

May 12, 2017

Laurence Wilson
Director, Chronic Care Policy Group
Centers for Medicare and Medicaid Services

Re: Innovation implementation in the ESRD Prospective Payment System

Dear Mr. Wilson:

The American Society of Nephrology (ASN) represents nearly 17,000 physicians, scientists, nurses, and other health professionals dedicated to treating and studying kidney diseases to improve the lives of people with kidney diseases. ASN is a not-for-profit organization dedicated to promoting excellence in kidney care, including efforts to foster the development and delivery of innovative new products to patients with kidney diseases.

The society appreciates CMS' ongoing efforts to improve the quality and efficiency of dialysis care in the Medicare End-Stage Renal Disease (ESRD) Program. Last year, CMS established a transitional drug add-on payment to onboard innovative new therapies into the ESRD bundle. ASN commends this important step, which will be crucial to ensuring a predictable pathway for delivering novel treatments to people with kidney failure.

As new products are now becoming available that meet the criteria to be added to the bundle, ASN encourages CMS to provide implementation guidance with sufficient lead time to allow for prescribers, facilities, and pharmacies to design policies and procedures so as to minimize patient impact and maximize patient benefit. Providing timely guidance regarding implementation instructions is an important factor in ensuring that more innovative new products are available to patients with kidney failure in the future.

Thank you for your consideration of this important issue. ASN would be pleased to discuss these comments with CMS if it would be helpful and stands ready to assist in any way; please contact ASN Director of Policy and Government Affairs Rachel Meyer at (202) 640-4659 or at rmeyer@asn-online.org.

Sincerely,



Eleanor D. Lederer, MD, FASN
President