

BY ELECTRONIC SUBMISSION VIA P4QM.ORG

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Partnership for Quality Measurement

RE: Delay in Progression of Chronic Kidney Disease (CKD) Measure (3753)

AstraZeneca is a global, science-led biopharmaceutical company that focuses on the discovery, development and commercialization of prescription medicines, primarily for the treatment of diseases in three therapy areas – Oncology, Cardiovascular, Renal & Metabolism (CVRM) and Respiratory & Immunology. We also work to solve challenges for rare disease patients through our subsidiary Alexion. AstraZeneca operates in over 100 countries and its innovative medicines are used by millions of patients worldwide.

As a company committed to transforming Chronic Kidney Disease prevention, earlier detection and management, AstraZeneca appreciates this opportunity to comment on endorsement of the Delay in Progression of Chronic Kidney Disease (CKD) (#3753) measure.

AstraZeneca **supports the development and implementation of this Delay in Progression of Chronic Kidney Disease (#3753) measure.** Further refinement and eventual adoption of this measure into value-based programs will represent an important step towards earlier detection. However, we must keep in mind that patients are actually 5-10X more likely to have premature death from CKD than to progression to ESKD⁴. Therefore, in addition to these outcomes measure, optimization of guideline directed CKD treatment and updated CKD screening guidelines must remain a top priority to ultimately achieve prevention of progression to ESRD.

CKD is one of the most under-recognized public health crisis in the United States – as few as approximately 10% of adults with CKD are diagnosed.^{1,2} CKD and its progression to ESRD presents serious consequences for the patients, caregivers, the environment, and the healthcare system as a whole in the United States:

- Even with availability of medications that can slow down the progression of CKD and evidence-based clinical practice guidelines, more than 750,000 US adults are living with ESKD, and over 70% are receiving dialysis regularly¹
- Patients with ESRD must manage direct costs of medical procedures, diagnostics, laboratory tests, medications, vaccinations, healthcare provider visits, hospitalizations, dialysis, transportation to and from appointments as well as an inability to work or engage in many normal activities due to these factors.
- In addition to the clinical burden from CKD and its progression to ESKD, there is also considerable economic burden from healthcare resource utilization; in the United States, combined CKD and ESKD expenditures exceed \$100 billion annually^{2,3}
- The average annual expenditures for hemodialysis is over \$100,000 per patient with federal spending on ESRD patients reaching over \$50 billion a year. Patient out-of-pocket costs alone were estimated at \$3.5 billion in 2017, further demonstrating the significant burden on patients.
- Dialysis facilities have a high environmental effect because the treatment requires large amounts of energy, water and supplies. The delivery of kidney care, particularly

hemodialysis treatment, can result in substantial environmental impact through greenhouse emissions, natural resources depletion and waste generation. During 2020, emissions from a single hemodialysis treatment were 58.9 kg carbon dioxide equivalents, according to data published in the Journal of the American Society of Nephrology.

References:

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2. United States Renal Data System. USRDS 2022 annual data report: Chronic kidney disease: chapter 6 healthcare expenditures for persons with CKD. National Institutes of Health, National Institute of Diabetes and Digestive and Kidney Diseases; Bethesda, MD; 2022. Accessed April 6, 2023. <https://adr.usrds.org/2022>
3. United States Renal Data System. USRDS 2022 annual data report: End Stage Renal Disease: chapter 9 healthcare expenditures for persons with ESRD. National Institutes of Health, National Institute of Diabetes and Digestive and Kidney Diseases; Bethesda, MD; 2022: chapter 9. Accessed April 27, 2023. <https://adr.usrds.org/2022>
4. Kidney disease: the basics. National Kidney Foundation. Accessed April 18, 2023. <https://www.kidney.org/news/newsroom/factsheets/KidneyDiseaseBasics>