

CY 2025 ESRD PPS Final Rule

ESRD QIP Finalized Proposals

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Acronyms



BSI	Bloodstream Infection	mTPS	Minimum Total Performance Score
CMS	Centers for Medicare & Medicaid Services	NHSN	National Healthcare Safety Network
COVID-19	Coronavirus Disease of 2019	PD	Peritoneal Dialysis
CY	Calendar Year	PPPW	Percentage of Prevalent Patient Waitlisted
DE	Dialysis Event	PPS	Prospective Payment System
EQRS	ESRD Quality Reporting System	PY	Payment Year
ESRD	End-Stage Renal Disease	QIP	Quality Incentive Program
HCP	Healthcare Personnel	SDOH	Social Drivers of Health
HD	Hemodialysis	SHR	Standardized Hospitalization Ratio
ICH CAHPS	In-Center Hemodialysis Consumer Assessment of Healthcare Providers and Systems	SRR	Standardized Readmission Ratio
MedRec	Medication Reconciliation	STrR	Standardized Transfusion Ratio
MIPPA	Medicare Improvements for Patients and Providers Act	TPS	Total Performance Score

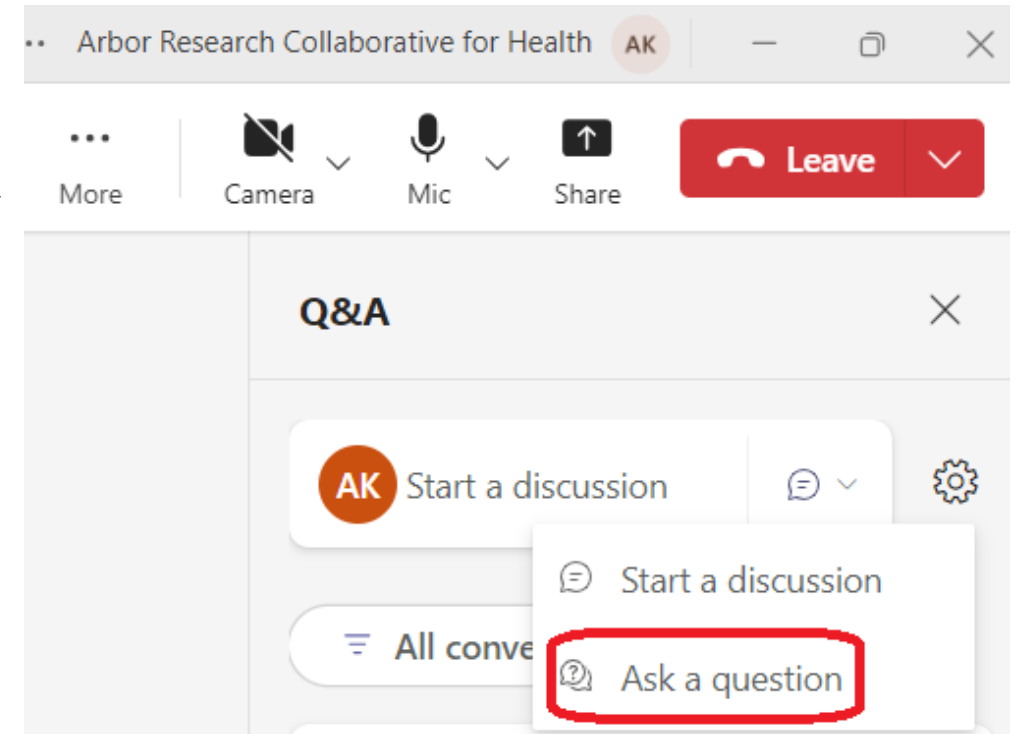
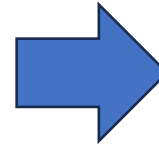
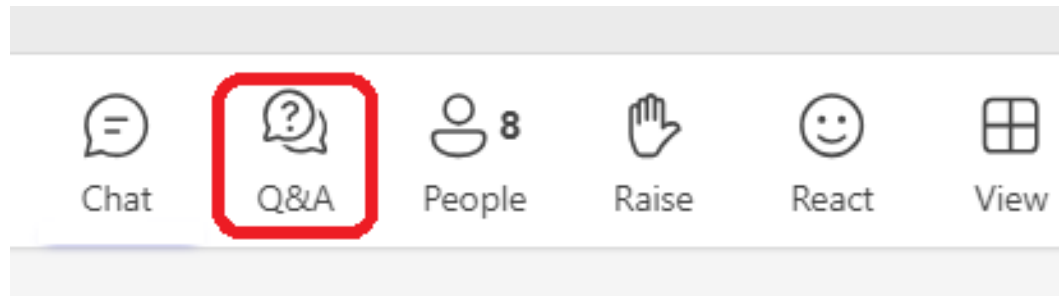
Agenda



Topic	Speaker
Welcome & How to Submit Questions	Alissa Kapke
Objectives & Guidance	Alissa Kapke
Statutory Foundations & Legislative Drivers	Delia Houseal
CY 2025 ESRD QIP Finalized Proposals <ul style="list-style-type: none">Remove the NHSN DE Reporting MeasureReplace the Comprehensive Kt/V Clinical Measure with Kt/V Dialysis Adequacy Measure TopicRevisions to Measure Domains and Measure Weights Used to Calculate the TPS	Delia Houseal
PY 2027 Performance Standards & Payment Reduction Scale	Delia Houseal
Estimated Distribution of Payment Reductions	Delia Houseal
Resources	Delia Houseal
Live Questions & Answers	Alissa Kapke

Submitting Questions

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- Under Q&A, select Ask a question.
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Please note that some questions may require additional research.
Any unanswered questions can be submitted to [QualityNet Question and Answer Tool](#)

Objectives

Attendees will be able to:

- Identify statutory and legislative components for the End-Stage Renal Disease Quality Incentive Program (ESRD QIP).
- Understand the finalized proposals in the calendar year (CY) 2025 ESRD Prospective Payment System (PPS) final rule for the ESRD QIP.
- State the rationale for the finalized policies and their impact on the ESRD QIP.
- Access resources for the ESRD QIP.

Guidance

- During today's presentation, the Centers for Medicare & Medicaid Services (CMS) will discuss the finalized updates for the ESRD QIP in the CY 2025 ESRD PPS final rule, published on Nov. 12, 2024.
- The information provided is offered as an informal reference and does not constitute official CMS guidance.
- CMS encourages stakeholders, advocates, and others to refer to the final rule located in the [*Federal Register*](#).
 - In the PDF version, ESRD QIP begins in Section IV, on page 90.



Statutory Foundations and Legislative Drivers

Legislative Drivers

- The ESRD QIP is described in section 1881(h) of the Social Security Act, as added by Section 153(c) of the Medicare Improvements for Patients and Providers Act of 2008 (MIPPA).
 - The program's intent is to promote patient health by providing a financial incentive for renal dialysis facilities to deliver high-quality patient care.
 - Section 1881(h) authorizes payment reductions of up to 2 percent if a facility does not meet or exceed the minimum Total Performance Score (TPS).
- The Protect Access to Medicare Act of 2014 added section 1881 (h)(2)(A)(iii).
 - The ESRD QIP must include measures specific to the conditions treated with oral-only drugs. These measures are required to be outcome-based, to the extent feasible.

Statutory Overview


MIPPA requires the Health and Human Services Secretary to create an ESRD QIP that will:

- Select measures that address the following:
 - Anemia
 - Dialysis adequacy
 - Patient satisfaction
 - Iron management, bone mineral metabolism, and vascular access
- Establish performance standards.
- Specify the performance period.
- Develop a methodology for calculating TPSs.
- Apply an appropriate payment percentage reduction.
- Publicly report results.

Policy Goals and Drivers

- CMS works to improve people's lives through advancing public policy to ensure the healthcare system works better for everyone.
- CMS announced the CMS strategic vision and six strategic pillars which are:





**CY 2025 ESRD QIP
Finalized Proposals**
Delia Houseal, PhD, MPH

Final Rule Summary

Remove One Measure

Replace One Measure


- NHSN DE Reporting Measure

Final Rule Summary

Remove One Measure

Replace One Measure

- Replace Comprehensive Kt/V Clinical Measure with Kt/V Dialysis Adequacy Measure Topic



**Finalized Proposal to
Remove the
NHSN DE Reporting
Measure
Beginning with
Payment Year (PY) 2027**

NHSN DE Reporting Measure

Rationale

- Measure performance is very high across facilities.
- NHSN DE data are now reported consistently, and the measure is not likely to drive improvements in care.
- Measure rate performance in the 5th percentile through the 100th percentile was 100% on the NHSN DE reporting measure during PY 2022 through PY 2024.
- Consistent with evolving the QIP to focus on a measure set of high-value, impactful measures that have been developed to drive care improvements for a broader set of ESRD patients.


Final Rule Action

NHSN DE Reporting Measure

- Remove the NHSN DE reporting measure from the ESRD QIP measure set under **removal factor 1**: *Measure performance among the majority of ESRD facilities is so high and unvarying that meaningful distinctions in improvements or performance can no longer be made.*

Rationale

Final Rule
Action



**Finalized Proposal to
Replace the
Comprehensive Kt/V Clinical
Measure with Kt/V Dialysis
Adequacy Measure Topic
Beginning with PY 2027**

Kt/V Dialysis Adequacy Measure

Topic

Rationale

- A facility would be more accurately assessed based on its actual ESRD patient population and treatment modalities
- Measure topic scoring takes into account the different ESRD populations and treatment modalities at a facility.
 - Performance on each of individual Kt/V measure is weighted proportionately based on facility's overall patient population.


Final Rule Action

Kt/V Dialysis Adequacy Measure Topic

Rationale

Final Rule
Action


- Remove the Kt/V Dialysis Adequacy Comprehensive clinical measure under **removal factor 5**: *A measure that is more strongly associated with desired patient outcomes for the particular topic becomes available.*
- Replace the Kt/V Dialysis Adequacy Comprehensive clinical measure with the proposed Kt/V Dialysis Adequacy Measure Topic, which consists of four individual Kt/V measures (i.e., adult hemodialysis (HD) Kt/V, adult peritoneal dialysis (PD) Kt/V, pediatric HD Kt/V, and pediatric PD Kt/V).
- Changes are effective in PY 2027.



**Revisions to
Measure Domains and
Measure Weights
Used to Calculate the TPS
Beginning with PY 2027**

Measure Domains and Weights Used to Calculate TPS

Measure/Measure Topics by Subdomain	Measure Weight as Percent of TPS PY 2026	New Measure Weight as Percent of TPS PY 2027
Patient and Family Engagement Measure Domain	15.00	15.00
In-Center Hemodialysis Consumer Assessment of Healthcare Providers and Systems (ICH CAHPS) measure	15.00	15.00
Care Coordination Measure Domain	30.00	30.00
Standardized Hospitalization Ratio (SHR) clinical measure	9.0	7.50
Standardized Readmission Ratio (SRR) clinical measure	9.0	7.50
Percentage of Prevalent Patient Waitlisted (PPPW) measure	6.0	7.50
Clinical Depression Screening and Follow-Up measure	6.0	7.50
Clinical Care Measure Domain	35.00	35.00
Kt/V Dialysis Adequacy measure topic	11.00	11.00
Long-Term Catheter Rate measure	12.00	12.00
Standardized Transfusion Ratio (STrR) measure	12.00	12.00
Safety Measure Domain	10.00	10.00
NHSN BSI	10.00	10.00
Reporting Measure Domain	10.00	10.00
Screening for Social Drivers of Health measure	N/A	1.67
Screen Positive Rate for Social Drivers of Health measure	N/A	1.67
Facility Commitment to Health Equity measure	2.0	1.67
Hypercalcemia measure	2.0	1.67
Medication Reconciliation (MedRec) measure	2.0	1.67
COVID-19 Healthcare Personnel (HCP) Vaccination measure	2.0	1.67



PY 2027
Performance Standards and
Payment Reduction Scale

Finalized Performance Standards for PY 2027 ESRD QIP Clinical Measures

Measure	Achievement Threshold (15 th Percentile)	Median (50 th Percentile)	Benchmark (90 th Percentile)
Long-Term Catheter Rate	18.35%*	11.04%*	4.69%*
Kt/V Dialysis Adequacy Measure Topic:			
Adult Hemodialysis (HD) Kt/V	95.79%	98.34%	99.68%
Pediatric Hemodialysis (HD) Kt/V	81.25%	92.37%	100.00%
Adult Peritoneal Dialysis (PD) Kt/V	87.34%	94.85%	99.04%
Pediatric Peritoneal Dialysis (PD) Kt/V	66.49%	82.06%	95.18%
Standardized Readmission Ratio	34.27*	26.5*	16.18
NHSN BSI	0.642	0.215	0.000*
Standardized Hospitalization Ratio	166.6*	129.14*	87.98*
Standardized Transfusion Ratio	48.29*	26.19*	8.46
PPPW	8.12%*	16.73%*	33.9%*
Clinical Depression Screening and Follow-Up	88.21%	94.34%	100%*
ICH CAHPS: Nephrologists' Communication and Caring	58.2%*	67.9%*	79.15%*
ICH CAHPS: Quality of Dialysis Center Care and Operations	55.68%	63.83%	74.22%
ICH CAHPS: Providing Information to Patients	74.49%*	81.09%*	87.8%*
ICH CAHPS: Overall Rating of Nephrologists	49.33%*	62.22%*	76.57%*
ICH CAHPS: Overall Rating of Dialysis Center Staff	51.78%	65.18%	79.68%
ICH CAHPS: Overall Rating of the Dialysis Facility	55.76%	69.69%	84.10%

*Values are the same final performance standards for those measures for PY 2026. In accordance with our longstanding policy, we are using those numerical values for those measures for PY 2027 because they are higher standards than the PY 2027 numerical values for those measures.

PY 2027 Payment Reduction Scale

A facility must meet or exceed a minimum Total Performance Score (mTPS) of **51** to avoid a payment reduction.

Estimated Payment Reduction Scale for PY 2027 Based on the Most Recently Available Data	
Total Performance Score	Reduction (%)
100–51	0%
50–41	0.5%
40–31	1.0%
30–21	1.5%
20–0	2.0%

Estimated Distribution of PY 2027 Payment Reductions

Total estimated payment reductions among 2,750 facilities expected to receive a payment reduction in PY 2027 is approximately \$17.9 million, with an estimated average of \$6,500 per facility.

Payment Reduction	Estimated Number of Facilities	Estimated Percent of Facilities*
0.0%	4,712	63.2%
0.5%	1,730	23.2%
1.0%	760	10.2%
1.5%	177	2.4%
2.0%	83	1.1%

*233 facilities not scored due to insufficient data

Resources



Resource	Location
General ESRD QIP Information	ESRD QIP Section on CMS.gov ESRD QIP Section on QualityNet
ESRD QIP Measures	Technical Specifications on CMS.gov ESRD QIP Measures on CMS.gov ICH CAHPS on CMS.gov ESRD QIP Measures on QualityNet
ESRD Public Reporting	Dialysis Facility Compare
ESRD Stakeholder Partners	Partners in ESRD Care
ESRD Final Rule	ESRD QIP Final Rule

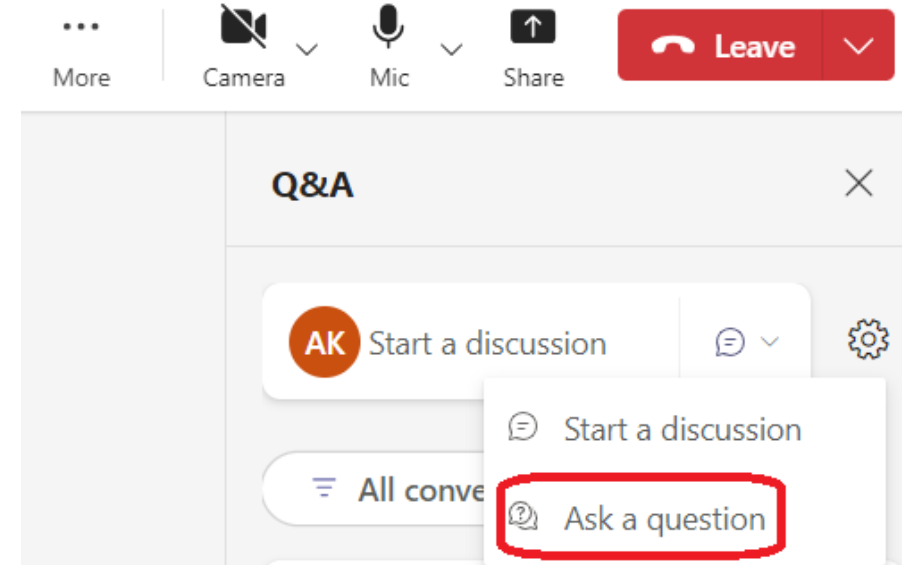
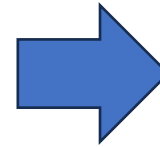
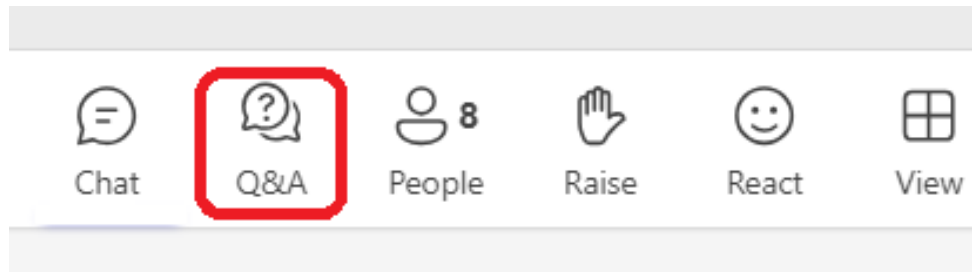
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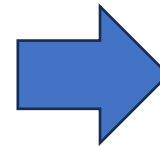
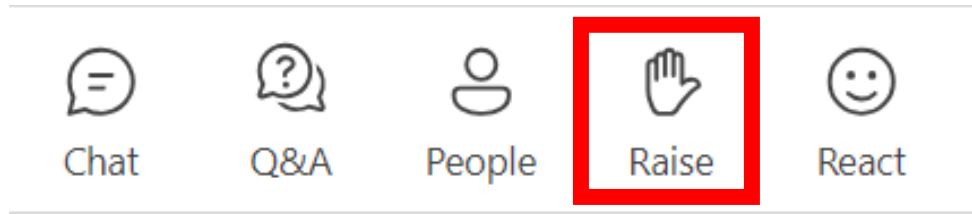
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Live Questions & Answers

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