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Endorsement and Maintenance Committee
Partnership for Quality Measurement
PQMSupport@battelle.org

Re: Support for Endorsement of the Rate of Annual Kidney Health Evaluation Among Adults with Diabetes and/or Hypertension (CBEID 5611e)

Dear Members of the Partnership for Quality Measurement, Endorsement and Maintenance Committee,

Vertex Pharmaceuticals is pleased to submit this letter in support of endorsement of the measure, [Rate of Annual Kidney Health Evaluation Among Adults with Diabetes and/or Hypertension \(CBEID 5611e\)](#), developed by the National Kidney Foundation (NKF).

Vertex is a global biotechnology company focused on developing transformative medicines for serious diseases, including serious rare and genetic kidney diseases. We have a strong interest in improving the care of patients with kidney disease, including through policies and quality measurement frameworks that support earlier detection and evidence-based treatment.

CKD is Underdiagnosed And Patients with Risk Factors Should be Screened

[Chronic kidney disease \(CKD\) affects an estimated 35 million Americans](#), yet approximately [90% are unaware of their condition](#). CKD is frequently asymptomatic in its early stages, meaning that without routine testing, patients and clinicians only learn of its presence through proactive screening. This diagnostic gap is a contributing factor that makes CKD the ninth leading cause of death in the United States.

Diabetes and hypertension are the most common risk factors for CKD. Yet testing rates remain below what clinical guidelines recommend even for patients at increased risk. Data from the U.S. Renal Data System (USRDS) indicate that [less than half of Medicare fee-for-service beneficiaries with diabetes are screened, and just under 60 percent with Medicare Advantage receive an annual kidney health evaluation](#). Vertex strongly believes that CKD is one of the most preventable or

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manageable chronic diseases if identified early. Prevented or delayed progression of CKD would not only improve overall population health but reduce the total cost of care.

CBEID 5611e Addresses a Critical Gap in Quality Measurement

The existing NKF kidney health evaluation measure is limited to patients with diabetes. CBEID 5611e would expand that measure by adding patients with hypertension, while maintaining the same evidence-based standard. The connection between CKD and hypertension is clear--nearly 90% of Medicare fee-for-service beneficiaries with CKD had hypertension.

This expansion of the measure is grounded in clinical evidence. Annual kidney health evaluation for patients with diabetes and/or hypertension is recommended by [KDIGO](#), the [American Diabetes Association](#), the [American Heart Association](#), the [American College of Cardiology](#), and the [National Kidney Foundation](#), among others. Together, eGFR and uACR enable earlier detection, more accurate CKD staging, and timely initiation of therapies that can slow disease progression and reduce cardiovascular risk. Recent evidence further supports the value of improved CKD testing: [better disease management in CKD Stages 3 and 4 has been associated with as much as a 40% reduction in inpatient hospitalization and a 30% reduction in emergency department visits](#).

Endorsement Would Accelerate Broader Adoption

PQM endorsement of CBEID 5611e would support broader use of this measure across value-based care programs, including MIPS, MIPS Value Pathways (MVP), the Medicare Advantage Star Ratings, HEDIS, and Medicaid quality programs such as the Kidney Care Choices model as well as accountable care models like MSPP and LEAD. It would also be a strong signal to clinicians and health systems that annual kidney health evaluation for patients with diabetes and/or hypertension is an evidence-based standard of care.

For patients with IgA nephropathy, APOL1-mediated kidney disease, and other serious kidney conditions, earlier identification of CKD creates an opportunity for earlier and more effective interventions, including lifestyle modification, risk factor management, and emerging therapies. Vertex is committed to a future in which kidney disease is caught early, managed well, and, where possible, treated with innovative therapies. CBEID 5611e is an important step toward that future.

For these reasons, Vertex strongly supports endorsement of CBEID 5611e. We appreciate the Partnership for Quality Measurement's commitment to advancing evidence-based, patient-



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centered quality measurement, and we welcome the opportunity to engage further on this measure or related kidney health initiatives.

Please feel free to contact me at Samantha_Ventimiglia@vrtx.com with any questions.

Respectfully submitted,

Samantha Ventimiglia
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