

# ESRD Mineral and Bone Disorder Measure Development Technical Expert Panel

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## ESRD Mineral and Bone Disorder Measure Development

The Centers for Medicare & Medicaid Services (CMS) has contracted with the University of Michigan Kidney Epidemiology and Cost Center (UM-KECC) to develop facility-level measures in the area of mineral and bone disorder. The contract number is 75FCMC18D0041, task order number 75FCMC23F0001. As part of its measure development process, the University of Michigan Kidney Epidemiology and Cost Center convenes groups of stakeholders who contribute direction and thoughtful input to the measure developer during measure development and maintenance.

UM-KECC has been tasked by CMS to develop dialysis facility quality measures that evaluate the effectiveness of mineral and bone disorder (MBD) management as part of the treatment of end-stage renal disease (ESRD) among US dialysis facilities.

### Technical Expert Panel Objectives

The TEP will use existing data and their expert opinion to formulate recommendations to UM-KECC regarding the development of a draft measure that addresses potentially important quality gaps in mineral and bone disorder management. Recommended measures should be evidence based, scientifically acceptable (reliable and valid), feasible, and usable by CMS, providers, and the public. Specifically, the TEP will engage in discussion to develop potential quality measures that could incentivize the best practice of MBD management given the lack of high quality evidence to guide specific therapies (e.g. nutritional, pharmacologic, surgical). TEP input will be sought regarding potential sources of data such as the EQRS system and Medicare claims that may provide useful information about MBD diagnoses, diagnostic testing, medication use, and procedures. The TEP should also consider whether risk adjustment strategies will be needed and if any exclusion criteria should be considered so that the measure is usable from both patients' and providers' perspectives.

### Technical Expert Panel Composition

A public call for nominations opened on November 3<sup>rd</sup>, 2023 and closed on November 17<sup>th</sup>, 2023. Nominations were sought from individuals with the following areas of expertise or experiential perspectives:

- Nephrologist providers (physicians, advanced practice providers), nephrology trained social workers, dieticians, and dialysis facility nursing staff
- ESRD bone and mineral disorder experts
- Consumer/Patient/Family/Care Partner perspective
- Performance measurement experts
- Quality improvement experts
- Purchaser perspective
- Healthcare disparities experts

The following individuals were selected to serve on the TEP:

Name and Credentials	Organizational Affiliation, City, State	Conflicts of Interest Disclosed
Geoffrey Block, MD <i>(TEP Co-chair)</i> Nephrologist	US Renal Care Golden, CO	Former Director at Ardelyx, Inc with equity in company
Kamyar Kalantar-Zadeh, MD <i>(TEP Co-chair)</i> Nephrologist	LA County Department of Health Services Harbor- UCLA Torrance, CA	None Reported
Deborah Benner, MA, RDN, CSR Registered Dietician	DaVita Inc, Yorba Linda, CA	None Reported
Paul T. Conway, BA Chair, Policy and Global Affairs Patient Advocate	American Association of Kidney Patients Tampa, FL	None Reported
Dinesh K. Chatoth, MD Nephrologist Associate Chief Medical Officer	Fresenius Medical Care Suwanee, GA	Employee and Stakeholder of Fresenius Medical Care
Barbara Fox, MS, MPH Patient Advocate	Yuba City, CA	None Reported
Edward V. Hickey President, AAKP Chair	American Association of Kidney Patients(AAKP) Tampa, FL	None Reported
Klemens Meyer, MD Nephrologist	Tufts Medical Center and Dialysis Clinic, Inc Boston, MA	Develops MBD decision support tools for DCI, but no financial interest
Adrian Miller Patient Advocate	Vancouver, WA	None Reported
Lisa Modica, RD, BS Registered Dietician	Rogosin Institute Fort Lee, NJ	None Reported
Evan R. Norfolk, MD, MBA Nephrologist System Director for Nephrology	Geisinger Health System Danville, PA	Fresenius Pharmacy and Therapeutics Committee
Sherri Shivley Patient Advocate	Hamden, CT	None Reported
Francesca Tentori, MD, MS Nephrologist VP for Outcomes Research	DaVita, Inc Portland, TN	Employee of DaVita
<b><i>Contractor Staff</i></b>		
Jonathan Segal, MD, MS	<i>Professor of Internal Medicine, Division of Nephrology, University of Michigan, Kidney Epidemiology and Cost Center</i>	None Reported

Name and Credentials	Organizational Affiliation, City, State	Conflicts of Interest Disclosed
Joseph Messana, MD,	<i>Professor of Internal Medicine</i> , Division of Nephrology, University of Michigan, Kidney Epidemiology and Cost Center.	None Reported
Ananda Sen, PhD	<i>Professor of Biostatistics and Research Professor</i> , University of Michigan, School of Public Health	None Reported
Eric Young, MD, MS	<i>Senior Research Scientist</i> Arbor Research	None Reported
Shu Chen, BS, MS	<i>Senior Analyst</i> , University of Michigan, Kidney Epidemiology and Cost Center	None Reported
Quinton Hazen, MPH	<i>Intermediate Analyst</i> , University of Michigan, Kidney Epidemiology and Cost Center	None Reported
Lan Tong, MS	<i>Lead Analyst</i> , University of Michigan, Kidney Epidemiology and Cost Center	None Reported
Jennifer Sardone, BA, PMP	<i>Senior Lead Project Manager</i> , University of Michigan, Kidney Epidemiology and Cost Center	None Reported
Jaclyn George, BA	<i>Project Intermediate Manager</i> , University of Michigan, Kidney Epidemiology and Cost Center	None Reported
Mimi Dalaly, MPH	<i>Project Intermediate Manager</i> , University of Michigan, Kidney Epidemiology and Cost Center	None Reported

## 1. Introduction

This report summarizes the discussions and recommendations of the ESRD Mineral and Bone Disorder TEP meetings convened on January 29<sup>th</sup>, February 23<sup>rd</sup>, and February 26<sup>th</sup> of 2024. All meetings were public and held virtually via zoom video-conference. The TEP provided advice and expert input on the development of potential mineral and bone disorder quality measures. The discussions were informed by an annotated bibliography of relevant literature compiled by UM-KECC, and data provided by UM-KECC.

## 2. Preliminary Activities

### 2.1 Information Gathering

Prior to the in-person TEP meeting, UM-KECC provided TEP members with an Environmental Scan that include an annotated bibliography of published literature (Appendix B) related to ESRD Mineral and Bone Disorders. The time period for this review focused on new publications since the 2017 KDIGO Bone and Mineral Guideline Update. The Annotated Bibliography included primary studies as well as meta-analyses and was organized into three categories:

- Treatment of Parathyroid Hormone (PTH) abnormalities
- Phosphorus lowering strategies
- Outcomes associated with calcium and phosphorus abnormalities

UM\_KECC also provided a summary of relevant clinical guideline updates since the last TEP was held in 2013, as well as a list of related measures that are currently developed/in use. This information was reviewed during the second TEP meeting (slides located in the appendix).

## 2.2 TEP Charter

The ESRD Mineral and Bone Disorder TEP Charter (Appendix A) was distributed to the TEP members for review prior to the first meeting. At the first TEP meeting, Dr. Segal reviewed key elements of the charter.

The role of the TEP was outlined and the following responsibilities were highlighted:

- Review evidence to determine the basis of support for the proposed measure
- Recommending draft measure specifications
- Assisting in completing the necessary documentation forms to support submission of the measures to CMS for review, and to the CBE for endorsement
- As needed, TEP members may be asked to provide input to UM-KECC as they prepare responses to CBE and public comments

There were no questions or concerns raised by TEP members about the TEP Charter.

## 3. Background for Mineral and Bone Disorder

A high level overview of mineral and bone disorder was provided by Dr. Eric Young. Dr. Young provided a breakdown on bone health, and how kidney failure is associated with changes in mineral metabolism as kidney disease progresses (including vitamin D, phosphorus, and PTH). Dr. Young reviewed the mineral metabolism regulatory pathways, and the importance of mineral and bone disease management including control of phosphorus, calcium, and PTH in promotion of bone health. Treatment strategies were reviewed as well including treatments for elevated phosphorus with diet and phosphorus binders. PTH management with Vitamin D, and calcimimetics was discussed as well. This information was intended to be a framework for the TEP as they began their discussions surrounding mineral and bone disorder quality measurement.

### 3.1 Overview of the 2017 KDIGO Guidelines

TEP Co-Chair Dr. Geoffrey Block provided the TEP with an overview of the guidelines developed by KDIGO for diagnosis, evaluation, prevention and treatment of CKD-MBD. Dr. Block reminded the TEP that the group is charged with designing a measure around the understanding that MBD is a systemic disorder and that the group should consider the measureable patient level outcomes that are the result of the these abnormalities.

Dr. Block focused on several points in the KDIGO guidelines for the TEP discussion. Recommendations made in the guidelines should be approached in the context of abnormalities, the severities of those abnormalities, and whether there are any interventions being done to treat those abnormalities. He referred to guideline 3.1.4- *therapeutic decisions should be based on trends and not on single lab values, and should take into account all MBD assessments*. In addition, KDIGO recommended the use of DEXA assessment of bone mineral density if low or declining results would impact treatment decisions since DEXA had the ability to predict fractures in all stages of CKD. He also noted the importance of assessing the patient for the presence or absence of vascular calcification as part of the diagnosis of CKD-MBD and cardiovascular risk stratification. Treatment of MBD should be based on serial assessment of the abnormalities and considered together and not separately. KDIGO recommended that phosphorus should be lowered to the normal range, and hypercalcemia should be avoided (compared to the prior recommendation that calcium be maintained in the normal range). Dr. Block drew the TEP's attention specifically to the KDIGO guideline 4.1.6 stating that for *patients receiving phosphate lowering therapy there should be a restriction on the dose of calcium-based phosphate binders*. Dr. Block challenged the TEP to consider the pending inclusion of phosphate lowering therapy in the ESRD payment bundle and the potential unintended consequences of measure development affecting care delivery. He also noted that for patients on dialysis, providing more dialysis is an appropriate therapy for the management of elevated phosphorus.

The KDIGO workgroup, in guideline 4.1.8, suggested *limiting dietary phosphate intake in the treatment of hyperphosphatemia and that it is reasonable to consider the phosphate source (e.g. animal, vegetable, additives)*. This guideline was called out for the importance of how providers approach dietary phosphate restriction while maintaining adequate nutrition. Dr. Block pointed out one of the most controversial guidelines is 4.2, regarding the treatment of abnormal PTH levels. He noted that maintaining PTH within 2-9 times the upper limit of normal was not changed from 2017 to 2019, but that marked changes within that target range should prompt a change in therapy (vitamin D analogues, calcitriol, or calcimimetics). He noted that 4.2.5 is also important to think about, regarding patients who fail to respond to medical therapy since, in these cases, KDIGO recommends parathyroidectomy. Dr. Block also highlighted the importance of thinking about calcium, phosphorus, and PTH abnormalities in combination, rather than in silos, as it relates to cardiovascular risk.

One TEP member asked a question regarding the recommendation from KDIGO about asymptomatic hypocalcemia, since attributing a symptom to hypocalcemia can be difficult. It was suggested the TEP consider this as the discussions on upcoming calls continues given the increased use of calcimimetics. Dr. Block mentioned the EVOLVE study to the TEP members. The KDIGO workgroup was reluctant to exclude the potential benefits of calcimimetics that was observed in this study based on the lag-censored results, but was conflicted because calcimimetics at the time were not uniformly available around the world.

Dr. Block mentioned the pediatric recommendations in the KDIGO guidelines. Children need to be approached differently than adults. 4.1.3 states that serum calcium should be approached in an age appropriate range. He noted that if we want to consider children, then we need to consider separating pediatrics from adults for recommendations.

One TEP member asked Dr. Block to specify what additional evidence has come to light over the past 5-10 years that the group should consider. Dr. Block referenced the TEP charter, noting that the evidence we do have is not at a high level at this moment. As part of the TEP discussion, the group needs to decide the following:

- Is there any new evidence that have arose in the past five years that can influence how we think about quality care delivery?
- Is what exists today - the Hypercalcemia measure – something MBD TEP would endorse now in today's environment and is this the right measure for today and where we will be years from now?

Dr. Kalantar-Zadeh informed the TEP that there haven't been a lot of new discoveries over the past several years, but to remind the TEP that they are there to ensure the quality measures used are as current as possible, and to identify any unintended consequences. The TEP needs to review what has been done in the past, and to see how we can improve upon what already exists.

One TEP member asked about bundled payment, and a reference to the environment we are operating in, and implementation. This TEP members asked what the TEP should be looking at regarding new evidence, new science and what benefits patients, or CMS policy and what should be incorporated into the bundle payment. Dr. Block confirmed that the TEP is not charged with discussing payment policy, but is here to recommend to UM KECC what is the best quality measure to ensure patients are receiving quality care.

### 3.2 Previous MBD Technical Expert Panels

Dr. Joseph Messana presented the TEP with a summary of the prior Mineral and Bone Disorder Technical Expert Panels. Dr. Messana reminded the TEP that a lot has changed since the first TEP that took place in 2006. The context of developing measures back then did not include CROWNWeb/EQRS or the ESRD QIP. There was Dialysis Facility Compare, but there were much fewer measures during that time and they were more focused on mortality, adequacy and vascular access reporting.

- 2007-2008 ESRB MBD TEP measure recommendations for patients on dialysis:
  - Measurement of Serum Phosphorus Concentration: Phosphorus should be measured monthly.
  - Evaluation of Serum Phosphorus Concentration: Phosphorus should be maintained between 3.5 – 5.5 mg/dl.
  - Measurement of Serum Calcium Concentration: Calcium should be measured monthly.
  - Evaluation of Serum Calcium Concentration: Calcium should be maintained  $\leq$  ULN.

Note: of the four measures presented to the Consensus Body Endorsement group, only measurement of serum phosphorus and calcium were endorsed.

- 2010 ESRD MBD TEPs measure recommendations:
  - Upper Limit for Total Uncorrected Serum Calcium: 3 month rolling average of total serum calcium  $>10.2$  mg/dl
  - Lower Limit for Serum Phosphorus: 3 month rolling average of serum phosphorus  $< 2.5$  mg/dl
  - Process Measure for PTH: Monthly measurement of PTH

Note: only the Calcium measure was endorsed.

- 2013 ESRD MBD TEP process measure recommendations:
  - Measurement of Uncorrected Serum Calcium monthly
  - Measurement of Serum Phosphorus monthly
  - Process Measurement of Plasma PTH measured at least once every 3 months.
  - Percentage of Patients with Dietary Counseling at least once in a 6 month period.
  - Additional recommendations
    - Hypercalcemia Measure - all TEP members unanimously recommended to leave the measure unchanged and to retain the current specification for uncorrected calcium. This is the current version of the measure as endorsed by NQF (#1454).
    - Serum versus Plasma Lab Samples - All TEP members voted and unanimously recommended to keep the measure unchanged (serum calcium and phosphorus values rather than plasma).
    - Bone Biopsy Measure Development The majority of the TEP members (eight out of nine) recommended that a quality measure for bone biopsies not be developed at this time due to insufficient evidence

### 3.3 MBD Quality Measures Endorsement Overview

Dr. Segal gave an overview of the existing Mineral and Bone Disorder measures, which include a measurement of phosphorus concentration and hypercalcemia.

NQF#	Title	Steward	Status Date	Status	QIP (Calendar Yr)
0570	CKD: Monitoring Phosphorus	IMS Health	5/8/2012	Endorsement Removed	
0574	CKD: Monitoring Calcium	IMS Health	5/8/2012	Endorsement Removed	
0255	Measurement of Phosphorus Concentration	CMS	10/2/15	Endorsed with Reserve Status	2012 2017 – Reporting 2019 – Removed

NQF#	Title	Steward	Status Date	Status	QIP (Calendar Yr)
1454	Proportion of Patients with Hypercalcemia	CMS	8/16/11 10/2/15	Initial Endorsement  Endorsed with Reserve Status	2014 – Clinical 2023 – Reporting

Dr. Segal also explained that the Partnership for Quality Measurement (PQM) recently conducted a Measure Set Review of the ESRD QIP Program. The recommendation of the group was to retain the Hypercalcemia measure in the QIP, but encouraged developers to “thoughtfully consider” alternative measures.

## 4. Overview of Historical MBD Data and Literature Review

### 4.1 Historical MBD Data

To kick off the second TEP meeting, Dr. Kalantar-Zadeh provided the TEP with a background of the history of various treatments for CKD-MBD, from the 1970’s to present day. Dr. Kalantar-Zadeh gave an overview of the literature supporting phosphorous and calcium levels from different measure guidelines, and reviewed the relationship between mortality and serum phosphorus, serum calcium in dialysis patients. More details regarding the information presented by Dr. Kalantar-Zadeh can be found in the slides in Appendix C.

Dr. Kalantar-Zadeh concluded the presentation by saying that MBD markers are related to survival in epidemiologic studies of dialysis patients. Causal Inference should be with the utmost caution given the observational nature of many of the studies presented.

### 4.2. Overview of MBD Literature Review

Dr. Block introduced the TEP to the literature review completed by UM-KECC and gave a detailed review of selected articles. Dr. Block described a DOPPS study that evaluated the phosphate Area Under the Curve (AUC) over a 6-month period. He noted that higher AUC levels (i.e., with worse phosphorus control) were strongly associated with increased mortality, in particular cardiovascular mortality, in both hemodialysis and peritoneal dialysis patients. He mentioned a meta-analysis that reported some phosphate lowering agents were associated with lower mortality and hospitalization. However, he noted that how the phosphorus is lowered may be important as some strategies may have unintended consequences (e.g. aluminum as a binder). Dr. Block explained that phosphate binders in particular have huge impact on quality of patient’s life in terms of pill burden, side effects, and adversarial relationship with care team. The TEP was reminded that patient quality of life was an important consideration to keep in mind as the discussion progressed.

The EVOLVE study, and secondary analyses of that study, was discussed. Older patients randomized to cinacalcet had a significant reduction in the cardiovascular and mortality endpoints. Cinacalcet was also noted to reduce the incidence of Calcific Uremic Arteriopathy as well as bone fractures. It was noted that the comparison group in that study received active Vitamin D therapy. Dr. Block touched on parathyroidectomy and how it has increased in recent years, noting that the procedure is associated with improvement in mortality and cardiovascular outcomes. He described a study noting the inter-relationship between calcium, phosphorus and PTH and indicated that this highest risk is in patients with a high PTH and either a high calcium or high phosphorus. Dr. Block concluded with a facility-level analysis that found

facilities with a higher proportion of two or more of the three parameters out of range had higher rates of cardiovascular events and death.

## 6. MBD Quality Measure Concepts

### 6.1 PQM Evidence Criteria

Dr. Segal presented the PQM Evidence Criteria and noted that the criteria states that there should be a relationship between the healthcare process and the desired outcome.

- a. For Process/ Intermediate Outcome Measures: Demonstrated association between the measure focus and a material health outcome
- b. For Outcome measures: There is a demonstrated rationale for considering the measure focus, which is a material health outcome

He encouraged the TEP to keep these requirements in mind as they discuss possible measure development.

### 6.2 TEP Measure Concept Discussion

Following the literature review, the TEP had an open discussion surrounding possible measure concepts. The following summarizes the topics that were discussed.

#### **Area Under the Curve (AUC) phosphorus**

This measure concept was raised since it offers a more defined approach than looking at multiple labs (see below) and encompasses a longer time frame. There was discussion about how easy or difficult it would be to explain AUC phosphorus to patients and there was discussion that most patients understand that there is variability in the result from month to month. The longer time frame may also reduce the tendency to repeat the lab test multiple times in a month to try and reach the target. The group considered whether there is there a conceptual alternative to AUC that is easier to interpret (e.g. quarterly average or 6 month average). One member nominated AUC Phos >2 (corresponding to a 6 month average phosphorus >6.5 mg/dl) as an intermediate outcome measure. Additional discussion about what the ULN value should be as part of the AUC threshold will be needed. One potential advantage of a longer term measure may help with patient engagement. However, concern was raised that a phosphorus measure could have the unintended consequence of impaired nutrition based on the way facilities counseled patients to lower phosphate intake.

#### **Hyperphosphatemia (AUC phosphorus or other trend) and not on a phosphate binder**

The broader notion of medication utilization or medication use based on a critical lab threshold was discussed. TEP members raised concern about use of lower cost alternatives (e.g. calcium-based binders) or no prescription altogether being potentially incentivized by upcoming PPS system changes. There are also difficulties with how to accurately measure medication use (ordered, dispensed, or taken).

#### **PTH measurement (at some frequency)**

There was at least minor interest in exploring whether a PTH process measure might be useful. The group noted that if a PTH metric is considered, timing of co-existent therapy (i.e. calcimimetics) and or blood draw schedules may need to be considered. Variation in assays was brought up as a limitation. Uncertainty of optimal frequency of measurement was brought up as an issue.

#### **Hyperparathyroidism without evidence for either medical or surgical treatment**

The TEP discussed issues related to physician vs. facility accountability, access to qualified surgeons that may be limited in some areas, and proportion of patients that would be impacted by the measure.

### Overtreatment of hyperparathyroidism

This measure would capture patients who have low PTH levels but remain on medication to suppress PTH.

### Facility Phenotype: 2 of the 3 (Ca/Phos/PTH) above threshold.

This measure would categorize patients into high-risk categories and/or facility-level data to identify those facilities with poorer outcomes associated with MBD results. A TEP member encouraged the group to keep unintended consequences of any measure definition in mind (e.g. ordering more frequent lab tests than what is clinically indicated). TEP members discussed some of the technical differences between a patient-level and facility-level analyses. A TEP member raised a concern about social determinants of health and that any facility level metric may be impacted by patient access to healthy food. Questions were also raised about realities of implementation of a metric that relies on multiple lab values in combination.

### Patient-reported outcome related to MBD

There was interest in a potential patient reported outcome related to MBD, but it was acknowledged that the development timeline for such a measure means it's likely beyond the scope of this TEP.

### Alkaline phosphatase

There was generally low interest in a measure in this area.

## 7. MBD Measure Concepts

Dr. Segal began the third TEP meeting by summarizing a set of four of potential measures that have been generated by the TEP discussion thus far.

1. Elevated Phosphorus
  - a. AUC>2 Or other chronic measurement corresponding to a 6 month average phosphorus value > 6.5 or
  - b. Elevated phosphorus and not on a binder with chronic phosphorus elevation paired with medication use
2. PTH Measures
  - a. PTH above some threshold without evidence of treatment (either with medication or parathyroidectomy) or
  - b. Overtreatment of PTH: Low PTH and concurrent medication use
3. Facility phenotype with 2 of 3 (Ca/PO4/PTH) above threshold
4. Patient-reported outcome

Dr. Segal proposed to the TEP to take a vote on which domains the TEP should continue to discuss in order to be more focused on details and sorting out the measure. Dr. Segal noted that the TEP will not be voting on a patient-reported outcome measure; the TEP will discuss that idea at the end of the measure discussion, since it requires long term development. A google poll was sent to all TEP members at the meeting via email, asking them to respond yes or no to the following questions:

1. Should the TEP continue discussion and development of a phosphorus-based measure?
2. Should the TEP continue discussion and development of a PTH-based measure?
3. Should the TEP continue discussion and development of a facility phenotype measure (2 of 3 out of range for Ca/PO4/PTH)?

Dr. Messina confirmed that the TEP can weigh in on all three measures, and Dr. Segal informed the TEP that we would need a 60% consensus in order to move forward with a measure concept. Dr. Kalantar-Zadeh asked if calcium has been removed consideration. Dr. Segal explained that we do have the current hypercalcemia measure, and that the TEP should hold off on a formal vote on the hypercalcemia measure

because it is currently in use. If the TEP cannot reach consensus on a potential measure then we can circle back and focus on hypercalcemia. TEP members should make no assumptions regarding the status of the hypercalcemia measure moving forward.

## 7.1 Voting Results

The TEP voting results were revealed, and approximately 75% of TEP members in attendance were in favor of a phosphorus-based measure, 37.5% were in favor of a PTH-based measure, and 60% were in favor of a facility phenotype measure.

## 7.2. Discussion

Dr. Segal began the discussion with the phosphorus-based measure. Dr. Segal asked the TEP what new evidence has come to light since the last in-depth phosphorus discussion (2013 TEP). Dr. Block started the conversation by explaining that he was on one of the previous TEPS and there are three differences now compared to the prior TEP: (1) at the time they did not consider a phosphorous based measure because it was considered in the light of a target, which they did not think was appropriate, (2); they had not considered a measure of *chronic* phosphorus elevation and (3) there was a lack of supporting literature that discussed the relationship of chronically elevated phosphorus levels and the specific outcomes that MBD is meant to address. In addition, TEP members noted that we have a better understanding of MBD physiology, and new innovations in technology and in patients being more informed.

Other TEP members commented that the change over the past decade has been more modest, but that the current measure is not satisfactory, we need to have some MBD measure, and setting a more lenient standard moving forward was reasonable. In relation to calcium and PTH, phosphorus is probably the easiest area to move the needle in terms of a quality measure.

The TEP then discussed how best to evaluate a chronically elevated phosphorus. There was clarification that if only one phosphorus value is obtained per month, then the phosphorus AUC will be the same at the time-averaged phosphorus. A question was raised regarding if patients will be able to meaningfully understand the 6 month average phosphorus concept and whether this was an actionable item. Other TEP members noted that they do think patients will understand, as long as it was explained well enough by their provider. A comment was made that the real indicator of quality should be the impact on the patient and that facilities, providers and advocacy groups will need to be able to educate their patients on the measure.

TEP members discussed the relationship between hyperphosphatemia and good nutrition and the concern that control of phosphorus should not come at the expense of impairing nutrition. Some TEP members voiced concern about using the AUC methodology and there was discussion about alternative approaches using a time-averaged mean phosphorus or months out of target for phosphorus. One TEP member shared his concerns with the TEP regarding patients becoming stigmatized and being blamed for their phosphorous levels. A very conservative phosphorous percentage above 7 mg/dl (similar to what is done in the VA healthcare system) to ensure this is a patient centered approach and the TEP needs to be careful that the measure does not cause unintended consequences and harm for the dialysis patients. Specifically, it was noted that phosphorus levels are heavily influenced by nutrition and diet, which could obscure its significance as a marker for MBD and a phosphorus measure could have the unintended consequence of leading to malnutrition depending on the approach of providers. The metric should be conservative enough for physicians and patients. A TEP member noted that there are numerous studies beyond the ones presented to the TEP using a threshold of 6.5 mg/dl and MBD outcomes and that the group should not be in the position to create their own threshold that is not supported by the literature. Other TEP members indicated that a more lenient standard could be used for a quality metric.

Discussion then turned to crafting a measure description for the proportion of patients with a 6 month average phosphorus above a threshold of 6.5 mg/dl. TEP members raised the question of whether 5.5 mg/dl should be used based on when risk begins to increase for MBD outcomes, but others indicated that the goal for this measure is to pick a threshold for which there is less harm for patients, keeping in mind the relationships between diet and phosphorous. There was interest in being more conservative with the 6.5 target. A TEP member requested we use the first phosphorous value of the month vs. the last value to prevent providers from continuing to draw the lab until they get the number they want.

Some TEP members were unsure if 6 months (average exposure) is the correct time to propose. One TEP member raised a concern around how many patients would be included in a measure with a longer time frame (e.g. due to death, transfer, etc.) Dr. Segal informed the TEP that most intermediate outcome measure require patients to be on dialysis for 90 days, and if the patient leaves the facility or passes away, they are excluded. A TEP member asked what the groups comfort level was regarding this smaller population and if we should decrease the length to 4 months. A 3 month time frame was also proposed and a TEP member agreed that 3 months would be easier to manage from an operational stand point. Several TEP members expressed their concern with shortening to 3 months.

Dr. Segal proposed allowing UM-KECC to conduct some initial analyses that might be able to guide the decision making with regards to 3 or 6 months. Dr. Segal proposed including 3-6 months in the draft specifications as a placeholder pending analyses to evaluate the number of patient months that would be included based on the time frame selected. He explained other commonly used criteria: patient has to be in facility for 90 days, and the patient is excluded from measure if patient leaves the facility or dies within the month. The measure is not restricted based on insurance type (includes both Medicare and non-Medicare patients).

Dr. Messina noted the hypercalcemia measure does exclude pediatric patients, and Dr. Segal asked TEP members to weigh in on whether pediatrics should also be excluded. Dr. Block is reluctant to include pediatric patients in the measure, and the TEP agreed. Dr. Segal noted patients in hospice are typically excluded, and the TEP agreed to exclude them for this measure as well.

Dr. Segal asked the TEP about possible risk adjustments and Dr. Block asked for examples of patients characteristics that could risk adjusted. Dr. Messina shared potential factors for risk adjustments such as area deprivation index, residing in skilled nursing facility, insurance status such as Medicare/commercial/duel eligible, and race. Dr. Messina asked the TEP if any of these factors, or any additional factors, should be added to minimize the bias in this measure. A TEP member asked if there are populations that are not served well and that may be undertreated for MBD conditions. One TEP member mentioned that the community in which the patient lives in and what access the patient has to certain foods will impact their phosphorous levels. The TEP is willing to consider ADI as a risk adjustment; UM KECC can look into this particular risk adjustment further and report their findings back to the TEP.

Dr. Messina asked whether KECC should also create a parallel measure with AUC and have the TEP vote on how to proceed. TEP members did not think this would be necessary and agreed that just looking at the proportion of patients with an average phosphorus about 6.5 mg/dl would be sufficient. Measure specifications were discussed and draft specifications are listed below.

## 8. Measure Specifications

### 8.1 Phosphorus Measure

**Measure Description:** Proportion of patient with (3 or 6) month average phosphorus above > 6.5 mg/dl

**Numerator:** Number of patients with 3 or 6 month average phosphorus above 6.5

**Denominator:** Patients in the facility for 3 or 6 months

**Risk Adjustment:** explore ADI, possibly other factors

**Exclusion Criteria:** Patients with < 90 days ESRD; AKI patients, pediatric patients, hospice patients

## 8.2 Facility Phenotype

**Measure Description:** Facility Phenotype: proportion of patients in the facility with 2 of 3 above threshold (consider PTH  $11x > \text{ULN}$ ). 4 month average of 3 variables.

Additional specifications for this measure were not decided upon by the TEP at this time. Although there was support for the measure concept, particularly if it identified patients that might otherwise be overlooked, one TEP member noted that there is limited evidence linking simultaneous abnormalities in calcium, phosphorus and PTH with MBD outcomes. One of the challenges discussed for a composite measure is that for CBE consideration, each of the component measures typically needs to be able to stand on its own and there needs to be evidence for the composite measure itself. In addition, there was also a concern for a relatively small number of patient that would be in the numerator and thus limited opportunity to improve quality. Lastly, there was concern on reaching consensus on a PTH threshold. A TEP member asked if this could be made into a process measure. There was a recommendation that future TEPs consider a composite such as this one for development. It would also need to factor in 3-6 months of lab values. Dr. Segal informed the TEP that the UM-KECC team will look to see if there is something additional we can add to this particular measure specification.

## 8.3 Patient Choice/Patient Reported Outcomes

Dr. Segal asked the TEP if they have thoughts for future measure development with regards to a patient reported outcome and how to account for patient choice in their treatment options while accounting for shared decision-making. A TEP member mentioned it's more than just a voice of a patient, but it's their choice of treatment. The treatment should be defined as high quality, which hopefully include treatments that align with a patients aspirations to feel better, to work, to travel and to live their lives. There are quantitative factors that need to be explained to the patient so they understand the effects of treatment decisions and how it impacts their overall health. Qualitative factors include increased dietary discretion and how this impacts patients socially (e.g. going out to eat). Will the patient be freer in their diet so they are able to do more things in their lives, and do they have a voice and choice in their treatments? Are the treatments covered by CMS?

One TEP member noted that many providers believe that whatever provides maximum survival would be considered the best care, but that if we allowed patients to opt out of a phosphorus measure that many would even if it wasn't the best course of action for them in the long run.

A TEP member mentioned the idea of patient "pill burden" and considering getting to a lower phosphorus value with the least number of medications to do so. The TEP member also indicated "pill burden" related to phosphorous management had been a point discussed in a 2023 FDA Advisory Committee meeting that had approved a new phosphorous pill therapy for dialysis patients that reduced the need for phosphate binders. Another TEP member mentioned that patients need to be asked if they are being engaged in conversations as part of their treatment plans and that more dialog needs to take place between patients and providers. Patients shouldn't need to make a choice between long-term outcomes and pursuing their aspirations. A TEP member added that we should focus on ways to get patients access to low phosphorus nutrition options so it might be easier for them to control with less medication.

A TEP member asked if there should be a maximum number of binders that a patient should be prescribed to control phosphorus. An unintended consequence could be that the number of binders per meal will go up as providers strive to meet the measure goals. Another TEP member suggested that considering the number of phosphate binders that a patient takes in a day should be considered. There was discussion that phosphate lowering therapies are scheduled to enter the bundled payment system in 2025, and if not delayed by current bipartisan action in the House of Representatives, this could have a significant impact on patient choice given that providers would have to balance the cost of treatment provided with the level of reimbursement. Thus, a patient reported outcome in this scenario would be critical to have in place. Finally, another TEP member added that providers need to consider their role in managing phosphorus as it relates to the amount of dialysis prescribed, and concurrent medications that may make phosphorus control worse.

## 9. Next Steps

Dr. Segal presented the TEP with next steps. A fourth TEP meeting was scheduled for March 6<sup>th</sup> 2024. Dr. Segal mentioned that UM KECC will do some ground work from the discussions, and likely cancel the March 6<sup>th</sup> meeting and then schedule a follow up TEP meeting with all TEP members.

## 10. Public Comments

No public comments were received at any of the three TEP meetings.

## 11. Appendices

- A. TEP Charter
- B. TEP meeting slide presentations