Sarah, though. This is not currently a fielded 12 13 metric, right? It's a component of -- calcium phosphorus is a fielded metric, but phosphorus 14 itself is not. 15 16 DR. DAHLERUS: It is a current 17 measure, yes. 18 DR. KRISHNAN: Calcium and phosphorus 19 is a current measure. Phosphorus itself? 20 DR. DAHLERUS: No. This is the serum phosphorus is a separate current NQF endorsed 21 22 measure.

DR. FISCHER: Right, and again, this 1 2 was endorsed originally in 2007, re-endorsed in 2012. 3 CO-CHAIR ANDERSON: Would the 4 committee like to vote this for reserve status? 5 All right, hands if you would like this to move 6 7 to reserve status? All right, we'll continue with 8 9 reliability. 10 DR. BHAN: So for reliability, I'm 11 just going to jump to our comments. The specifications, there was some 12 13 confusion about inclusion of transplant patients with an active allograft. There was also concern 14 15 about inclusion of pediatric patients since the 16 evidence cited was from adults. I want to hear from our pediatric colleagues about that, but 17 18 there was some concern that exclusion criteria would thus need to be modified. 19 20 And the same discussion we already had about the effects of hospitalization specifically 21 22 being an issue that people are hospitalized for

part of the month would still be included. 1 2 The reliability testing -- let me just pull that up, looked at IURs that were 0.95 to 3 0.97. Most of the variation was attributed to 4 between facility variation and it looked overall 5 pretty reliable. 6 7 So to summarize, some concerns about the specifications that we discussed. 8 9 CO-CHAIR ANDERSON: Michael, any 10 addition? 11 DR. FISCHER: Yes, I agree with Ishir. I think we had questions for the developer about 12 13 the items he mentioned. I think we already discussed the 14 15 hospitalization thing, which I found confusing. 16 I interpreted it the way Franklin did when I read this. And then the other two issues were 17 18 pediatric patients and transplant patients with 19 functioning allografts. 20 CO-CHAIR ANDERSON: I think one of the other questions at least under the reliability in 21 22 the specifications was about the home dialysis

patient population and I'd like to ask the 1 2 developers if they've come up with what are you going to do -- are you excluding the home 3 patients? Are they included? 4 DR. DAHLERUS: I believe the home 5 patients are included. 6 7 CO-CHAIR ANDERSON: They are included? DR. DAHLERUS: I believe -- this is 8 9 something that I'll have to check with our analyst to make sure that they were included in 10 11 the analysis, in the calculation. 12 CO-CHAIR ANDERSON: Okay. For both 13 hemo and PD? DR. DAHLERUS: 14 Yes. 15 CO-CHAIR ANDERSON: Okay. 16 DR. DAHLERUS: So we do indicate that home dialysis patients are included as I'm 17 18 looking here at my notes. So I'm not sure why 19 that was a question to begin with. 20 DR. FISCHER: And this is including adult and pediatric patients? Just to confirm. 21 22 DR. DAHLERUS: Yes, it is. And that's

a change from the measure that was originally 1 2 endorsed in 2007 and again in 2011. The 2013 MBD TEP wanted to add 3 children to the denominator in order -- that they 4 would be assessed on a monthly -- for the monthly 5 measurement as well. 6 7 DR. FISCHER: Okay, thanks. CO-CHAIR ANDERSON: Any other comments 8 9 on reliability? All right, let's vote. MS. OGUNGBEMI: The committee is now 10 11 voting on reliability for Measure 0255. The options are 1 high, 2 moderate, 3 low and 4 12 13 insufficient. Voting is open. Results are one vote high, 14 votes 14 15 moderate, three votes low and zero votes 16 insufficient. Measure 0255 passes on 17 reliability. 18 CO-CHAIR ANDERSON: All right, moving 19 on to validity? 20 So validity here, we talked DR. BHAN: about the issue of the where this is coming from, 21 22 primarily data around phosphorus and outcomes

rather than testing per se.

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2	The validity testing here looked at
3	Poisson regression models to determine the
4	association with mortality and came up with a ten
5	percent a relative risk of mortality of 0.98
6	for a ten percent increase in the performance
7	score.
8	I guess the issue there is how many
9	facilities can have a ten percent increase in the
10	performance score? And even if they achieve
11	that, there's relatively small association with
12	mortality here.
13	And I think there was this also a
14	question about the validity given the issue of
15	patient absences.
16	CO-CHAIR ANDERSON: Michael? Any
17	further discussion on the part of the committee?
18	All right, we will be voting on
19	validity.
20	MS. OGUNGBEMI: The committee is now
21	voting on validity for Measure 0255. Options are
22	1 high, 2 moderate, 3 low and 4 insufficient.

voting is open.

2	Results are one vote high, 16 votes
3	moderate, two votes low and zero votes
4	insufficient. Measure 0255 passes on validity.
5	CO-CHAIR ANDERSON: We're going to
6	pause here for a minute. It's time for public
7	comment. So we'll take the measure up after the
8	public comment time.
9	OPERATOR: Okay. At this time, if you
10	would like to make a comment, please press star
11	then the number one.
12	There are no public comments at this
13	time.
14	CO-CHAIR ANDERSON: All right, so
15	let's move on. Feasibility?
16	DR. BHAN: So in general, our group
17	felt that this is feasible.
18	It's already part of the QIP and data
19	is routinely generated during the process of
20	care. So it looked pretty feasible.
21	CO-CHAIR ANDERSON: Michael?
22	DR. FISCHER: Let's vote.

CO-CHAIR ANDERSON: All right, let's 1 2 vote. MS. OGUNGBEMI: Committee is now 3 voting on feasibility for Measure 0255. Options 4 are 1 high, 2 moderate, 3 low, 4 insufficient. 5 Voting is open. 6 7 Results are 12 votes high, seven votes moderate, zero low and zero insufficient. 8 9 Measure 0255 passes on feasibility. 10 CO-CHAIR ANDERSON: All right, moving 11 on to usability and use? It's used in the QIP. 12 DR. BHAN: 13 There's not any obvious unintended consequences 14 publically reported. It seems useable. 15 CO-CHAIR ANDERSON: Alan? 16 DR. KLIGER: So in terms of usability, I want to ask the pediatricians their opinion. 17 18 Monthly blood draws from your home dialysis 19 patients? 20 DR. SOMERS: Since almost all of our home dialysis patients are PD patients, they're 21 22 seen by us on a monthly basis anyway. I don't

1	think that's a big issue in the pediatric world.
2	DR. KASKEL: I concur. They come in
3	and even if they're a small infant, we need to
4	get we get the labs.
5	CO-CHAIR ANDERSON: All right, ready
6	to vote on usability and use.
7	MS. OGUNGBEMI: The committee is now
8	voting on usability and use for Measure 0255.
9	Options are 1 high, 2 moderate, 3 low and 4
10	insufficient. Voting is open.
11	Results are 11 votes high, eight votes
12	moderate, zero votes low and zero votes
13	insufficient. Measure 0255 passes on usability
14	and use.
15	CO-CHAIR ANDERSON: All right. We are
16	any other comments or issues to discuss before
17	we vote on usability for endorsement and for
18	reserve status? So let's vote.
19	MS. OGUNGBEMI: Committee is now
20	voting on potential for reserve status for
21	Measure 0255. Options are 1 yes, 2 no. Voting
22	is open.

,	
1	Results are unanimous, 19 votes yes,
2	zero no for potential for reserve status for
3	Measure 0255.
4	CO-CHAIR ANDERSON: We still have a
5	quorum and so we would like to continue if the
6	committee is willing to continue on until we lose
7	quorum until at least 3:00.
8	Okay, thanks. Next measure is 1425,
9	Joe and Joel?
10	DR. MESSANA: For the sake of time, I
11	will limit my comments on this measure to
12	clarification of a typographical error that was -
13	or a question that was raised about a
14	potential typographical error in 1(b)(2) and
15	1(b)(4).
16	In the workgroup, a question came out
17	was it 30 facilities or 13 facilities. The
18	answer is 30 facilities. I went back and looked
19	at all the analyses supporting the submission and
20	the 13 is a typographical error. It's supposed
21	to be 30 facilities.
22	I will leave it at that since you're
	•

pressed for time.

2 CO-CHAIR ANDERSON: All right. Andy 3 and Debra?

DR. NARVA: Yes, this is measurement of nPCR for pediatric hemodialysis patients and it's the percentage of patient months of pediatric in-center hemodialysis patients with documented monthly PCR measurements.

9 It's a level analysis is the facility, the evidence is based on KDOQI Guidelines. 10 Α general nutrition guideline from 2006 and the 11 2008 KDOQI Guideline on Nutrition in Children 12 13 with CKD, which recommended nutritional status and growth of all children with CKDs two to five 14 15 including 5B should be evaluated on a periodic 16 That was given a Grade A strong evidence. basis. They provided data from 2014 17 18 literature view which was supportive, and in 19 addition to that, there's some evidence that in

20 adolescence, PRC levels were an earlier and more 21 sensitive marker of -- than serum albumin of 22 malnutrition.

1	Despite this, there's not a vast
2	amount of data to support this measure and a lot
3	of this is inferred from benefit in adults.
4	CO-CHAIR ANDERSON: Debra, any
5	additional? Open for discussion to the
6	committee.
7	All right, let's call for the vote on
8	evidence.
9	MS. OGUNGBEMI: The committee is now
10	voting on evidence for Measure 1425. Options are
11	1 high, 2 moderate, 3 low and 4 insufficient.
12	Voting is open.
13	Results are two votes high, 16 votes
14	moderate, zero votes low and one vote
15	insufficient. Measure 1425 passes on evidence.
16	CO-CHAIR ANDERSON: Performance gap?
17	DR. NARVA: Okay. Nutrition is
18	obviously an incredibly important indicator in
19	all dialysis patients, particularly those that
20	are growing or trying to grow.
21	2013 data from CROWNWeb showed a mean
22	score of 80.4 percent and that included 455 in-
center hemodialysis pediatric patients from 30 1 2 dialysis facilities with at least 11 eligible pediatric patients. So there appears to be a 3 4 gap. CO-CHAIR ANDERSON: Debra? 5 Any further discussion on the part of the committee? 6 7 All right, we are ready to vote for performance gap. 8 9 MS. OGUNGBEMI: The committee is now 10 voting on performance gap for Measure 1425. The options are 1 high, 2 moderate, 3 low and 4 11 12 insufficient. Voting is open. 13 Results are two votes high, 17 votes moderate, zero votes low and zero votes 14 15 insufficient. Measure 1425 passes on performance 16 gap. 17 CO-CHAIR ANDERSON: Moving on to --18 DR. NARVA: **Reliability?** 19 CO-CHAIR ANDERSON: Yes. 20 Okay. This measure is DR. NARVA: meant to be collected and calculated through 21 22 It seems to be fairly clearly CROWNWeb.

1

delineated.

2 There was a comment that the exceptions to the denominator were confusing, but 3 that wasn't from me and I'm not sure what the 4 5 commenter meant exactly. It's a process measure and it's not 6 7 stratified or risk-adjusted. There is in reliability testing, is 8 9 that a separate -- I can't remember. Did we vote 10 on that separate? Okay. Together, yes. 11 Well, from the 2013 CROWNWeb data, the overall IUR was 0.985, which indicates about 98.5 12 13 percent of the variation is between facility differences. 14 15 CO-CHAIR ANDERSON: Debra? Any 16 discussion on the part of the committee? DR. NARVA: Oh, there was one issue 17 18 with validity, which is that --19 CO-CHAIR CROOKS: We're not doing 20 validity yet. CO-CHAIR ANDERSON: We're on 21 22 reliability.

DR. NARVA: Oh, sorry. Yes, okay. 1 2 CO-CHAIR ANDERSON: You're okay, yes. DR. NARVA: I'm rushing it. 3 CO-CHAIR CROOKS: I just wanted to ask 4 the pediatric nephrologists, this calls for the 5 measurement to be done monthly. Is that really 6 7 what you recommend? Things can change that fast? DR. ZARITSKY: That's what we do, yes. 8 9 CO-CHAIR CROOKS: Okay, so you agree 10 with that? Okay. 11 DR. ZARITSKY: That's the same data 12 that's a degenerate of Kt/V so it's just added 13 information. CO-CHAIR CROOKS: It doesn't add a 14 15 further burden to the patient really? 16 DR. ZARITSKY: No, I mean utility is another story, but measuring that once a month's 17 18 not a problem. 19 CO-CHAIR ANDERSON: All right, ready 20 to vote on reliability. MS. OGUNGBEMI: The committee is 21 22 voting on reliability for Measure 1425. The

options are 1 high, 2 moderate, 3 low and 4 1 2 insufficient. Voting is open. Results are two votes high, 17 votes 3 moderate, zero low and zero insufficient. 4 Measure 1425 passes on reliability. 5 CO-CHAIR ANDERSON: Moving on to 6 7 validity? The evidence seems to DR. NARVA: 8 9 support the measure is consistent except among the facilities with 11 eligible pediatric 10 patients with recorded PCR values. 11 Facilities with a hundred percent 12 13 reporting had a mean serum albumin of 377 while facilities with less than a hundred percent had 14 15 higher albumins, which, you know, on the face of 16 it, appears to suggest that the evidence is not consistent with -- the measure's not consistent 17 18 with the evidence, but it appears likely or leads 19 -- speculation is that the more frequent PCR 20 determinations were done in the patients who had poorer nutritional status, hence the bias. 21 22 CO-CHAIR ANDERSON: Debra? Any

comments, Debra? 1 2 Michael? DR. SOMERS: You also have the TEP 3 weighing in with the thumbs up? 4 DR. NARVA: 5 Yes. CO-CHAIR ANDERSON: Any further 6 7 discussion on the part of the committee? All right, ready to vote on validity. 8 9 MS. OGUNGBEMI: Committee is voting on 10 validity for Measure 1425. Options are 1 high, 2 moderate, 3 low and 4 insufficient. Voting is 11 12 open. 13 Results are zero votes high, 19 votes moderate, zero low and zero insufficient. 14 15 Measure 1425 passes on validity. 16 CO-CHAIR ANDERSON: Moving on to feasibility? 17 18 DR. NARVA: The data source is 19 CROWNWeb, it seems to be quite feasible. 20 CO-CHAIR ANDERSON: All right, let's go for the vote. 21 22 MS. OGUNGBEMI: Committee is voting on

feasibility. Options are 1 high, 2 moderate, 3 1 2 low, 4 insufficient. This is for Measure 1425, voting is open. 3 Results are 15 votes high, four votes 4 moderate, zero votes low and zero votes 5 insufficient. Measure 1425 passes on 6 7 feasibility. CO-CHAIR ANDERSON: All right, moving 8 9 on to use -- usability and use. DR. NARVA: So this measure is not 10 11 currently in use although it's an existing 12 measure. 13 I actually would ask the developers or the potential users why it's not being used? 14 15 DR. ANDRESS: So this measure faces 16 many of the same issues that we discussed for the pediatric -- the measurement of hemoglobin for 17 18 pediatric patients. 19 I think it's -- you know, it's 20 available. It's certainly there for use outside of CMS and in the meantime, we're trying to 21 22 resolve how best to address quality measurement

in a critical yet very small patient population 1 2 in the dialysis community. So this is a measure that I think is 3 still in the running for consideration in public 4 reporting and other uses. We simply haven't 5 managed to conclude the conversation at CMS. 6 7 The pediatric caucus want DR. NARVA: to weigh in on this? 8 9 CO-CHAIR CROOKS: So it's usable, but 10 not in use in a sense? You know, it's usable, 11 somebody could the data from you, the report or the results, but no one's working with you to use 12 13 it yet, but it's usable? DR. ANDRESS: I think that would 14 15 summarize it correctly, yes. CO-CHAIR CROOKS: 16 Okav. 17 CO-CHAIR ANDERSON: All right, ready 18 to vote for usability and use. MS. OGUNGBEMI: The committee is now 19 20 voting on usability and use for Measure 1425. The options are 1 high, 2 moderate, 3 low and 4 21 22 insufficient. Voting is open.

Results are four votes high, 15 votes 1 2 moderate, zero votes low and zero votes insufficient. Measure 1425 passes on usability 3 and use. 4 CO-CHAIR ANDERSON: All right. 5 Oh, one more time. 6 7 Any further discussion on the measure before we vote for suitability to recommend 8 9 endorsement? All right, shall we go ahead and 10 vote? MS. OGUNGBEMI: The committee is now 11 voting on Measure 1425's overall suitability for 12 13 endorsement. Options are 1 yes, 2 no. Voting is 14 open. 15 I still need two votes. 16 Results are 19 votes yes, zero votes Measure 1425 passes on its overall 17 no. 18 suitability for endorsement. CO-CHAIR ANDERSON: I think we are at 19 20 the conclusion. The last two measures we're going to have to take up next week as well as the 21 22 related and competing measures that we didn't get

I'd like to thank everyone for the past two 1 to. 2 days, their time, their expertise and their engagement in the process. It's been a great two 3 days. Thank you very much. 4 CO-CHAIR CROOKS: Thank you very much. 5 MS. BAL: Before everybody leaves 6 7 though, there are some last minute timelines and such. So as a reminder, we're meeting next week 8 9 on Tuesday 1:00 to 3:00. Please come ready to 10 discuss the last two measures, 1460 and 1662. 11 Also, on behalf of the staff, we do want to thank the committee. It's been a 12 13 pleasure working with you for the past two days and we really enjoyed how involved all of you 14 15 Thank you. are. So the meeting's department will be 16 sending an email soon after this meeting to give 17 18 you reimbursement forms and as Sarah said 19 earlier, the hotel costs have been reimbursed 20 already. (Whereupon, the above-entitled matter 21 22 went off the record at 2:47 p.m.)

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## <u>CERTIFICATE</u>

This is to certify that the foregoing transcript

In the matter of: Renal Standing Committee

Before: NOF

Date: 05-07-2015

Place: Washington, D.C.

was duly recorded and accurately transcribed under my direction; further, that said transcript is a true and accurate record of the proceedings.

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Court Reporter

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