

ESRD NETWORK 2024 ANNUAL REPORT

ESRD Network 15

This report will cover quality improvement efforts led by ESRD Network 15
Task Order Number 75FCMC21F0003 from May 1, 2024–April 30, 2025.

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ESRD Demographic Data

ESRD Network 15

Health Services Advisory Group (HSAG) as Network 15, works with patients, dialysis facilities, and transplant centers in Arizona, Colorado, Nevada, New Mexico, Utah, and Wyoming. Specifically, HSAG works to improve the quality of care and quality of life for patients with End Stage Renal Disease (ESRD). HSAG has held the Network 15 contract since 2016.

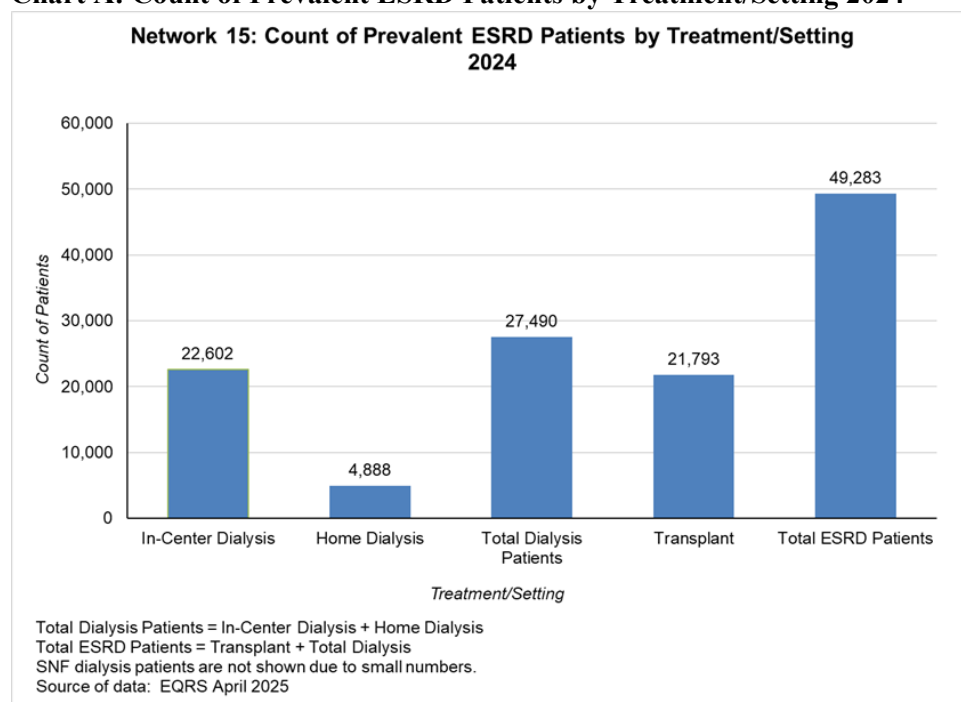
Geography and General Population

Geographically, Network 15 encompasses 21.00 percent of the landmass of the contiguous United States and includes mountains, plains, and desert. Urban population centers contain most residents. However, there are vast rural and wilderness areas in each state, which impact availability of care for ESRD patients due to travel length for treatments. According to the most recently available information from the U.S. Census Bureau, Network 15's population was estimated at 23,028,831 as of July 1, 2024.¹

ESRD Population

As of December 31, 2024, there were 27,490 dialysis patients and 21,793 transplant patients for a total of 49,283 patients with ESRD in the Network 15 service area. (See Chart A) The Network saw a total of 6,955 individuals newly diagnosed with ESRD in 2024. (See Chart B) Of these patients, 1,199 were home patients and 395 received a transplant. As of December 31, 2024, Network 15 comprised 5.30 percent of the total national prevalent dialysis patient population and 5.40 percent of the national incident patient population. (See Charts C and D, respectively)

Chart A: Count of Prevalent ESRD Patients by Treatment/Setting 2024



EQRS = ESRD Quality Reporting System

¹United States Census Bureau. Quick Facts. Available at <https://www.census.gov/quickfacts/fact/table/NV,CO,NM,UT,AZ,WY/PST045224>. Accessed on June 17, 2025.

Chart B: Count of Incident ESRD Patients by Initial Treatment/Setting 2024

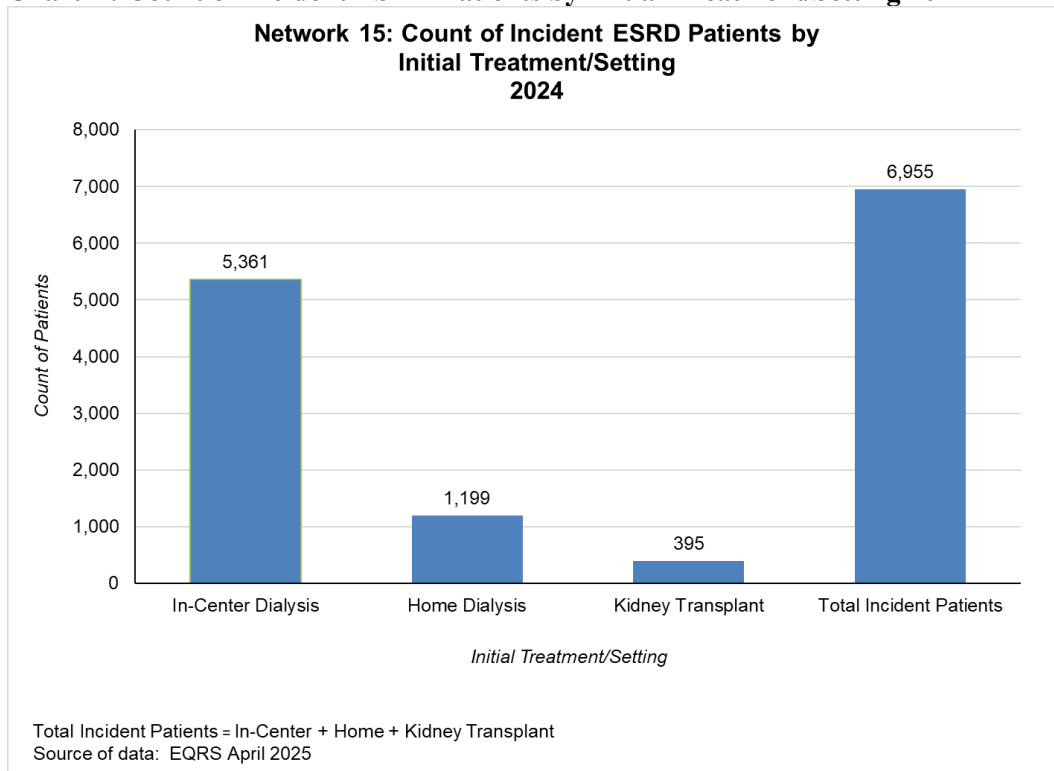


Chart C: Percent of National Incident Dialysis Patients by ESRD Network 2024

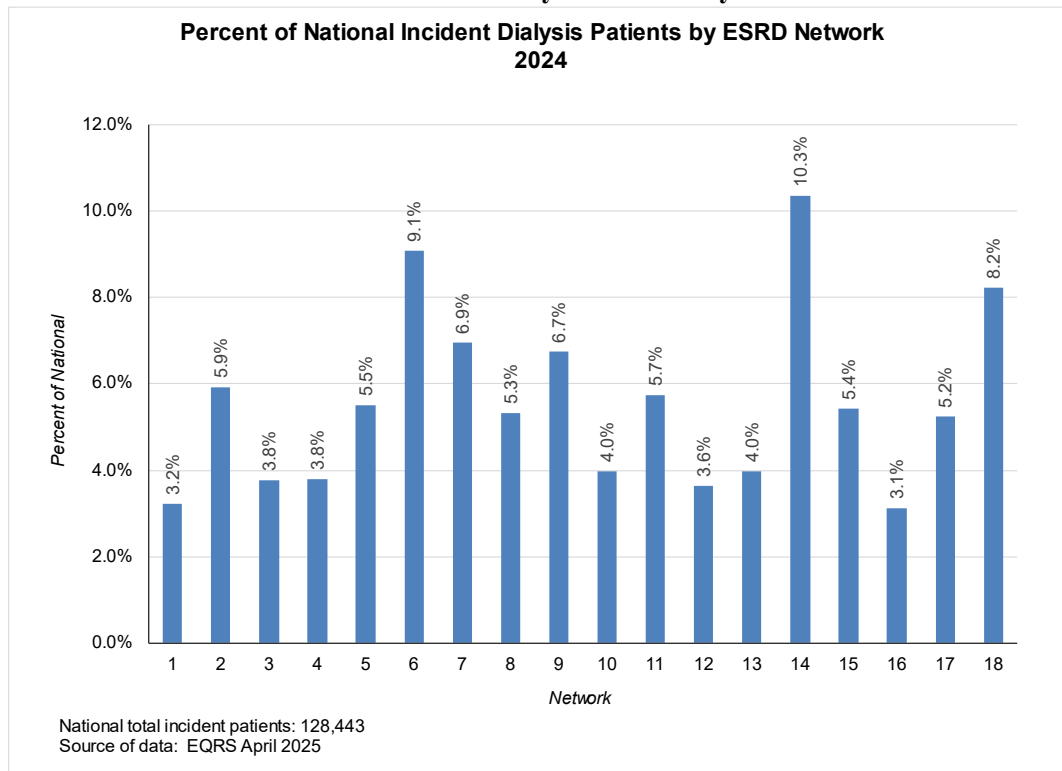
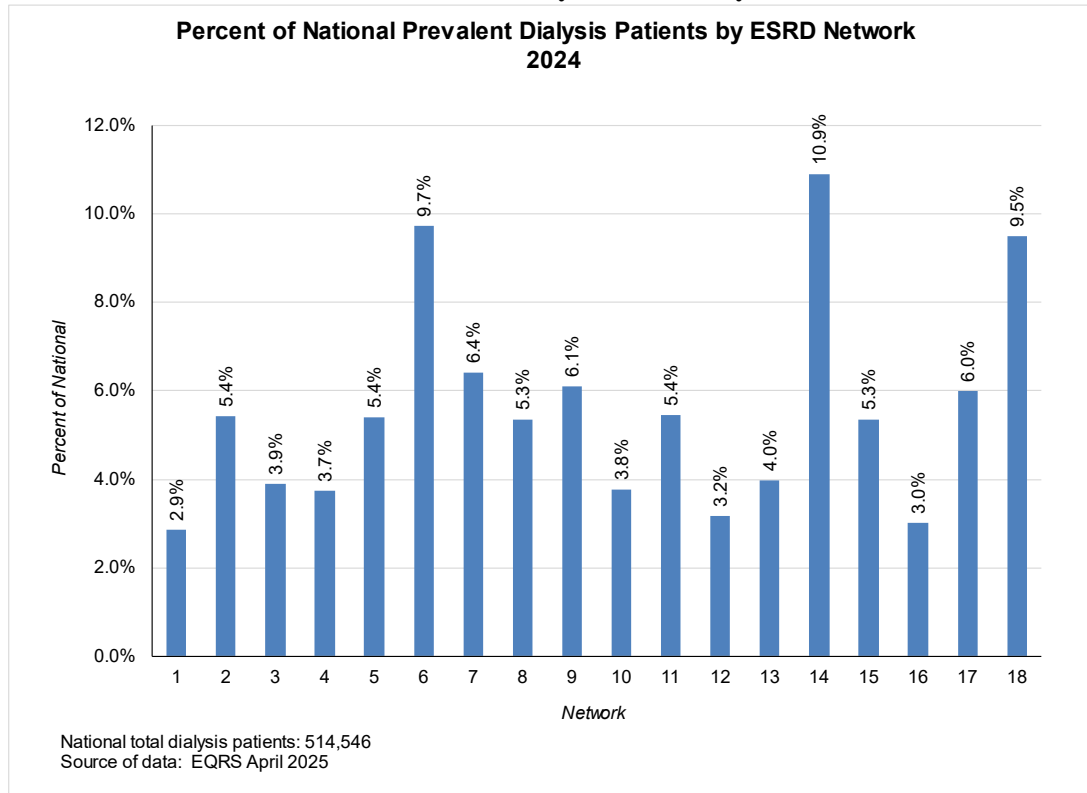


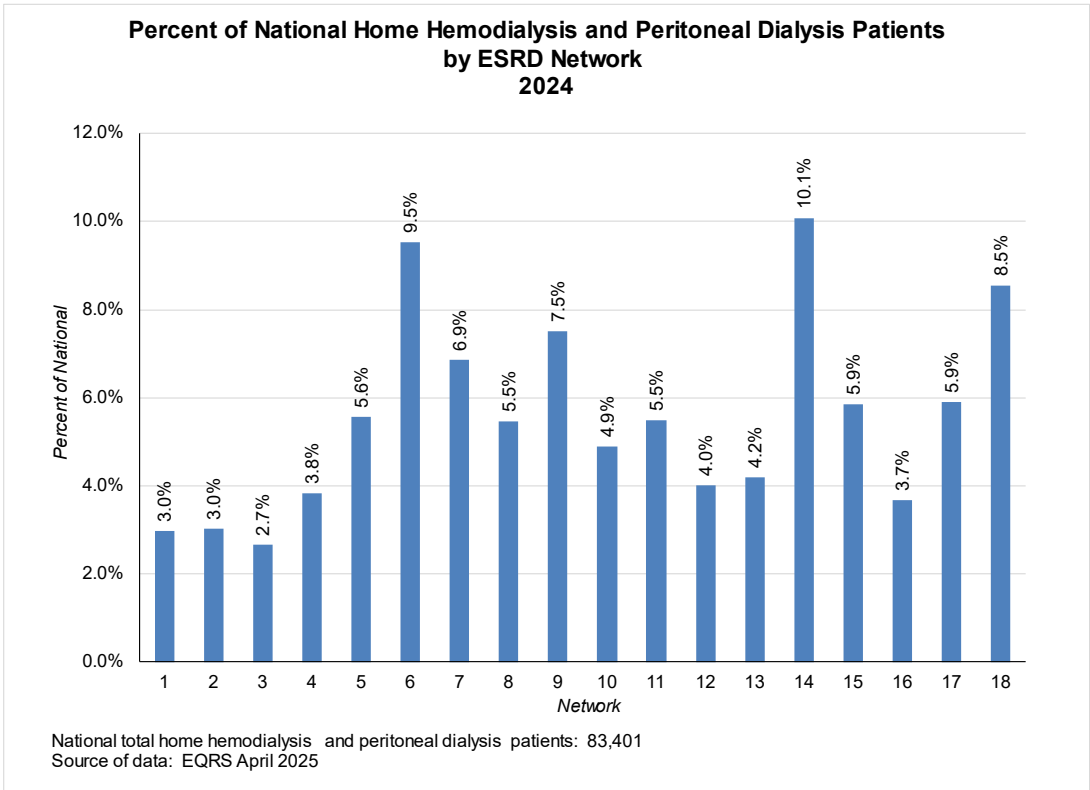
Chart D: Percent of National Prevalent Dialysis Patients by ESRD Network 2024



Dialysis Treatment Options

As of December 31, 2024, 22,602 (82.21%) of Network 15’s prevalent dialysis patients were receiving in-center hemodialysis (ICHD) treatments and 4,888 (17.78%) were using a home dialysis modality, including continuous cycling peritoneal dialysis (CCPD), continuous ambulatory peritoneal dialysis (CAPD), or home hemodialysis (HHD). (See Chart A) This is a 0.5-point increase in patients using home dialysis from 2023. Nationally, the Network comprised 5.90 percent of all HHD, CCPD, and CAPD patients. (See Chart E)

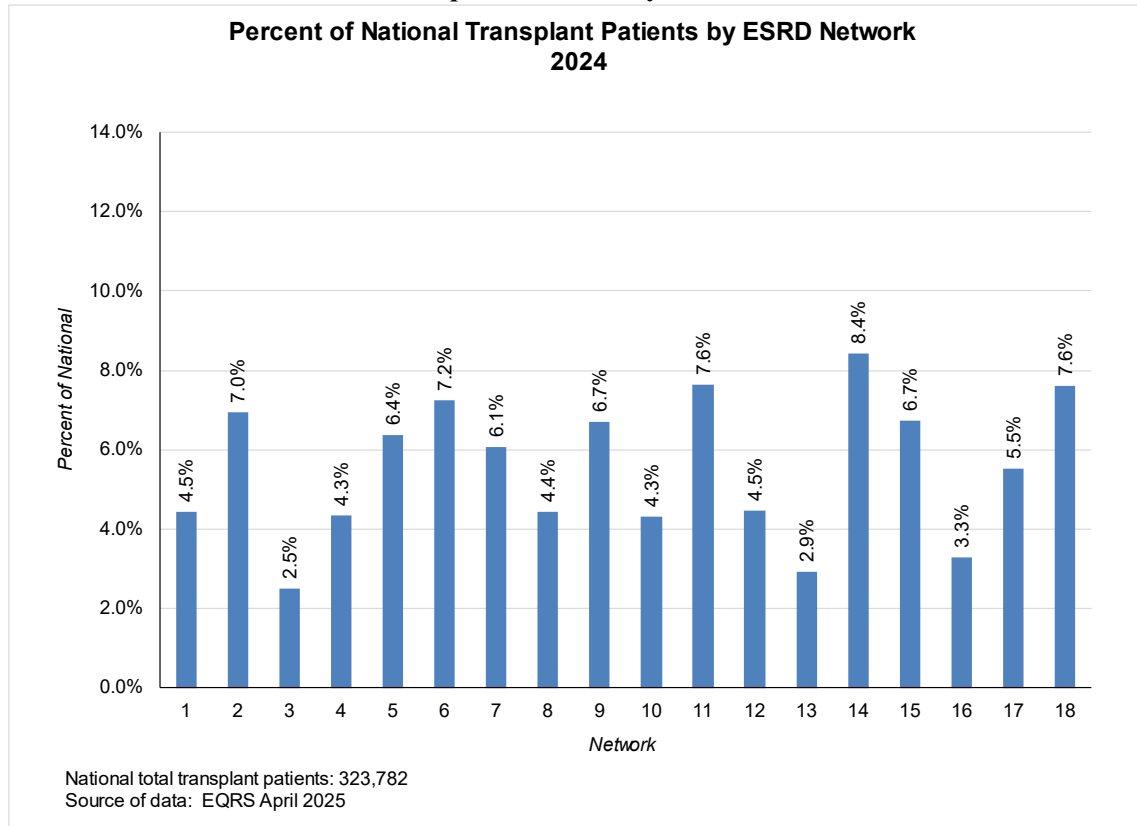
Chart E: Percent of National Home Hemodialysis and Peritoneal Dialysis Patients by ESRD Network 2024



Transplant

During 2024, transplants were completed by 15 transplant centers in Network 15. As of December 31, 2024, there were 323,782 transplant patients nationally, of which 6.70 percent were in Network 15. (See Chart F)

Chart F: Percent of National Transplant Patients by ESRD Network 2024



ESRD Facilities

As of December 31, 2024, the Network 15 service area included a total of 399 ESRD facilities, including 384 dialysis facilities and 15 transplant facilities. (See Chart G) Nationally, Network 15 comprised 5.00 percent of all dialysis facilities and 6.70 percent of all transplant facilities. (See Charts H and I, respectively)

Chart G: Count of Medicare-Certified Facilities by Treatment/Setting 2024

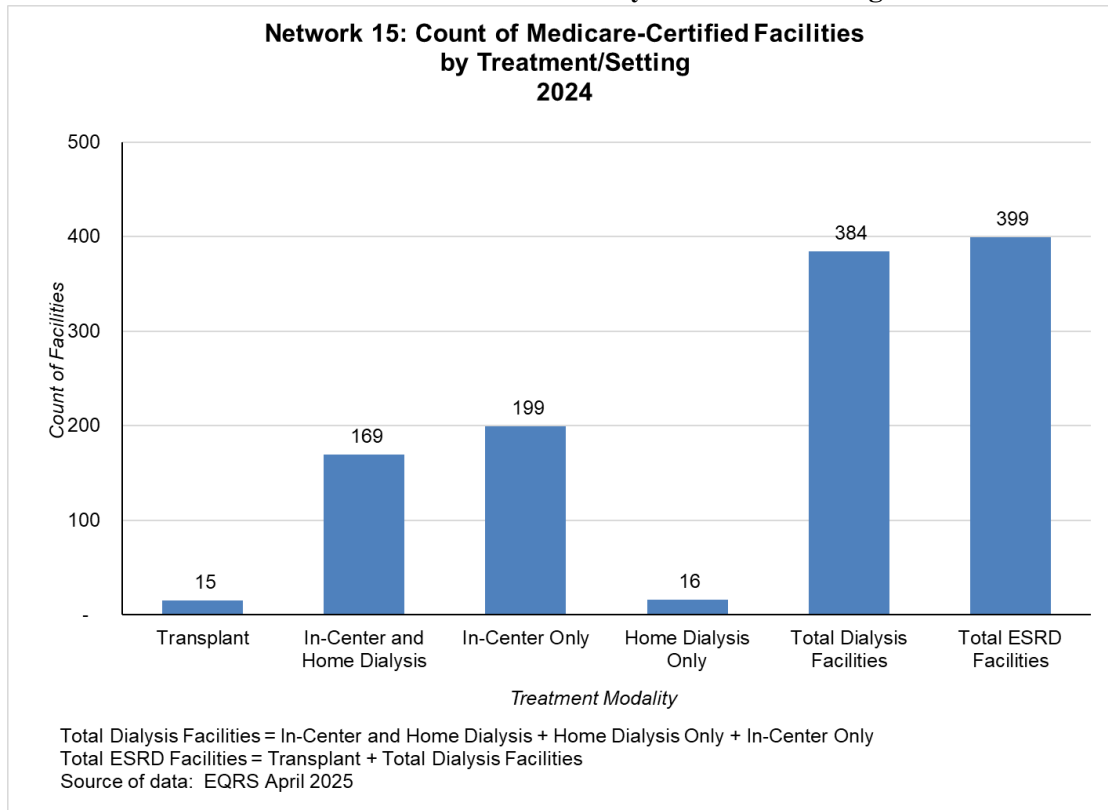


Chart H: Percent of Medicare-Certified Dialysis Facilities by ESRD Network 2024

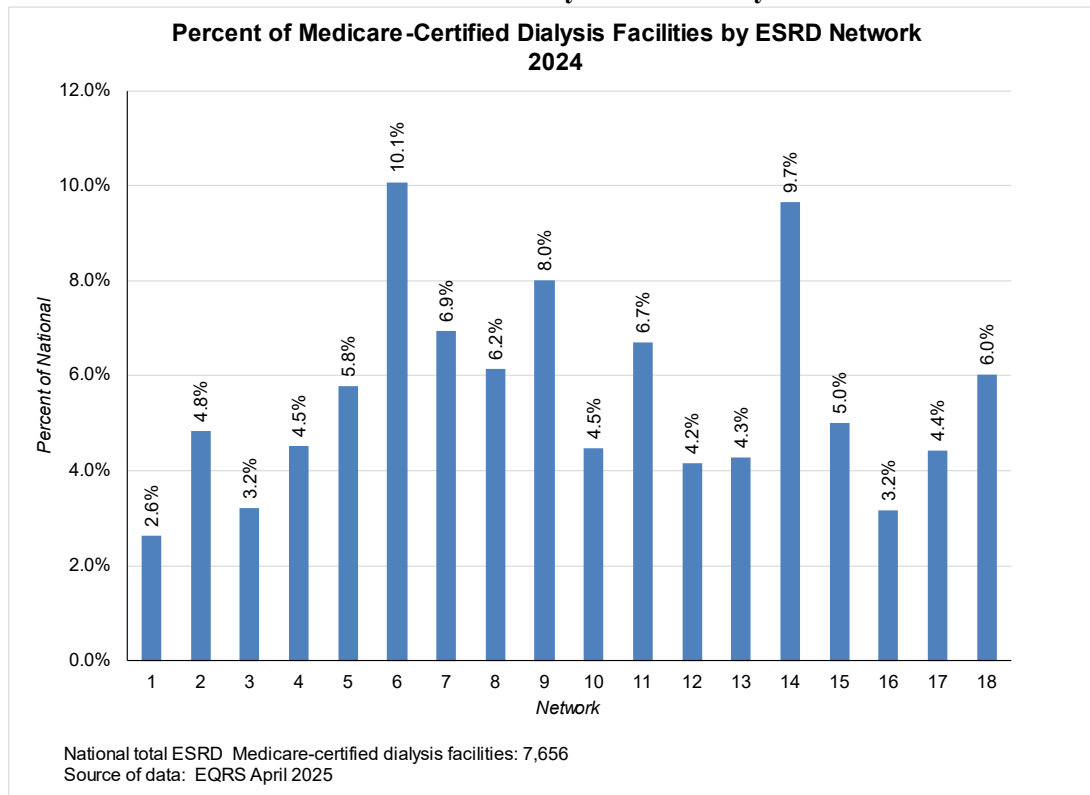
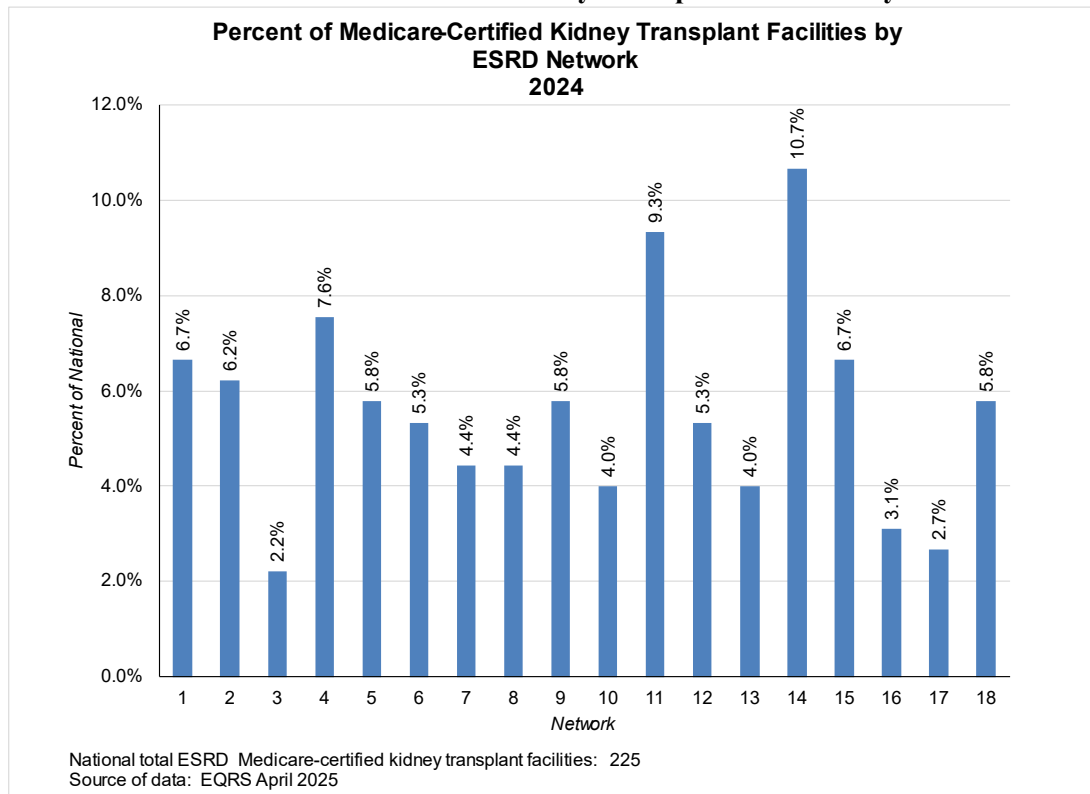


Chart I: Percent of Medicare-Certified Kidney Transplant Facilities by ESRD Network 2024



Transplant Waitlist & Transplanted Quality Improvement Activity (QIA) May 2024–April 2025

Goals and Outcomes

The Transplant QIA implemented May 2024–April 2025 included two goals:

- Achieve a 14.00 percent increase in the number of patients added to a kidney transplant waiting list by April 2025, using the calendar year 2020 as a baseline.
- Achieve a 20.00 percent increase in the number of patients receiving a kidney transplant by April 2025, using the calendar year 2020 as a baseline.

By March 2025, the Network achieved 134.00 percent of the goal with 1,474 patients added to a transplant waitlist. (See Chart J) The Network also had 1,085 patients receive a transplant, which resulted in meeting 83.97 percent of the goal. (See Chart K) Additional QIA data were not available after March 2025.

Barriers

Barriers to meeting the QIA goals included:

- Patients' inability to meet the criteria for transplant referral or to complete the evaluation process.
- Patient-level psychosocial issues, including caregiver support, insurance coverage, and financial barriers.
- Lack of collaborative case management and consistent follow-up by dialysis facilities with transplant centers.
- Staffing vacancies at transplant centers, which restrict the number of patients who can be managed on the waiting list and/or transplanted.
- A decrease in available organs from outside the local organ procurement organization (OPO) service area due to changes in the kidney allocation system and other transplant centers increasing their acceptance of organs.

Interventions

Interventions that were implemented included:

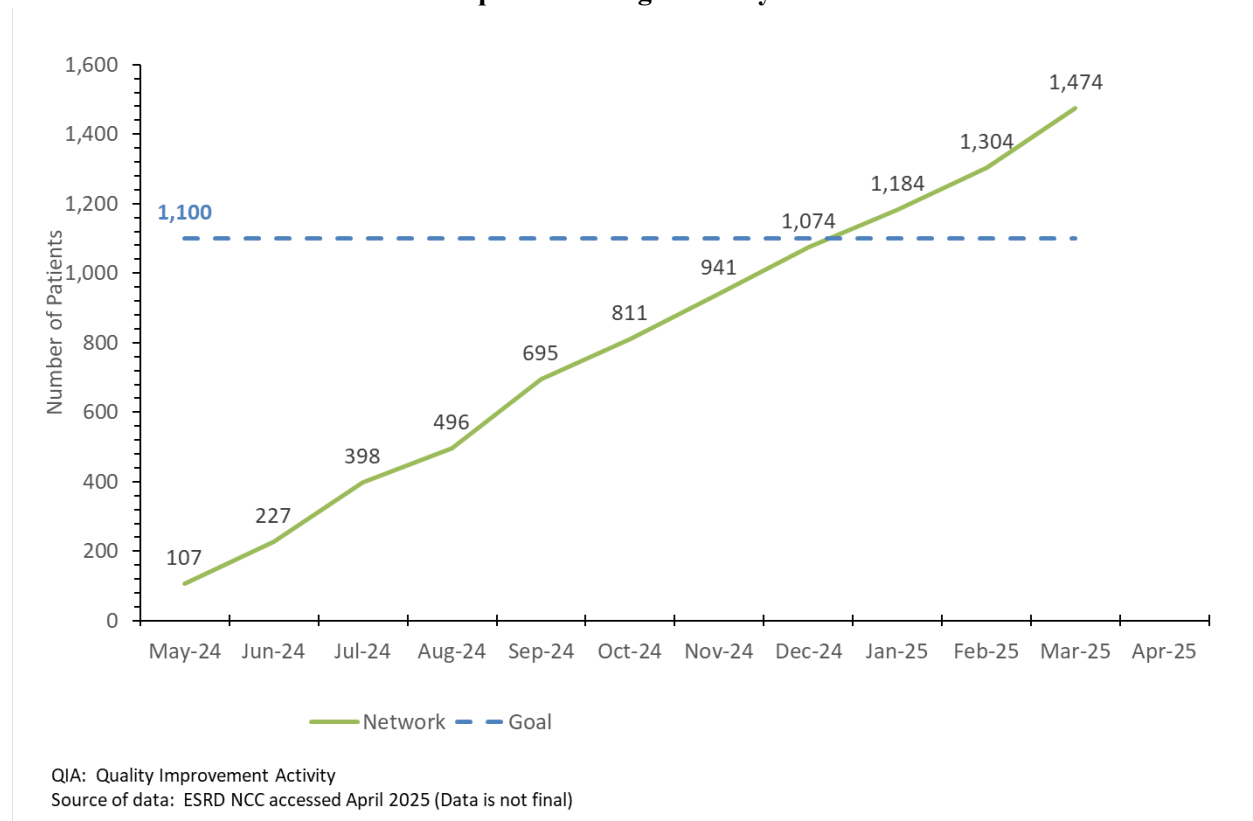
- Providing dialysis facilities with technical assistance to review available data, conduct a facility-specific root cause analysis (RCA), and implement recommended resources and interventions for the facility's action plan.
- Coaching dialysis facilities on how to implement the following tools for improvement:
 - A Change Package to Increase Kidney Transplantation
 - ESRD Quality Reporting System (EQRS) Transplant Dashboard
 - The Network-developed Transplant Ready Review Checklist
- Educating dialysis staff and patients regarding transplant options and processes (e.g., Kidney Donor Profile Index [KDPI] information).
- Using a Network-developed Quality Assurance and Performance Improvement (QAPI) tracking and reporting form to lead discussions of progress toward waitlisting and transplant goals in the facilities' monthly QAPI meetings.

Best Practices

Best practices identified from the QIA included:

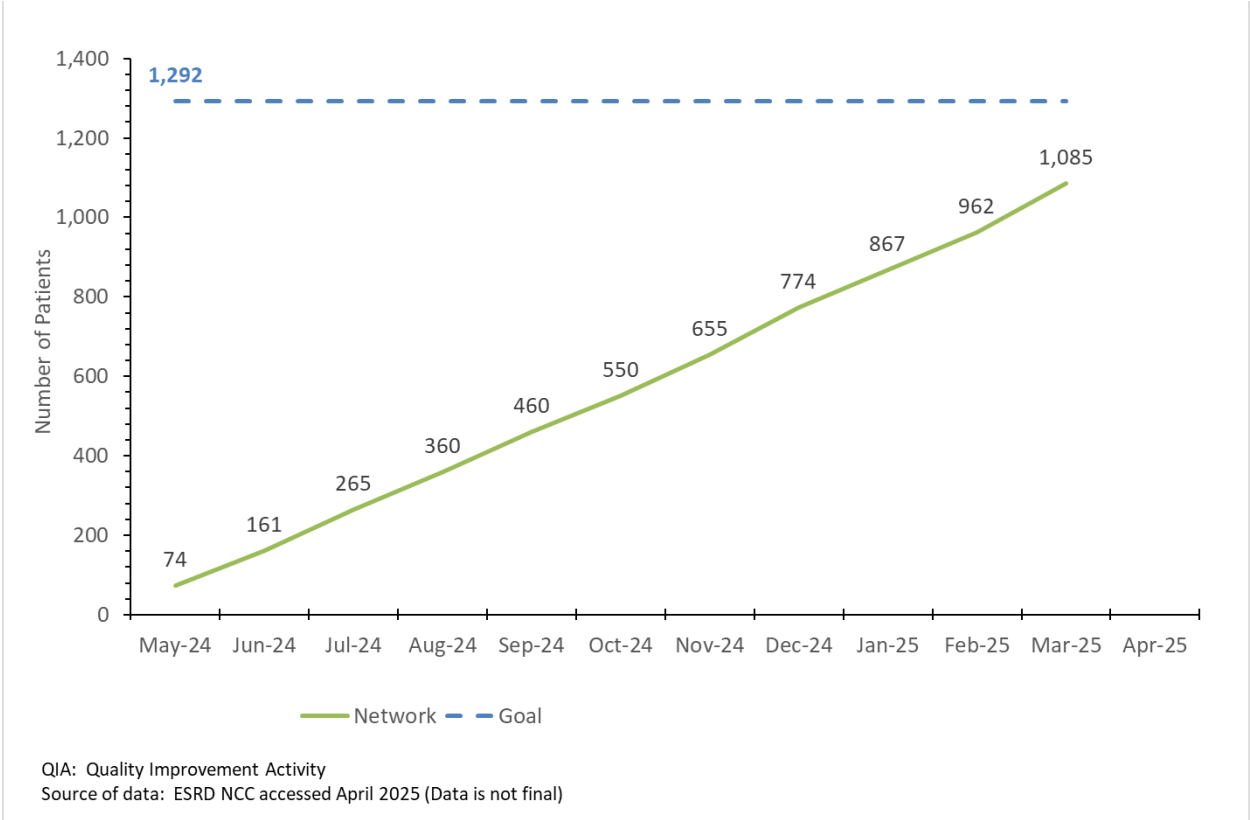
- Tracking and documenting all patients' referral, evaluation, and progress through the process of being added to the transplant waitlist.
- Developing relationships with transplant coordinators to effectively and consistently communicate patient status updates and to collaboratively provide patients with support to be waitlisted.
- Involving the entire care team in educating and supporting patients throughout their transplant journey and providing encouragement during the long process of waitlisting and staying transplant-ready.
- Providing staff education/in-services on the importance of transplant and motivational interviewing to encourage patients to consider transplant and complete the evaluation.
- Using the *Transplant Change Package* as a resource to overcome barriers using proven successful interventions.

Chart J: Patients Added to the Transplant Waiting List May 2024–March 2025



ESRD NCC = ESRD National Coordinating Center

Chart K: Patients Receiving a Kidney Transplant May 2024–March 2025



Home Therapy (Incident & Prevalent Using Home) QIA May 2024–April 2025

Goals and Outcomes

The Home Therapy QIA that was implemented May 2024–April 2025 included two goals:

- Achieve a 15.00 percent increase from the 2023–2024 baseline in the number of incident ESRD patients who start a home modality within 90 days of starting dialysis.
- Achieve an 8.00 percent increase from the 2023–2024 baseline in the number of prevalent ESRD patients who move to a home modality.

By March 2025, the Network achieved 76.70 percent of the goal with 1,297 incident patients starting on home dialysis. The Network also had 1,064 prevalent patients transition to a home modality, which resulted in meeting 81.90 percent of the goal. (See Charts L and M, respectively) Additional QIA data were not available after March 2025.

Barriers

Barriers to meeting QIA goals included:

- Lack of education provided to in-center dialysis staff about home dialysis that prevented the development of a “pro-home dialysis” culture at the facility.
- Patients who are resistant to changing modalities due to their comfort with in-center dialysis.
- Unavailable physical space for patients to store supplies or perform dialysis at home.
- Nursing shortages to train for home modalities.

Interventions

The following interventions were implemented over the course of the QIA:

- Using the *Change Package to Increase Home Dialysis Use* as a resource to overcome barriers and create new action plans.
- Providing targeted technical assistance and resources to facilities based on their RCAs.
- Collaborating with a home dialysis program to provide in-person or telehealth education to interested patients and families regarding home dialysis.
- Providing patients and staff with home modality education that incorporates the patient voice.
- Providing additional education to in-center dialysis staff using new materials, resources, or unique learning strategies (e.g., dialysis bingo or other games).
- Creating and distributing the Network resource, *Home Dialysis Group Training Best Practices*.

Best Practices

Best practices identified through the QIA included:

- Implementing an “all team” approach by creating a process to educate staff so they can talk with patients about their modality options.
- Ensuring collaboration between in-center dialysis facilities and home programs for continuity of patient education and care.
- Focusing on modality education with new patients before they get too reliant on in-center dialysis.

- Distributing the article, *Traveling the U.S. with an RV and Home Hemodialysis*, from Home Dialysis Central to give a specific example of patients thriving on a home modality with limited space.
- Completing home visits to evaluate the storage space available and problem-solve based on patients' individual needs.

Chart L: Count of Incident Patients Starting Dialysis Using a Home Modality (May 2024–March 2025)

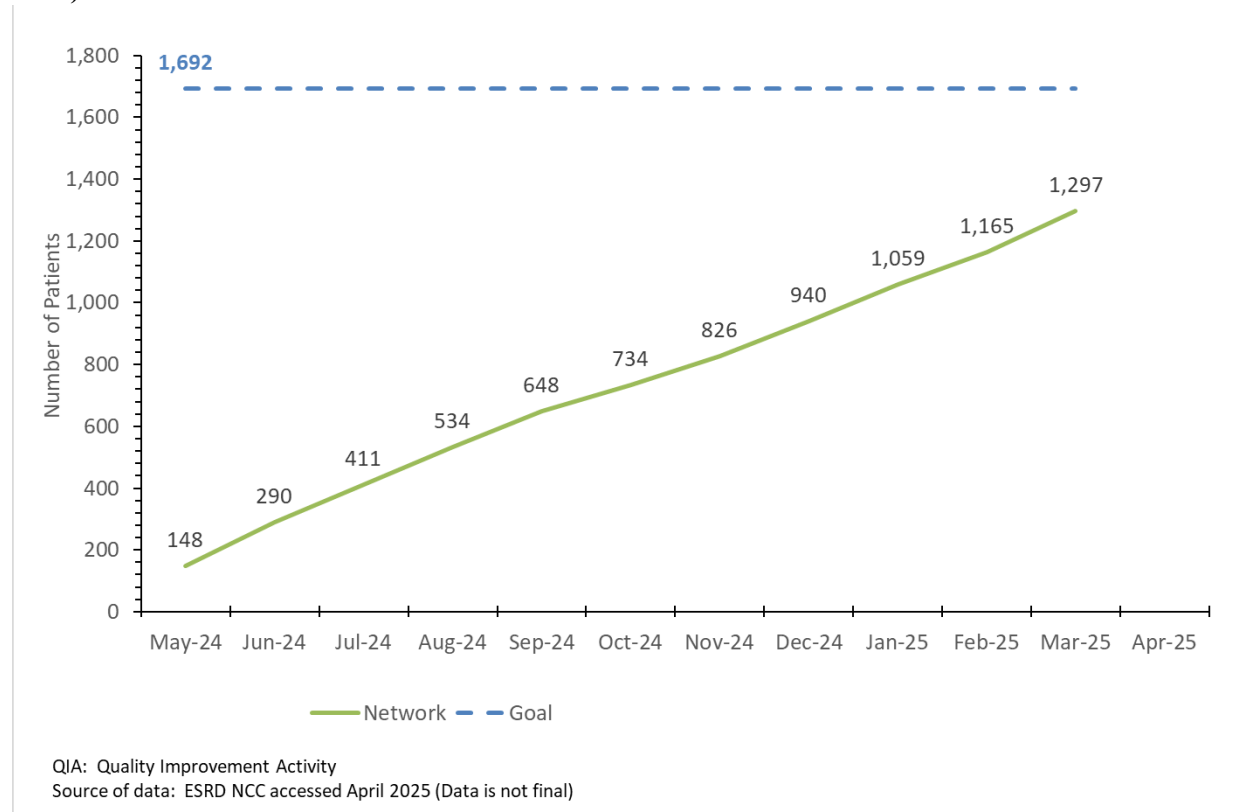
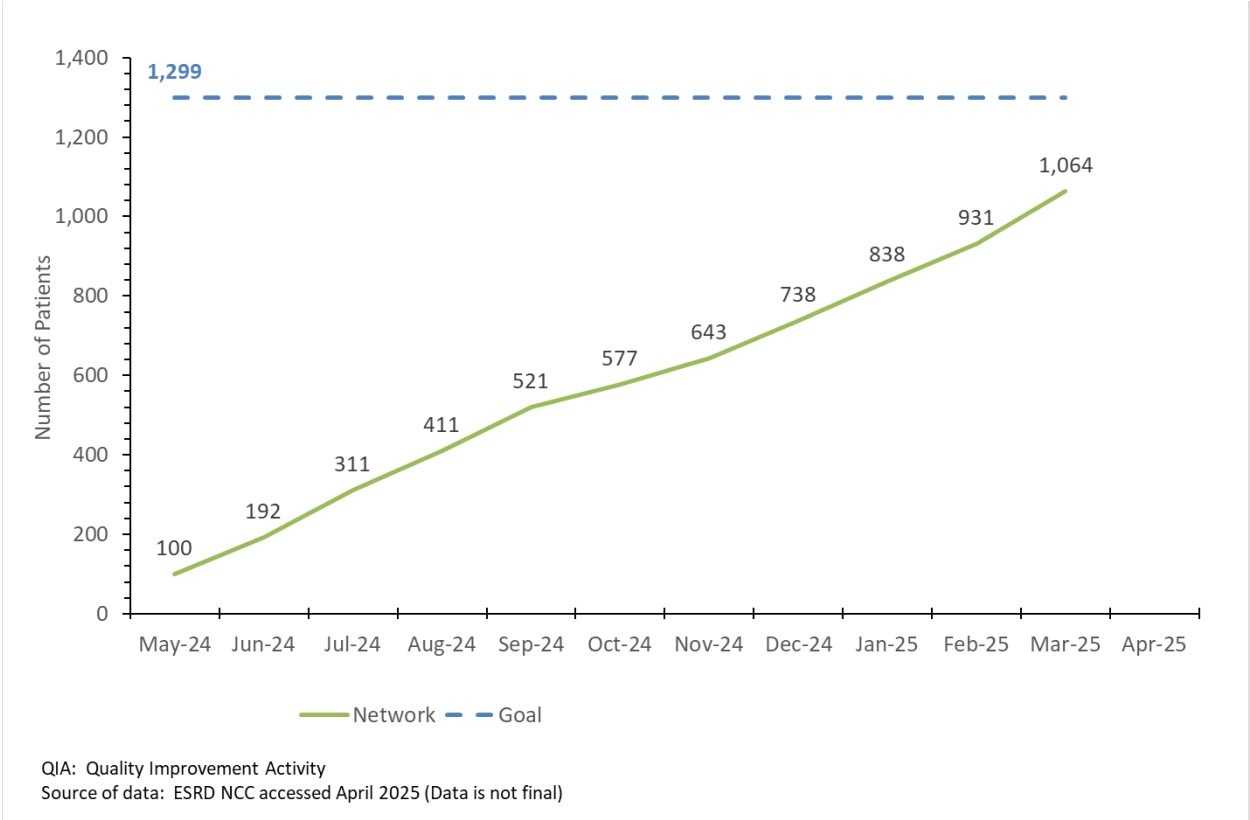


Chart M: Count of Prevalent Patients Moving to a Home Modality (May 2024–March 2025)



Patient Influenza Vaccination QIA May 2024–April 2025

Goal and Outcomes

The goal of the QIA was to achieve a patient influenza vaccination rate of 80.00 percent by April 2025.

By March 2025, the Network achieved 81.78 percent of patients receiving an influenza vaccination. (See Chart N). Additional QIA data were not available after March 2025.

Barriers

Barriers to achieving the QIA goal included:

- Tracking patients and staff who received the influenza vaccine outside the dialysis facility.
- Patient and staff hesitancy and refusal due to personal, religious, or political beliefs.
- Data reporting challenges, including facility and EQRS batching delays, facilities not reporting, and facilities not having appropriate staff to report consistently.

Interventions

Interventions for the QIA included:

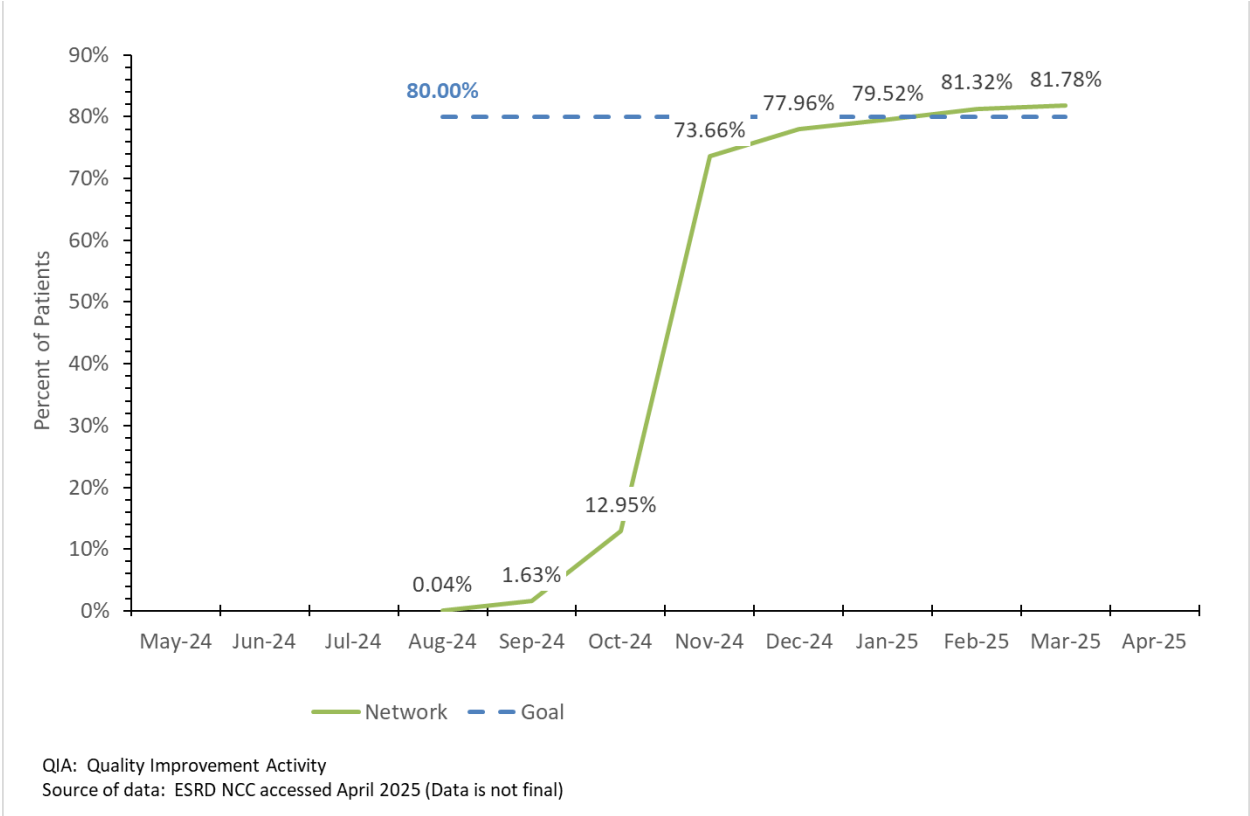
- Providing targeted technical assistance to facilities to complete RCAs and use the *Change Package to Increase Vaccinations* and its primary and secondary drivers (e.g., *Achieve a High-Performing Culture and Implement Quality Improvement Strategies*).
- Promoting the use of state vaccination registries to identify vaccinations that patients received outside of the facility so they could be documented in EQRS.
- Sharing influenza vaccination educational materials and other resources from reputable sources that facilities could use to educate patients and staff during vaccination conversations.
- Assisting facilities with instructions to manually report vaccinations to EQRS or to contact corporate leadership to improve EQRS batch vaccination reporting.

Best Practices

Best practices identified from the QIA included:

- Completing an RCA and action plan to identify barriers and implement interventions from the *Change Package to Increase Vaccinations*.
- Comparing internal tracking of patient vaccinations to those entered in EQRS to identify patients without a reported vaccination.
- Providing follow-up education and offering vaccinations to patients and staff who previously refused or were initially hesitant.
- Using Network-provided resources and tools for educating patients and staff.
- Engaging facilities via technical assistance to enter vaccinations in EQRS.
- Having the facility medical director talk directly with patients about vaccinations.

Chart N: Percent of Patients Receiving an Influenza Vaccination May 2024–March 2025



Pneumococcal Vaccination QIA May 2024–April 2025

Goal and Outcomes

The QIA goal was to increase the patient percentage who were up to date for pneumococcal pneumonia vaccinations by 10.00 percent over baseline by April 2025.

By March 2025, the Network achieved a rate of 68.98 percent, which exceeded the goal of 65.13 percent, and included 18,257 patients being up to date for vaccinations. (See Chart O) Additional QIA data were not available after March 2025.

Barriers

Barriers to achieving the QIA goal included:

- Patient hesitancy and refusal due to personal beliefs.
- Lack of facility knowledge regarding the Centers for Disease Control and Prevention (CDC) recommendations or facility policies regarding which vaccinations to provide and when.
- Lack of consistent tracking and reporting of patient vaccinations in EQRS.
- Lack of awareness regarding how to compare patient vaccination status in internal systems to EQRS data.

Interventions

Interventions for the QIA included:

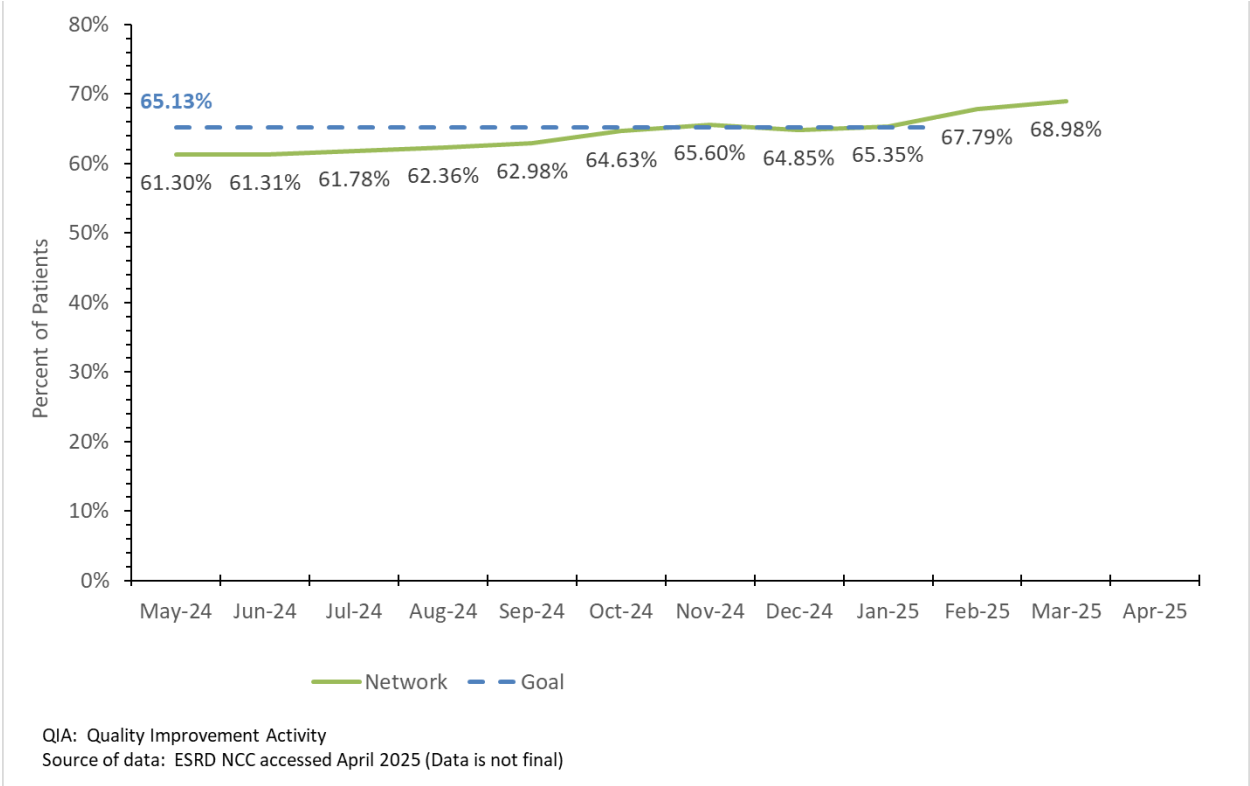
- Providing technical assistance to individual facilities to complete RCAs and action plans using the *Change Package to Increase Vaccinations*.
- Sharing reputable, community coalition-recommended educational resources that facilities could use to educate patients during vaccination conversations.
- Engaging facilities to improve their knowledge regarding the CDC recommendations for pneumococcal vaccinations.
- Coaching facilities to obtain access to EQRS, review the vaccination dashboard, identify patients needing vaccinations, and report vaccinations.

Best Practices

Best practices identified throughout the QIA by facilities included:

- Completing a facility-specific RCA and action plan to identify barriers and implement resources and processes using change ideas from the *Change Package to Increase Vaccinations*.
- Providing follow-up education and offering vaccinations to patients and staff who previously refused or were initially hesitant.
- Having the facility medical director talk directly with patients about vaccinations.
- Comparing vaccinations documented in internal systems to those reported in EQRS.

Chart O: Percent of Dialysis Patients Who Are Up to Date for Pneumococcal Pneumonia Vaccinations May 2024–March 2025



Data Quality QIA (CMS-2728 and CMS-2746 Forms) May 2024–April 2025

Goals and Outcomes

The QIA goals included:

- Achieving a 9.00 percent increase in CMS-2728 forms submitted within 45 days of the date the patient started chronic dialysis at the current facility.
- Achieving a 14.00 percent increase in CMS-2746 forms submitted within 14 days of the date of death.

By March 2025, the Network achieved 80.41 percent of 2728 forms' timeliness, which exceeded the goal of 79.21 percent. The Network also achieved 66.48 percent of 2746 forms' timeliness which exceeded the goal of 62.85 percent. (See Charts P and Q, respectively).

Barriers

Barriers to achieving the QIA goals included:

- Lack of dialysis facility staff knowledge of submission time requirements and/or consistent facility processes to submit forms on time.
- Difficulty obtaining patient and physician signatures and/or the needed medical records to complete forms on time.
- Delays with facilities documenting patient admissions and/or discharges then delays 2728 and 2746 forms that appear as due in the facility's EQRS dashboard.

Interventions

Interventions for the QIA included:

- Discussing timeliness of admissions and forms when facilities contact the Network for technical assistance with other issues.
- Providing facilities with technical assistance to conduct RCAs, create an action plan, and implement recommend resources for improvement (e.g., *Tips for Completing CMS 2728 and CMS 2746 Forms Timely*).
- Reminding facilities via email and phone to complete specific forms coming due in 7–14 days.
- Distributing facility-specific data reports for review, comparison, and benchmarking with internal data during QAPI meetings.
- Recommending facilities focus on interventions to improve timeliness with one form at a time (e.g., physician signatures for 2728).

Best Practices

Best practices identified throughout the QIA by facilities included:

- Using a team approach to address areas of improvement and ensure multiple facility staff have access to EQRS.
- Having a tracking system in place for all admissions, discharges, and forms.
- Faxing 2728 forms to physician offices for signatures.
- Communicating with hospital discharge planners to obtain information needed for forms.

Chart P: Percent of Initial CMS-2728 Forms Submitted Within Forty-Five (45) Days May 2024–March 2025

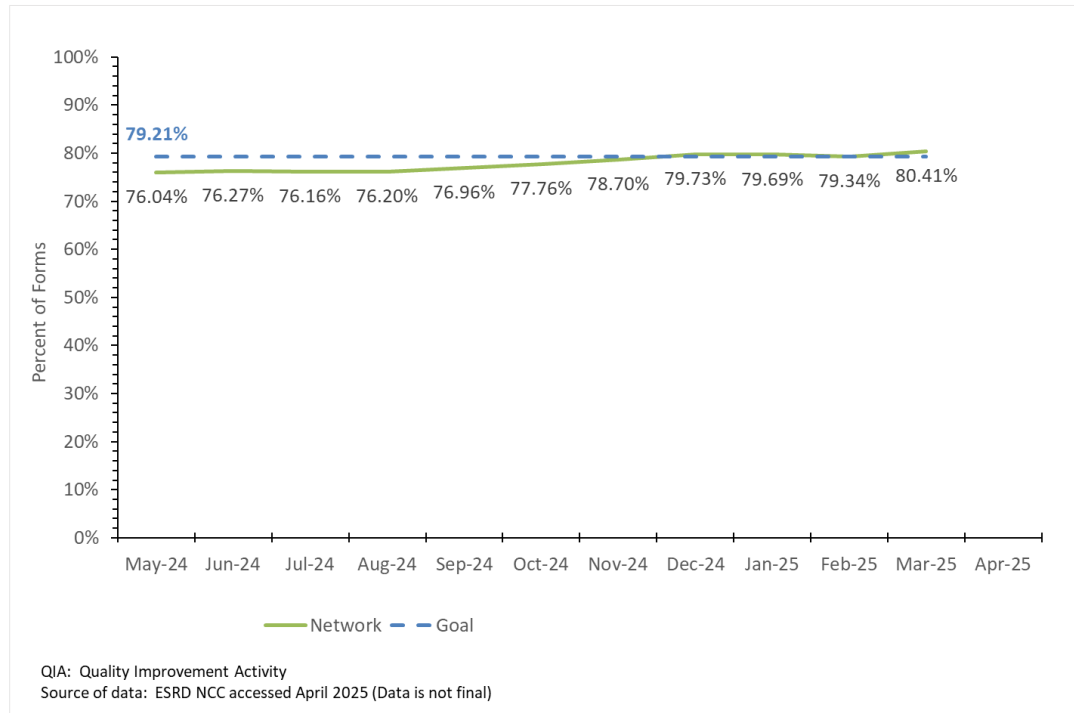
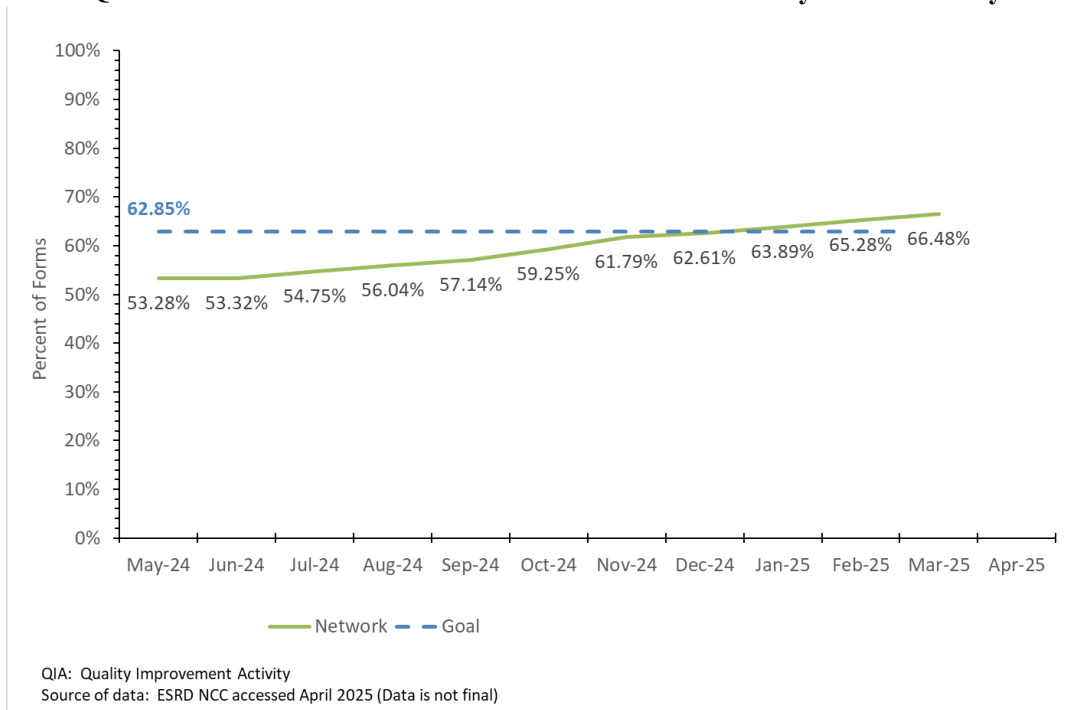


Chart Q: Percent of CMS-2746 Forms Submitted Within 14 Days of Death May 2024–March 2025



Hospitalizations and Emergency Department (ED) Visits QIA May 2024–April 2025

Goals and Outcomes

The QIA goals included reducing the following by 9.00 percent by April 2025:

- The rate of ESRD-related hospital admissions.
- The rate of ESRD-related ED visits.

By March 2025, the Network achieved a rate of 2.01 percent for ESRD-related hospitalizations which did not meet the reduction goal of 1.72 percent. The Network also achieved 0.67 percent for ED visits, which did not meet the reduction goal of 0.66 percent. (See Charts R and S, respectively).

Barriers

Barriers to achieving the QIA goals included:

- Lack of patient and staff education regarding:
 - The importance of preventing, identifying, and fully treating any signs, symptoms, or active diagnosis of sepsis.
 - Comorbid condition follow-up.
 - The advantages of using outpatient providers when available and appropriate.
- Lack of patient communication with the facility about care sought outside of dialysis for both ESRD and comorbid health conditions. This barrier prevented dialysis staff from assisting patients prior to escalation or repeated hospital use.
- Patients who do not attend regular treatments, refuse to discuss their dialysis plan with facility staff prior to seeking hospital care, and are not motivated to follow an outpatient treatment routine.
- Facility staff not fully engaging patients with education and follow-up about hospital visits not directly related to dialysis, which creates a risk of readmission.
- Difficulties in obtaining hospital records promptly so staff can review them and assist patients with follow-up.
- High patient hospital admission rates with a claim code of sepsis, due to patients receiving a sepsis evaluation and only a small percentage of the admissions being an actual sepsis event.

Interventions

Interventions for the QIA included:

- Providing facilities with targeted technical assistance to conduct a facility-specific RCA, identify opportunities for change, and to develop an action plan to address unplanned hospital use.
- Using the *Change Package to Reduce Hospitalizations* to identify and implement change ideas to address the facility's primary barriers to keeping patients out of the hospital.
- Reviewing available data to identify facility hospitalization trends and opportunities for improvement related to the reasons for hospitalizations.
- Discussing the QIA, RCA, action plan, interventions, and outcomes with the interdisciplinary team (IDT) during monthly QAPI meetings.
- Tracking and monitoring interventions, outcomes, and metrics to identify increases in unplanned hospital use and prevent future use.

- Educating patients and staff on sepsis prevention and the areas of improvement identified in the RCA and action plan.
- Addressing nonadherent patients with open communication and motivational interviewing, and educating them regarding negative outcomes (e.g., increased risk of hospitalization and death) when routine dialysis is shortened or missed.

Best Practices

Best practices identified by QIA facilities included:

- Using a team approach to educating patients, tracking events, and implementing interventions.
- Focusing on interventions that address the top-identified diagnoses that cause hospital admissions and readmissions, including sepsis.
- Completing a post-hospitalization checklist for all patients returning to the facility, emphasizing lessons learned to avoid future hospital stays and discharge instruction implementation.
- Communicating with hospital discharge planners pre- and post-discharge to address barriers to successfully transitioning the patient back home. Further, these communications should include recommending services and completing medical appointment scheduling.
- Engaging skilled nursing facility staff to communicate patient care needs and implement a plan to avoid unplanned hospital use.
- Focusing on patient dry weight management, including performing regular dry weight reviews, scheduling patients for additional treatments, providing enhanced patient education, and training staff on proper weighing of patients.
- Assisting patients with finding a primary care provider, including the use of Federally Qualified Health Care Center resources in the area.
- Providing case management and close follow-up to patients who are high utilizers of hospital services.

Chart R: Rate of ESRD-Related Hospital Admissions per 100 Patient-Months May 2024–March 2025

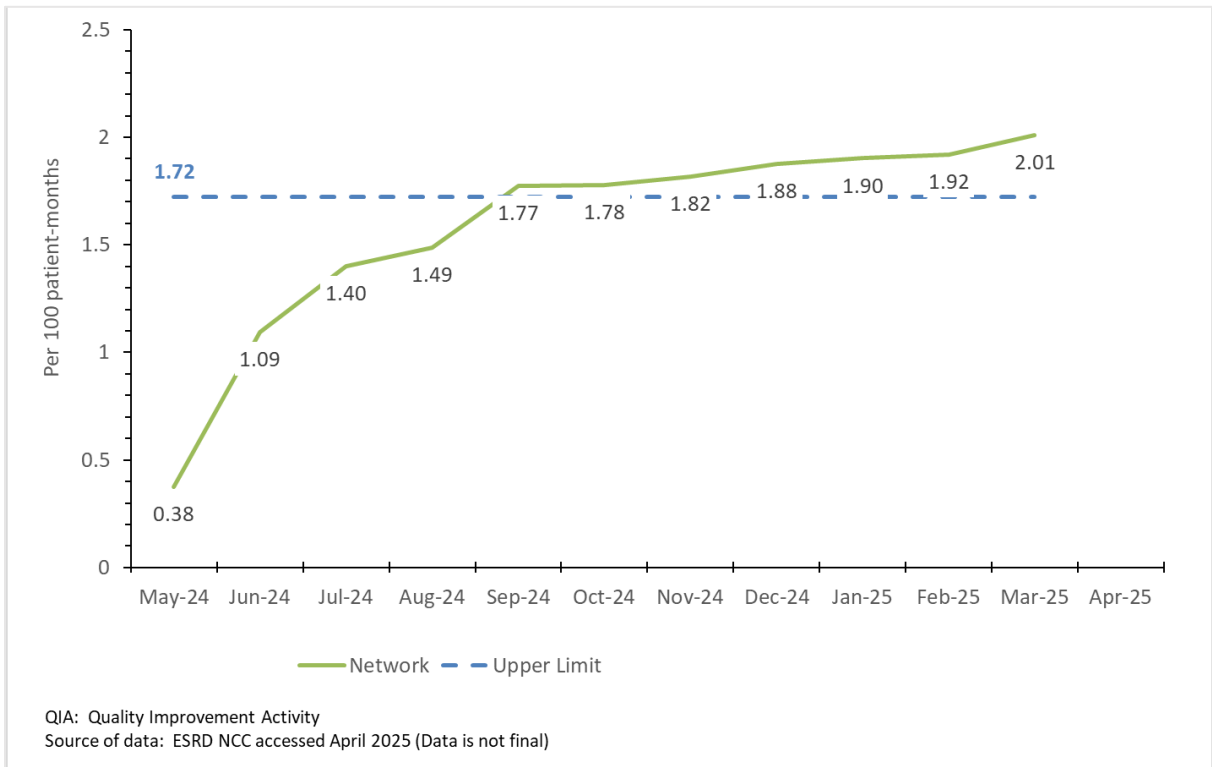
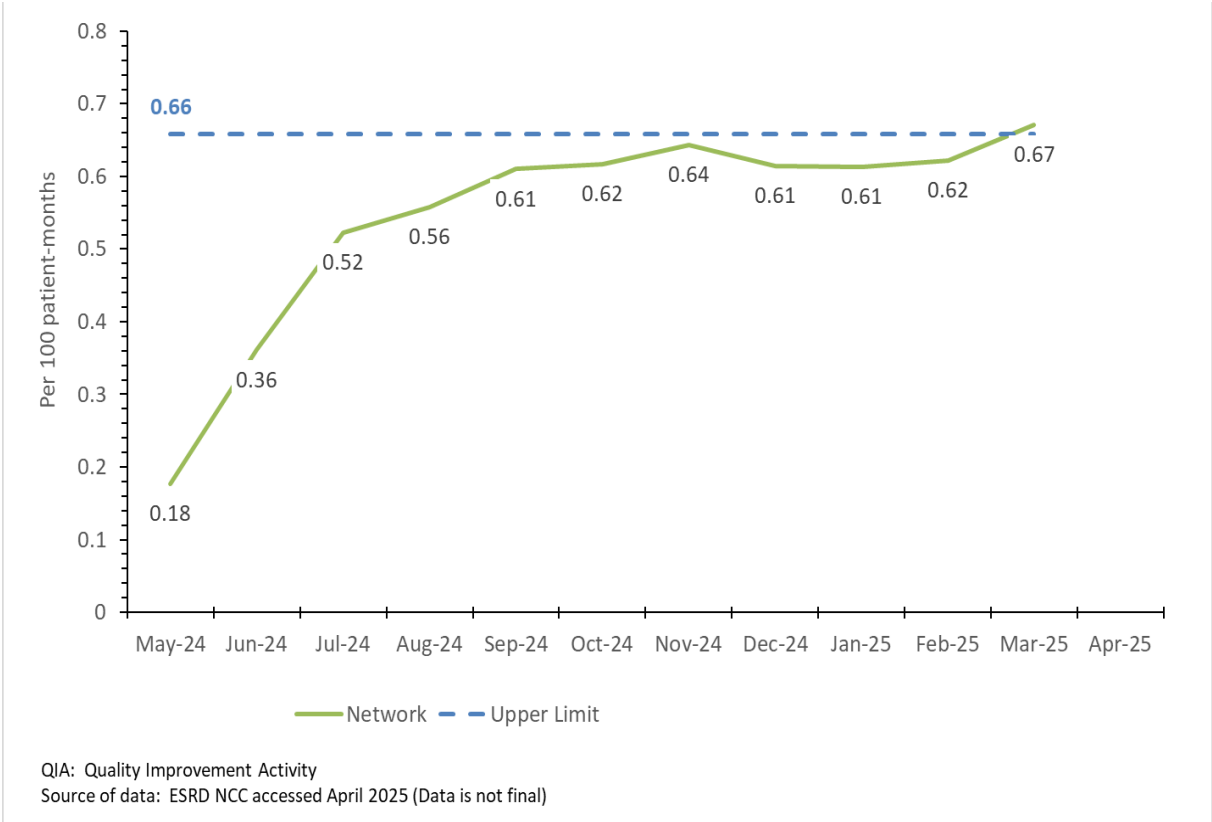


Chart S: Rate of Outpatient ED Visits per 100 Patient-Months May 2024–March 2025





ESRD Network Grievance and Access-to-Care Data

Grievances

The Network responds to grievances filed by or on behalf of ESRD patients in its service area. Grievances may focus on staff issues, quality-of-care issues, and/or environmental issues and fall under several categories, including clinical area of concern, general grievance, and immediate advocacy. The Network addresses immediate advocacy grievances by contacting the facility to resolve an issue within seven business days. General grievances, in which the Network addresses more complex non-quality-of-care issues, are addressed over a 60-day period. Quality-of-care grievances include more complex clinically related grievances and are addressed through records review. From May 2024 to March 2025, 14.90 percent of contacts to the Network were for grievances. (See Chart T) This includes 8.10 percent for immediate advocacy, 2.70 percent for clinical areas of concern, and 4.10 percent for general grievances.

Facility Concerns

In addition to grievances, the Network also responded to facility concerns. Such concerns accounted for 45.90 percent of all contacts to the Network for May 2024–March 2025. (See Chart T) Facility concerns included contacts received from ESRD facilities and providers related to managing difficult patient situations, requests for technical assistance, and other concerns.

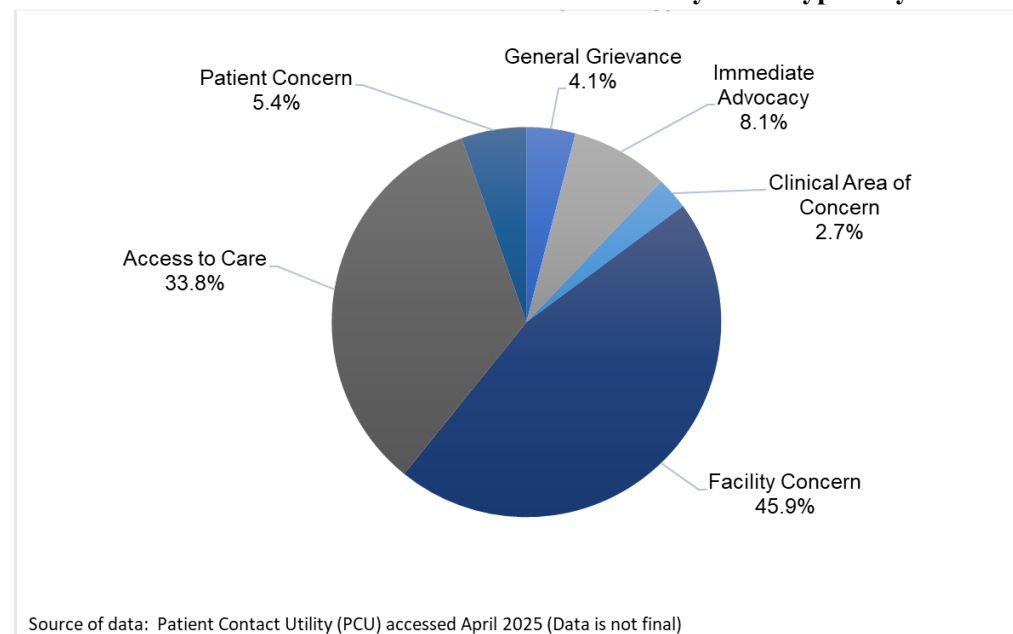
Patient Concerns

Patient concerns are general concerns or questions that patients contact the Network to discuss but are not formal complaints they want the Network to address with a facility. Patient concerns accounted for 5.40 percent of contacts to the Network from May 2024 to April 2025. (See Chart T)

Access-to-Care Issues

The Network works with facilities and advocates for patients to avert potential access-to-care issues whenever possible. Access-to-care concerns include patients at risk for involuntary discharge (IVD) or involuntary transfer (IVT) and patients who have not been able to permanently establish themselves with an outpatient dialysis facility. Access-to-care issues accounted for 33.80 percent of contacts to the Network from May 2024 to March 2025. (See Chart T)

Chart T: Percent of Grievances and Non-Grievances by Case Type May 2024–March 2025





ESRD Network Recommendations

Recommendations for Sanction

Section 1881(c) of the Social Security Act states that the ESRD Network can recommend to CMS the imposition of a sanction when an ESRD provider is not cooperating in achieving Network goals. The federal regulations that implement this statute are found in 42 CFR §405.2181.

The Network maintained a cooperative and collaborative partnership with ESRD providers in all activities in 2024. The Network regularly interacted with facilities regarding QIAs and projects, patient grievances, data reporting, and the provision of technical assistance and education.

In 2024, the Network did not identify any facilities that warranted a recommendation for sanctions.

Recommendations to CMS for Additional Services or Facilities

The Network recommends additional support of in-center hemodialysis self-training, including the creation of a change package, but does not have any recommendations to CMS for additional facilities in its service area.

ESRD Network Significant Emergency Preparedness Intervention

ESRD Network 15 is tasked with providing support to dialysis facilities related to emergency preparedness, planning, and response. The Network conducts a risk assessment and submits an emergency plan annually to CMS. The Network works closely with the Kidney Community Emergency Response (KCER) Program, healthcare coalitions, state and local emergency response partners, and other stakeholders to ensure patients have access to dialysis before and after an emergency event.

The Network issues weather preparedness alerts to facilities in the affected areas. The Network collects facility information related to planned closures prior to an event and then monitors and tracks the open and closed status of facilities and the location of patients during the response. Resources regarding disaster preparedness and response are provided to patients and staff via email to all facilities and discussed during technical assistance calls when facilities contact the Network's toll-free helpline.

Below are the emergency events Network 15 responded to during 2024:

March 2024

- **Colorado (CO) Winter Weather**—A winter storm impacted parts of CO bringing snow and ice on March 13–14, 2024. The Network monitored the storm and sent weather alerts to facilities. No issues were reported.

June 2024

New Mexico (NM) Salt and South Fork Fires—The Salt and South Fork fires started near the Ruidoso area of NM on June 17, 2024. The Network reached out to the one facility that was near the impact zone, but it reported no direct issues from the fires. The facility reported that two patients had to evacuate their homes and were able to receive dialysis at nearby facilities. Both fires were fully contained by July 15, 2024.

July 2024

CO Wildfires—The Quarry and Alexander Mountain wildfires started in the foothills outside of Denver, CO on July 30, 2024. One facility near the Quarry fire installed a commercial air purifier to help mitigate smoke in the area. The facility remained open, and no patient issues were reported.

September 2024

Nevada (NV) Davis Wildfire—The Davis wildfire started approximately one mile south of Reno, NV on September 7, 2024. The Network monitored evacuation orders and contacted the seven facilities in the area for ongoing status updates. The facilities remained open, and no patient issues were reported.

October 2024

Wyoming (WY) Wildfires—The Elk and Pack Trail wildfires started in Sheridan and Fremont counties of WY on October 1, 2024. The Network contacted the two closest facilities, and they reported no impacts.

Acronym List Appendix

This appendix contains an [acronym list](#) created by the Kidney Patient Advisory Council (KPAC) of the National Forum of ESRD Networks. The Network is grateful to the KPAC for creating this list of acronyms to assist patients and stakeholders in improving the annual report's readability.