



April 3, 2015

Michael Rocco, MD, MSCE, FNKF  
Chair, Kidney Disease Outcomes Quality Initiative  
National Kidney Foundation  
30 East 33rd Street  
New York, NY 10016

**Re: National Kidney Foundation Kidney Disease Outcomes Quality Initiative (NKF KDOQI)  
2015 Update**

Dear Dr. Rocco:

The Alliance for Home Dialysis is a coalition of kidney dialysis stakeholders representing patients, clinicians, providers, and industry. We have come together to promote activities and policies to facilitate treatment choice in dialysis care while addressing systemic barriers that limit access for patients and their families to the many benefits of home dialysis.

As a member of the Alliance's Steering Committee we recognize the National Kidney Foundation's longstanding dedication to ensuring that patients have access to all treatment modalities, including those in the home. NKF has consistently stood with the rest of the Alliance in supporting payment and other policies that ensure equal access to all modalities for patients.

However, clinical practice guidelines such as the National Kidney Foundation Kidney Disease Outcomes Quality Initiative (NKF KDOQI) also play an important role in protecting patient choice by ensuring equal access to valuable clinical information. Some members of the Alliance have raised concerns regarding specific recommendations in the most recent proposed update to the NKF KDOQI that could potentially discourage providers from recommending some home modalities. The Alliance encourages that these recommendations be revised to better reflect the clinical benefits offered by home treatment.

In particular, Alliance members believe that the update does not adequately reflect the demonstrated benefits of more frequent home hemodialysis as it is most commonly practiced in the United States. More frequent hemodialysis, particularly at home, is an important treatment option that offers significant clinical benefits. For instance, studies have

demonstrated that more frequent hemodialysis results in faster recovery time after treatment with fewer side effects;<sup>1</sup> improved cardiac status<sup>2</sup> and survival rates;<sup>3</sup> and increased likelihood for transplantation<sup>4</sup> and opportunity for rehabilitation.<sup>5</sup> Despite these proven clinical advantages, the Alliance is concerned that under the guidelines suggested in this update patients would not receive consultation regarding the potential benefits they could see with home treatment.

We encourage NKF to continue to work with the Alliance, and its members, to ensure that the final update reflects the full breadth of the academic literature regarding home hemodialysis, including the demonstrated clinical benefits for suitable patients. While NKF has worked with the Alliance in the past to work for more consistent payment of more frequent home hemodialysis, we worry that without guidelines that help practitioners place suitable patients in the home, the benefits of such payment policies would reach far fewer patients than are medically suitable for such treatments.

The Alliance appreciates your consideration of this request, and would be happy to work with NKF on any future revisions. Please feel free to contact Elizabeth Lee at 202-466-4929 if you have any questions or would like additional information.

Sincerely,

A handwritten signature in black ink that reads "Stephanie Silverman". The signature is written in a cursive style with a long horizontal flourish extending to the right.

Stephanie Silverman  
Executive Director

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<sup>1</sup> Heidenheim AP, Muirhead N, Moist L, et al. Patient Quality of Life on Quotidian Hemodialysis. Am J Kidney Dis. 2003 Jul; 42(1 Suppl):36-41.

<sup>2</sup> Culleton, B et al. Effect of Frequent NHD vs.CHD on Left Ventricular Mass and Quality of Life. JAMA 2007;11

<sup>3</sup> Pauley, R.P. et al. Survival among nocturnal home haemodialysis patients compared to kidney transplant recipients. Nephrol Dial Transplant. 2009;24;2915-19

<sup>4</sup> Pauley, R.P. Survival comparison between intensive hemodialysis and transplantation in the context of the existing literature surrounding nocturnal and short-daily hemodialysis. Nephrol Dial Transplant. 2013 28: 44-47.

<sup>5</sup> Blagg, Christopher. "It's Time to Look at Home Hemodialysis in a New Light." Hemodialysis Horizons: Patient Safety & Approaches to Reducing Errors. (2006): 22- 28. Web. 12 Apr 2012. <http://www.aami.org/publications/HH/Home.Blagg.pdf>.



**Signing Members**

**American Association of Kidney Patients**

**American Kidney Fund**

**American Nephrology Nurses Association**

**American Society of Pediatric Nephrology**

**Baxter**

**The Cleveland Clinic**

**DEKA Research and Development**

**Dialysis Clinic, Inc.**

**Dialysis Patient Citizens**

**Greenfield Health Systems**

**Home Dialyzors United**

**Hortense and Louis Rubin Dialysis Center, Inc.**

**Medical Education Institute**

**N.A. Chapter International Society for Peritoneal Dialysis**

**National Renal Administrators Association**

**Northwest Kidney Centers**

**NxStage Medical**

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**Renal Physicians Association**

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**Southwest Kidney Institute**

**TNT Moborg International Ltd.**