



March 20, 2020

Jean Moody-Williams
Acting Director
Center for Clinical Standards and Quality
Centers for Medicare and Medicaid (CMS)
7500 Security Boulevard
Baltimore, MD 21244

Re: Concerns about CMS Adult Elective Surgery and Procedures Recommendations during response to COVID-19

Dear Director Moody-Williams:

The Alliance for Home Dialysis is a coalition of kidney dialysis stakeholders, representing patients, clinicians, providers, and industry that works to promote policies that facilitate treatment choice for individuals in need of dialysis, and to address systemic barriers that limit access to the many benefits of home dialysis. These issues are particularly urgent today, not only given how many Americans are currently living with ESRD and depend on dialysis for survival, but also given the high correlation between COVID-19 and kidney damage.¹

Peritoneal Dialysis (PD) is the most common dialysis modality that permits patients to dialyze in their own homes. Most, if not all, ESRD patients are immunocompromised, which means that their ability to socially distance during the COVID-19 pandemic is of the utmost importance. Home dialysis makes social distancing much easier as it allows patients to avoid multiple clinic visits per week because they conduct their treatments in their own homes. Therefore, at this time of national response to COVID-19, it is imperative that we maintain the ability for patients to initiate dialysis at home, including through the PD modality.

PD initiation requires the surgical insertion of a catheter. Without a catheter, the patient is not able to perform PD and must instead utilize hemodialysis, most likely in-center, or less commonly, at home.

While we fully understand the reasoning behind CMS's recommendations² on cancelling elective surgeries, and support the conservation of critical resources for the COVID-19 response, we are

¹ [https://www.thelancet.com/journals/lancet/article/PIIS0140-6736\(20\)30558-4/fulltext](https://www.thelancet.com/journals/lancet/article/PIIS0140-6736(20)30558-4/fulltext)

² <https://www.cms.gov/files/document/31820-cms-adult-elective-surgery-and-procedures-recommendations.pdf>

concerned that this guidance could negatively impact PD catheter placement. While we do not believe that PD catheter placement clearly fits into any of the tiers outlined in the recommendations, we are concerned that it could be interpreted to be a “low acuity surgery,” and therefore, be postponed. We are concerned that this potential interpretation could have the unintended consequence of suggesting that PD catheter placement is actually elective, which it is not.

Therefore, the Alliance respectfully urges CMS to clarify that PD catheter placement is not an elective procedure in order to ensure that dialysis patients will continue to have access to this important therapy.

Thank you for your consideration of this request. We would be happy to provide any additional information you need. Should you have any questions feel free to reach out to Michelle Seger at michelle@homedialysisalliance.org.

Sincerely,

A handwritten signature in black ink, appearing to read "Stephanie Silverman", with a long horizontal flourish extending to the right.

Stephanie Silverman
Executive Director
Alliance for Home Dialysis



Alliance for Home Dialysis 2020 Members

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