Gaming and Effort in Performance Pay*

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Abstract

Health insurers increasingly tie payments to providers' quality of care. Although designed to elicit more effort from providers, some providers may game the system by avoiding patients who would cause their quality scores to fall. We use annual variation in the criteria for Medicare's Quality Incentive Program in dialysis to distinguish strategic patient dropping from higher-quality care. Patients who would reduce their facilities' performance scores are 14.3–71.5% more likely to switch facilities, often to ones that suggest the move was involuntary, while under certain conditions facilities exert more effort to improve their scores by providing better care.

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1 Introduction

Health insurers increasingly tie payments to providers' quality of care. Although designed to give providers an incentive to exert more effort in caring for patients, pay-forperformance reimbursement schemes may inadvertently spur providers to avoid treating patients who would hurt their overall performance scores. Such gaming of quality benchmarks not only undermines the integrity of pay-for-performance systems, it may also harm patients by disrupting their care and forcing them to seek out less-preferred providers. In this paper, we study Medicare's End-Stage Renal Disease Quality Incentive Program (ESRD QIP) in dialysis to show directly how pay-for-performance models induce both effort and gaming among providers.

Medicare started the QIP in 2012 following its move to a prospective payment system for dialysis. Before then, Medicare had used a hybrid model that paid facilities a fixed reimbursement for each dialysis session and a fee-for-service reimbursement for any injectable drugs administered during treatment. Although excessive doses of EPOGEN and other separately billable drugs had prompted the payment reform [\(Eliason et al., 2023\)](#page-18-0), policymakers raised new concerns that facilities might start undertreating patients once bundled payments made injectable drugs a marginal cost rather than a source of profit. In response, Medicare began assigning facilities an annual quality score based on a set of standardized metrics related to their patients' care, such as hemoglobin levels and dialysis adequacy, while cutting reimbursements for facilities falling below certain benchmarks by up to 2%.

The metrics used to construct facilities' quality scores have been continually updated since the QIP's inception, which allows us to cleanly identify how providers respond to performance pay: the annual changes in performance measures generate substantial variation in how a given patient influences their facility's scores even if that patient's underlying characteristics remain unchanged. As a result, some patients would suddenly cause their facilities' reimbursements to fall if they remain below the QIP's standards, and we can use these exogenous shocks to isolate the different forms of gaming and effort facilities use in response to Medicare's incentives. We find that patients become much more likely to switch facilities when their characteristics would trigger a penalty in a particular year, in keeping with insiders' claims that facilities involuntarily discharge less-desirable patients [\(Fields, 2010;](#page-18-1) [Mueller, 2023\)](#page-19-0). Along some dimensions, however, we find that facilities exert more effort to improve their care when poor performance on that specific measure would be penalized. In short, performance pay leads to both real improvements in quality as well as strategic patient dropping to game Medicare's quality scores.

Two performance measures in particular illustrate this phenomenon. Dialysis facilities must regularly track the amount of waste and toxins they clear from a patient's blood, with adequacy measured by either the urea reduction ratio (URR) or Kt/V. These two measures are closely, but not perfectly, related: patients with an identical URR might end up having very different measures of Kt/V, primarily due to differences in body weight. Initially, the QIP used URR as its performance measure for dialysis adequacy, but then switched to Kt/V in the program's fourth year and sparked an abrupt change among a select group of patients. When the QIP penalized poor URR scores, patients with bad URR and good Kt/V were more likely to switch facilities than those with good URR and bad Kt/V ; when the QIP penalized poor Kt/V instead, the pattern flipped.

Facilities' incentives for dropping penalty-inducing patients with poor adequacy scores are clear-cut. A facility with the average load of 50 eligible patients and at the bottom decile of QIP scores could move from the worst possible score to the best by dropping just three patients. Similar to our example of dialysis adequacy, we use Medicare claims data to detect whether facilities engage in such strategic behavior across all QIP criteria by calculating a penalty score for each patient based on how much their diagnostic measures would reduce their facility's QIP score in a given year. Using this approach, we find in our most-conservative specification that a patient who does not satisfy any of Medicare's QIP standards is 14.3% more likely to switch facilities than a patient who satisfies them all. We also find that penalty-inducing patients are more likely to switch facilities after being hospitalized — a result consistent with facilities selectively refusing to take back patients who might harm their QIP scores — and that penalty-inducing patients are not more likely to switch to more-convenient or higher-quality facilities, suggesting their move was unlikely to be voluntary.

Along with strategically dropping patients, facilities can also improve their QIP scores by exerting more effort to provide better care. To improve adequacy scores, for example, a facility could increase the amount of time their patients spend being dialyzed, although doing so comes with the opportunity cost of not using the dialysis station to treat another patient; the facility must then weigh the financial penalty of the QIP against the forgone payment from not treating an additional patient. For the QIP measures where we have data directly related to effort, we find facilities exert more effort to improve their quality of care when the incentives from the QIP do not conflict with other profit-maximizing activities. During the years in which the QIP penalized facilities for having patients with low hemoglobin levels, for example, facilities administered higher doses of the fee-for-service drugs that stimulate red blood cell production, allowing them to avoid the reimbursement cut from falling short of the QIP's benchmark while at the same time earning higher profits from the separately billable drugs. Similarly, when the QIP penalized hypercalcemia, facilities exerted more effort to reduce calcium levels by prescribing more cinacalcet, a drug covered under Part D for which the patient, rather than the facility, bears the cost. When the QIP's incentives conflict with facilities' other profit motives, however, like with run times for dialysis adequacy or anti-anemia drugs for transfusions, we do not find the same unambiguous increase in effort.

The growing use of pay-for-performance schemes in health care has prompted a recent literature studying their effects. [Norton et al.](#page-19-1) [\(2018\)](#page-19-1), for instance, show that the Hospital Value-Based Purchasing Program spurred hospitals to improve their performance in the areas where they have the highest marginal incentives to do so, while [Li and Norton](#page-19-2) [\(2019\)](#page-19-2) find that measures in the Home Health Value-Based Purchasing Program improved by approximately 1% as agencies manipulated their coding of patients in ways that inflated their performance. Also related to gaming, [Lisi et al.](#page-19-3) [\(2020\)](#page-19-3) suggest that pay-for-performance schemes that reward low mortality or readmission rates can either weaken or strengthen a hospital's incentive to provide high-quality care, depending on selection bias.

Perhaps most closely related to our paper, [Gupta](#page-18-2) [\(2021\)](#page-18-2) uses Medicare claims data to study the Hospital Readmissions Reduction Program (HRRP), a policy enacted a decade ago that penalizes hospitals with high readmission rates. Gupta finds that hospitals' responses to the penalty account for two-thirds of the decrease in readmissions over the study period in addition to a decrease in mortality for heart attack patients. Half of these gains come from quality improvements and the remainder from differences in the mix of returning patients.

Our paper builds on and complements these existing studies in at least two important ways. First, the QIP comprises a rich set of measures that varies over time, allowing us to use the changes in how Medicare calculates a facility's QIP score to cleanly identify what happens to patients when their specific characteristics make them more likely to trigger a penalty. Second, the detailed claims data available for Medicare's dialysis patients, along with the chronic nature of the condition, allow us to observe the direct ways in which facilities change their effort for the same patient in response to performance pay as opposed to inferring them from a facility's aggregate spending measures.

Our paper also contributes to the broader literature on cream skimming and patient dropping within health care. Although policymakers often risk-adjust reimbursements to dampen the incentive for providers to cherry-pick lucrative patients, some may game the payment scheme by choosing patients with poorly calibrated risk scores [\(Geruso et al., 2019;](#page-18-3) [Brown et al., 2014\)](#page-17-0). Alternatively, high-powered bonuses to decrease total treatment costs can prompt providers to select healthier patients and identify low-cost patients within riskadjustment groups [\(Alexander, 2020\)](#page-17-1), and savvy providers routinely find ways to target the most-profitable patients following a payment change [\(Dafny, 2005;](#page-17-2) [Eliason et al., 2018;](#page-17-3) [Einav et al., 2018\)](#page-17-4). Similar behavior has been found when providers face capacity constraints [\(Agarwal and Somaini, 2022;](#page-17-5) [Yang et al., 2020;](#page-20-0) [Hackmann et al., 2020;](#page-18-4) [Gandhi, 2019\)](#page-18-5) and

using randomized field experiments [\(Werbeck et al., 2021\)](#page-19-4).

Finally, our paper contributes to the literature focused specifically on the impact of the QIP in dialysis [\(Ajmal et al., 2020;](#page-17-6) [Fink et al., 2002;](#page-18-6) [Ajmal et al., 2019;](#page-17-7) [Saunders et al., 2017\)](#page-19-5), which has largely criticized the program for excluding measures of patient satisfaction. Along with the contemporaneous work of [Kepler et al.](#page-18-7) (2022) on facilities' location decisions, we believe our paper is the first to investigate the impact of the QIP on the strategic behavior of facilities, including patient dropping and investments in quality to improve health outcomes.

2 Institutional Details and Data

2.1 Kidney Failure and the Dialysis Industry

Kidneys filter wastes and toxins from the blood and stimulate red blood cell production. For patients experiencing end-stage renal disease, however, the kidneys no longer adequately perform these functions, necessitating either a kidney transplant or dialysis. The most common form of dialysis, hemodialysis, uses a machine to clean a patient's blood outside their body, either at their home or a medical facility. Nearly all ESRD patients also receive a cocktail of drugs to address common comorbid conditions, such as anemia and hypercalcemia.

Most ESRD patients receive dialysis at one of the more than 7,000 dedicated dialysis facilities across the country, where they typically go three times per week for treatment that lasts three to four hours each visit. These facilities are run by a mix of for-profit and non-profit firms, with the two largest for-profit chains, DaVita and Fresenius, controlling over 60% of facilities and earning 90% of the industry's revenue [\(United States Renal Data](#page-19-6) [System, 2014;](#page-19-6) [Baker, 2019;](#page-17-8) [Eliason et al., 2020\)](#page-18-8).

2.2 Medicare Payment Reform

Since 1972, Medicare has extended full benefits to all patients with ESRD, regardless of age, paying for outpatient dialysis and anemia treatment under Part B.[1](#page-6-0) From the early 1980s to 2010, Medicare paid providers a flat rate for each dialysis session and a fee-forservice reimbursement for any injectable drugs administered during treatment. Concerns that the distortionary incentives from fee-for-service reimbursements resulted in excessive harm to patients and costs for Medicare motivated policymakers to include ESRD payment reform as part of the Medicare Improvements for Patients and Providers Act (MIPPA) in 2008, which mandated the bundling of dialysis services and all injectable drugs and biologics used in the treatment of ESRD into a single prospective payment, starting in 2011.

To offset the incentives for providers to reduce costs by providing lower-quality care, MIPPA also called for the development of the QIP, the nation's first federally mandated pay-for-performance program, which reduces reimbursements to low-performing facilities by up to 2%. To determine and assess these penalties, Medicare follows a predetermined sequence comprising a historical "comparison year" that provides a baseline for measuring quality improvements, a "performance year" in which the facility's quality is evaluated, and a "payment year" two years after the performance period when a low-performing facility receives its penalty. The timing and duration of these periods have varied throughout the program's history, which we outline in Online Appendix [A.](#page-26-0)[2](#page-6-1)

To calculate a facility's total performance score, Medicare first compares the share of patients at the facility who satisfy a given standard in the performance year to either a

¹Those enrolled in an employer group health plan when diagnosed with ESRD retain their commercial insurance as a primary payer for 33 months at rates seven to eight times higher than Medicare's, during which time Medicare acts as a secondary payer [\(League et al., 2022\)](#page-19-7).

²As shown in Online Appendix Figure [A2,](#page-27-0) the first two years of the program use a comparison period for the national benchmark two years before the performance year, whereas each facility is compared to its own performance in 2007 for both years. In the third year of the QIP, the national benchmark and each facility's own performance benchmarks were constructed using performance from July 2010 to June 2011. For all subsequent years, the national comparison period is the year before the self-comparison period, which is the year before the performance period. In every year, new QIP measures are finalized with no more than two months remaining in the comparison period.

national facility-level average or the facility's own past performance in the comparison year, with the facility receiving the greater of the two scores; the scores for each measure are then aggregated based on their respective weights in that year's QIP to form a facility's total performance score. Facilities with a score just below the administratively set threshold have their payments reduced by 0.5% and those far below by 2%, with facilities in between facing 1% or 1.5% reductions, as outlined in Online Appendix [A.](#page-26-0)

Although the basic scoring mechanism has remained constant since the introduction of the QIP, the performance measures used to construct the scores have changed over time along with the respective weights placed on them in calculating the final score, as shown in Figure [1a.](#page-21-0) In the first performance year, Medicare used three quality measures related to clinical outcomes: the percentage of patients with average hemoglobin values above 12, the percentage with average hemoglobin values below 10, and the percentage of patients with a URR below 65%. Medicare then stopped penalizing hemoglobin levels below 10 after the first year following a black box warning from the FDA that changed the standard of care for anemic dialysis patients [\(Eliason et al., 2023\)](#page-18-0), and over time Medicare has similarly updated its measures and weights in response to new medical guidelines and the desire to provide more transparency for patients.

As will be important for our identification strategy below, Figure [1b](#page-21-0) shows how the continual updating of QIP criteria generates substantial variation in the likelihood a patient would trigger a penalty for their facility. Because the new rules are typically proposed and finalized very close to the performance period — or even during the performance period for the first years of QIP — many patients suddenly cause their facilities' scores to fall solely due to exogenous changes in what Medicare evaluates rather than due to changes in their underlying attributes, whereas other patients suddenly become compliant on all measures and no longer trigger a penalty.

Potentially reflecting facilities' strategic responses to the QIP, the annual variation in patients' quality scores in Figure [1b](#page-21-0) coincides with an elevated rate of switching for penaltyinducing patients in Figure [1c,](#page-21-0) a correlation consistent with insiders' allegations that facilities deliberately cut ties with patients who might tarnish their performance record. As recounted by Dialysis Advocates founder Arlene Mullin, "I always get a flood of calls from patients toward the end of the year, when clinics prepare for their quality ratings and start terminating unhealthy patients who would lower their overall score," while concerned nephrologists have accused facilities of provoking low-scoring patients into angry outbursts as pretext for discharging them [\(Mueller, 2023\)](#page-19-0). Once forced out, these patients experience disrupted care along with other hardships, such as an involuntarily discharged DaVita patient who had to receive dialysis in the emergency room because the closest non-DaVita facility was more than 50 miles away in another state [\(Fields, 2010\)](#page-18-1).

Although anecdotes like the above suggest that facilities target undesirable patients for involuntary discharges, the multifaceted nature of the QIP and the timing of its comparison periods make it unlikely that a facility could precisely predict how a given patient would impact its performance by the end of the year and then pinpoint exactly how to allocate effort and manipulate patient loads to achieve a specific QIP score. Instead, we show below that facilities appear to use heuristics to avoid treating patients with certain characteristics and to broadly adjust effort along certain dimensions rather than solve a complex dynamic optimization problem to maximize profits like providers do in other settings with simpler targets, such as patients' lengths of stay at long-term acute care hospitals [\(Eliason et al.,](#page-17-3) [2018\)](#page-17-3) and nursing homes [\(Hackmann et al., 2020\)](#page-18-4). As such, we use the elevated rate of switching for penalty-inducing patients as the motivation for a research design focused on the most relevant proxies for gaming and effort consistent with this strategic behavior.

2.3 Data

The main data for our analysis come from the U.S. Renal Data System, which collects and manages data from a variety of sources related to ESRD patients and their health

care providers.[3](#page-9-0) Included in these data are Medicare claims, treatment histories, patient attributes, and annual facility surveys. In addition, CMS Form 2728, known as the Medical Evidence Form, provides rich information on the health and clinical attributes of patients when they begin dialysis. Our sample includes 1,018,413 patients and 7,770 facilities, with summary statistics appearing in Online Appendix [B.](#page-28-0)

To identify strategic patient dropping, we begin by classifying patients who switch facilities. On average, patients rarely do so — only about 0.8% in a given month — primarily because they must receive dialysis three times per week and strongly prefer going to a facility close to their homes. To avoid including temporary switches in our analysis (e.g., if a patient receives dialysis while on vacation), we use only those switches that occur within a patient's hospital referral region for which the patient does not return to their original facility within the following six months. Because Medicare does not release data on the reason a patient switches to a new facility, we use a proxy for involuntary switches based on whether a patient's new facility is farther away or has worse outcomes, as such moves would seem to be strictly dominated based on previous work that found patients demonstrate a revealed preference for closer, higher-quality facilities [\(Eliason, 2022\)](#page-17-9).

We use the QIP's scoring rules to determine whether a patient increases the likelihood that a facility receives a payment reduction in the relevant performance year. Specifically, we construct a penalty score for each patient based on the number of measures for which they fall short of the QIP standard as well as the relative weights placed on those measures. To do this, we sum a series of indicator functions for whether the patient fell short of each QIP standard in effect at time t , weighted by the respective QIP weights and scaled to span zero to one. Once again, Figure [1b](#page-21-0) shows how the share of patients who failed to meet at least one benchmark — and who therefore have a penalty score greater than zero — has evolved over the years in our data, with the large changes in the share of penalty-inducing patients from year to year demonstrating how changes in QIP performance measures shift patients

 3 For a more thorough description of USRDS, please see the *Researcher's Guide to the USRDS System* at USRDS.org [\(United States Renal Data System, 2020\)](#page-19-8).

in and out of penalty-inducing status. Underpinning these annual changes, Table [1](#page-22-0) provides further summary statistics for the evolution of each QIP measure, where the bold green cells highlight the years in which that measure appeared in the QIP. In general, dialysis facilities' quality of care has improved over time, with the share of patients failing to meet the QIP standards for most measures falling after being included in the QIP. Table [1](#page-22-0) also shows that multiple measures have a material impact on facilities' scores, as opposed to a single measure being the sole determinant of patients inducing a penalty in a given year.

3 Empirical Analysis

We use Medicare's annual changes in QIP criteria to estimate the causal effect of pay-forperformance measures on the likelihood that patients switch facilities and facilities exert more effort. As shown in Figure [1c,](#page-21-0) penalty-inducing patients are more likely to switch facilities relative to those who do not induce penalties, which motivates our main specification,

(1)
$$
Y_{ijt} = \beta I_{\text{Penalty},t} \left[Measures_{it}\right] + \alpha_1 Measures_{it} + \alpha_2 Measures_i^{Base} + \alpha_3 X_{ijt} + \varepsilon_{ijt},
$$

where Y_{ijt} is the outcome of interest for patient i at facility j in month t, and X_{ijt} includes a host of facility and patient controls in addition to facility and year-month fixed effects.

The key outcomes we study are the probability that a patient switches facilities, the characteristics of that switch (i.e., whether the new facility is farther away or lower quality), and the amount of effort exerted by facilities to treat the patient. To capture how payfor-performance affects facilities' decisions, we also include $I_{Penalty,t}[Measure s_{it}]$, a function that maps all of the patient's performance measures to their penalty score based on the QIP criteria in effect at time t.

The main parameter of interest, β , gives the differential outcomes for patients who potentially induce penalties for their facilities under the QIP. The key challenge in identifying β is that penalty-inducing patients may have different facility-switching behavior or receive different care due to differences in their underlying health rather than differences in facilities' financial incentives to treat them. We overcome these challenges by including (i) a rich set of patient and facility characteristics that allow us to compare observably similar patients, (ii) time fixed effects that allow us to compare the outcomes for patients who have different penalty scores in the same month, uncontaminated by universal changes in outcomes over time, and (iii) facility fixed effects that allow us to capture any time-invariant, unobserved factors that might make a facility more predisposed to exert different levels of effort or more likely to have patients who switch, such as those operating in areas with a more vulnerable population.

At the same time, penalty-inducing patients may have different outcomes due to unobserved differences not captured by these controls. For example, if patients who disregard medical advice are also more likely to switch facilities voluntarily, then these patients may induce a correlation between negative health outcomes that trigger a penalty and their decision to switch facilities, but for reasons unrelated to performance pay. The detailed claims data, repeated patient encounters, and timing of QIP changes allow us to overcome these threats to identification as well.

First, we control for patients' average baseline characteristics on all QIP performance measures during a pre-period spanning their first six months on dialysis, which means we compare patients who begin dialysis with the same health status but who may have different penalty scores depending on which measures appear in the QIP in different years. Patients who start dialysis with the same potential to induce penalties — that is, patients who initiate dialysis with the same baseline characteristics but before facilities' strategic behavior could affect their health outcomes — will differ in their subsequent penalty scores as their health statuses evolve and different measures enter and exit the QIP. As an example, patients who have low hemoglobin levels when they begin dialysis will have different penalty scores depending on whether they started in 2010–2011, when low hemoglobin was included in the QIP, or after 2011, when that measure was no longer one of the quality standards.

For an even more conservative approach, in some specifications we also control for patients' contemporary health characteristics that, depending on the QIP criteria in effect at the time, determine their penalty scores. Directly controlling for these characteristics in the regression means we identify the impact of the penalty score using only changes in which criteria are being evaluated by Medicare in that year rather than by comparing patients with different health statuses. This strategy is similar in spirit to a difference-in-differences analysis that compares the change in switching behavior after a QIP measure is introduced across patients who do or do not satisfy the standard. Including contemporary measures in this way may understate the effect of strategic patient dropping, however, as any additional effort exerted by facilities in response to the QIP may improve a patient's outcomes to the point where it is no longer necessary to cut ties with them.[4](#page-12-0)

Returning to the example of dialysis adequacy, Figure [1d](#page-21-0) clearly demonstrates our identification strategy. Prior to 2013, Medicare used URR to calculate facilities' QIP scores for dialysis adequacy, and patients with URR values below the threshold of 65% during this time were more likely to switch facilities than those who achieved the QIP standard. Medicare then replaced URR with Kt/V in 2013, and despite clinicians using both measures to assess the adequacy of a patient's treatment, the slight differences between them mean that some patients meet the QIP threshold for one measure but not the other. Following the QIP update, the probability of switching facilities increased for patients who met the old standard but failed to achieve the new one (i.e., they had good URR but low Kt/V), whereas patients who satisfied the new standard but who would have failed before (i.e., they had good Kt/V but low URR) suddenly began switching less often.

Moving beyond the case study of dialysis adequacy, Table [2](#page-23-0) presents the results of estimating equation [\(1\)](#page-10-0) using the full set of QIP measures. We find across all specifications that penalty-inducing patients are more likely to switch facilities. In column (1), patients with the highest penalty scores are 71.5% more likely to switch facilities than patients with

⁴Moreover, the contemporary health measures that factor into the QIP may themselves be endogenous to the policy. In Table [2,](#page-23-0) we estimate regressions both with and without these controls to assess this possibility.

the lowest penalty scores, while a more conservative specification that includes contemporary values for QIP measures in column (2) shows an elevated switching rate of 14.3% .^{[5](#page-13-0)} Alternatively, a one standard deviation increase in a patient's penalty score is associated with a 10.0% higher probability of switching in column (1) and a 2.0% higher probability in column (2). Restricting the sample to recently hospitalized patients in columns (3) and (4), we again find that patients with the highest penalty scores are more likely to switch facilities, which ranges from 19.4–51.9% depending on the specification. As hospitalizations represent an expedient way for facilities to selectively cut ties with patients who might harm their QIP scores, this result is again consistent with strategic patient dropping.

Despite the elevated switching rates among penalty-inducing patients in the regressions above, our results likely understate the extent of strategic patient dropping in two important ways. First, we include all facilities in our analysis even though many are not at risk of being penalized (i.e., a marginal patient would not trigger a payment reduction) and would therefore not find it worthwhile to involuntary discharge a patient even if they fail to meet the QIP's standards. Second, facilities may pressure certain penalty-inducing patients to leave, but we only observe when doing so ultimately results in a switch.

To determine whether the switches we observe are likely to be involuntary, we compare the mortality, hospitalization, and infection rates of the facility a patient leaves with their new facility's, as well as whether the new facility is closer to the patient's home, with the intuition being that a patient would not willingly move to a lower-quality or farther-away facility. Table [3](#page-24-0) presents the results of estimating equation [\(1\)](#page-10-0) restricted to a sample consisting solely of patients who switched and replacing Y_{ijt} with the difference in the respective outcome variables between the new facility and the original one. Compared to an average annual mortality rate of 8%, column (1) suggests that patients with the highest penalty scores move

⁵Including contemporary measures in column (2) dampens the effect of penalty scores on switching for two reasons. First, by adding contemporary QIP measures among the controls, we identify the impact of being penalty-inducing using only changes in which criteria are being evaluated rather than by comparing patients with different contemporary health statuses. Second, the observations we drop due to missing contemporary values have higher penalty scores and worse baseline QIP values for most measures.

to facilities with a 5.9% higher mortality rate than patients with the lowest scores. Although the difference becomes statistically insignificant when we add contemporary values in column (2), we can still rule out the alternative explanation that patients with higher penalty scores are systematically switching to new facilities in order to receive better care. We find similar patterns for our other two measures of quality, infection and hospitalization rates, while column (7) shows that patients with higher penalty scores travel an additional mile after switching compared to a baseline of 11 miles.

In addition to dropping penalty-inducing patients, facilities can also avoid penalties by exerting more effort to provide better care. Table [4](#page-25-0) shows the extent to which facilities employ this strategy, where the dependent variable of each column is a specific type of effort or activity that the facility can undertake to help satisfy an associated QIP measure and the explanatory variable 1{Penalty-Inducing} becomes one if the associated QIP measure is not satisfied. To circumvent issues that would arise from facilities' simultaneous attempts to improve care and drop patients, this specification uses October–December of the previous year to construct a patient's QIP status for each measure. For the low hemoglobin standard, for example, 1{Penalty-Inducing} is equal to one in 2010 if a given patient has a low hemoglobin reading from October 2009 through December 2009, and zero otherwise, while the variable 1 {Post} equals one after the measure has been added to the QIP.

We find that effort increases for those measures for which avoiding QIP penalties aligns with other profit-maximizing activities: EPOGEN and iron doses increase for patients with low hemoglobin levels at a time when fee-for-service reimbursements made these higher doses profitable for facilities to administer; EPOGEN and iron doses decrease for patients with high hemoglobin levels at a time when prospective payments made these lower doses a cost savings for facilities; and cinacalcet doses increase for patients with high calcium readings at a time when Medicare's payment policies made these costs the patient's responsibility rather than the facility's. In short, facilities exert more effort to avoid penalties when they can do so in ways that do not otherwise reduce their profits.

We do not find the same unambiguous increase in effort when facilities face a tradeoff between avoiding QIP penalties and incurring additional costs. For inadequate Kt/V scores, increasing treatment time decreases the likelihood of substandard Kt/V levels, but doing so means the facility cannot treat another patient during that time to receive another prospective payment from Medicare, a clear quality-quantity tradeoff [\(Grieco and McDe](#page-18-9)[vitt, 2017\)](#page-18-9). Reflecting this opportunity cost, treatment times do not increase after Medicare added Kt/V to the QIP criteria, with the switching trends in Figure [1d](#page-21-0) suggesting that facilities instead prefer to game the system by dropping poorly performing patients rather than incur additional costs to improve their quality of care. The decline in EPOGEN doses for penalty-inducing patients after transfusions enter the QIP similarly reflects this logic: higher EPOGEN doses decrease the risk of patients needing transfusions and triggering a penalty, but the QIP payment reduction is likely to be much less than the cost of administering such large doses of an expensive drug across a wide swath of patients. Iron replacement drugs, on the other hand, are a cost-effective way to stimulate red blood cell production and avoid the penalties for transfusions under the QIP, and we find that these doses do increase for transfusion patients when the QIP provides an incentive for facilities to do so.

Finally, we use our results on gaming and effort to approximate the aggregate effects of the QIP on patients. For strategic patient dropping, we multiply the average penalty score from 2010–2017 by our estimate of how much it impacts the probability a patient switches facilities along with the total number of patient-months throughout the period. Based on this calculation, the QIP caused an additional 163 switches per year for a total of 1,306. For effort, we perform the same calculation as for gaming but restricted to those measures for which we determined the QIP prompted facilities to improve the care of penalty-inducing patients. In the first year that each measure was added to the QIP, we find that EPOGEN and iron doses increased for low hemoglobin patients by 400 million and 975,000 IUs, respectively, and decreased by 1.0 billion and 1.3 million IUs for those with high hemoglobin. In addition, iron doses for patients who received transfusions rose by 179,356 IUs and the number of patient-months that hypercalcemic patients received cincacalet rose by 4,809, an increase of 25.7% relative to the year before. In short, the QIP induced both gaming and effort among facilities, but their responsiveness varied considerably across the different measures and associated financial incentives.

4 Conclusion

Patients who would trigger a reimbursement penalty are much more likely to switch facilities after the introduction of pay-for-performance in dialysis. The switches appear to be involuntary, as penalty-inducing patients are more likely to move to worse facilities that are farther away from their homes.

One reason the QIP leads to gaming by facilities is misaligned financial incentives. Facilities can ensure adequate Kt/V by increasing treatment times, for instance, but doing so comes with the opportunity cost of treating fewer patients and receiving commensurately lower prospective payments. In such cases, facilities find it more profitable to drop patients who would trigger QIP penalties rather than invest more effort to improve their outcomes. When facilities do not face a tradeoff between meeting the QIP's standards and maximizing their profits, they increase effort in ways that lead to higher-quality care.

Our findings highlight the need for Medicare and other health insurers to account for providers' strategic behavior when designing pay-for-performance reimbursement schemes. When providers can manipulate their scores through strategically dropping patients, the disruption to patient care may outweigh the benefits that result from the increase in effort. Penalizing facilities for patients who switch facilities may be one possible remedy, as would a look-back period that assigns patients to all facilities that recently provided care to them.

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Tables & Figures

Figure 1: QIP Criteria and Switching

Notes: Subfigure (a) reports the set of QIP criteria active in each performance year and the weight each measure receives in the overall facility score. Subfigure (b) reports the percentage of penalty-inducing patientmonths each year. Subfigure (c) reports the probability of switching facilities in a given patient-month by whether the patient fails to satisfy at least one QIP measure (i.e., is "penalty-inducing"). Subfigure (d) reports the probability of switching facilities by whether the patient satisfies the QIP standard for Kt/V and/or URR. Patient-months with a median URR below 65% have "Low URR," while patient-months with a final Kt/V reading below 1.2 have "Low Kt/V."

January 2012, the earliest date information on Kt/V is available, to December 2017. Column (11) includes observations from May 2012, the earliest date information on calcium is available, to

December 2017.

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	Switch Facilities		Switch Facilities After Hospitalization	
	(1)	(2)	(3)	(4)
Penalty Score	$0.00389***$	$0.000699**$	$0.00529***$	0.00148
	(0.000168)	(0.000244)	(0.000689)	(0.000953)
Patient Controls	Yes	Yes	Yes	Yes
Facility FEs	Yes	Yes	Yes	Yes
Month-Year FEs	Yes	Yes	Yes	Yes
Base Measures	Yes	Yes	Yes	Yes
Contemporary Measures	No	Yes	N _o	Yes
R^2	0.00496	0.00483	0.0157	0.0137
Observations	16,113,581	15,256,031	1,153,032	1,050,044
Mean Dep. Var.	0.00544	0.00490	0.0102	0.00762

Table 2: Switching by Penalty Score

Notes: OLS estimates of equation [\(1\)](#page-10-0). The dependent variable is an indicator variable that takes value 1 if a patient switches facilities in a given month in columns $(1)-(2)$, and whether the switch occurs after a hospitalization in columns $(3)-(4)$. The primary explanatory variable of interest is a patient's contemporary penalty score. An observation is a patient-month. Sample consists of observations from January 2008 to December 2017 for in-center hemodialysis patients between the ages of 18 and 100 with Medicare as their primary payer. The first six months of observations for each patients are removed from the sample. Patient controls include indicator variables for incident comorbidities and characteristics reported on medical evidence forms, including diabetes, hypertension, BMI bin, GFR bin, HGB bin, income bin, high albumin, cancer, drug use, alcoholism, smoking behavior, necessity of assistance, COPD, ASHD, PVD, ischemic heart disease, and congestive heart disease, along with patient race, gender, and cubic functions of age and dialysis tenure. Facility controls include age, HRR, whether the facility is freestanding or hospital-based, and chain ownership status. BMI bin, GFR bin, HGB bin and income bin represent respectively the BMI quintile, GFR quintile, HGB quintile, and the income quintile of the ZIP code of residence for each patient. Additional controls include year-month fixed effects, facility fixed effects, and measures of the patient's health status relative to each measure ever used in the QIP during the patient's first six months in the data. Finally, where indicated, controls also include the patient's contemporary health status relative to each measure ever used in the QIP. More specifically, these controls take the form of indicators for each specific measure which take value 1 if the patient has readings which do not satisfy the QIP rules in the current period. Standard errors clustered by patient are in parentheses. *, ** and *** indicate significance at the 5%, 1% and 0.1%, respectively. Contemporary "Bad Vasc. Access," "Low Kt/V," and "High Calcium" are imputed to equal 0 prior to July 2010, January 2012 and May 2012, respectively. The regressions include indicator variables for the periods in which each of these measures is missing.

which do not satisfy the QIP rules in the current period. Standard errors clustered by patient are in parentheses. $*$, $**$ and $***$ indicate significance at the 5%, 1% and 0.1%, respectively. Contemporary "Bad Vasc. Acces sample. Patient controls include indicator variables for incident comorbidities and characteristics reported on medical evidence forms, including diabetes, hypertension, BMI bin, GFR bin, HGB bin, income bin, high albumin, necessity of assistance, COPD, ASHD, PVD, ischemic heart disease, and congestive heart disease, along with patient race, gender, and cubic functions of age and dialysis tenure. Facility controls include age, HRR, whether the facility is freestanding or hospital-based, and chain ownership status. BMI bin, GFR bin, HGB bin and income bin represent respec and the income quintile of the ZIP code of residence for each patient. Additional controls include year-month fixed effects, facility fixed effects, and measures of the patient's health status relative to each measure ever used in the QIP during the patient's first six months in the data. Finally, where indicated, controls also include the patient's contemporary health status relative to each measure ever used in the QIP. More specifically, these controls take the form of indicators for each specific measure which take value 1 if the patient has readings equal 0 prior to July 2010, January 2012 and May 2012, respectively. The regressions include indicator variables for the periods in which effects, and measures of the patient's health status relative to each measure ever used in the QIP during the patient's first six months in the to the status of the patient's first six months in the status of the patient's significance at the 5%, 1% and 0.1%, respectively. Contemporary "Bad Vasc. Access," "Low Kt/V," and "High Calcium" are imputed to in which the patient switches facilities in the next month. The first six months of observations for each patients are removed from the sample. Patient controls include indicator variables for incident comorbidities and characteristics reported on medical evidence forms, including diabetes, hypertension, BMI bin, GFR bin, HGB bin, income bin, high albumin, cancer, drug use, alcoholism, smoking behavior, necessity of assistance, COPD, ASHD, PVD, ischemic heart disease, and congestive heart disease, along with patient race, gender, and cubic functions of age and dialysis tenure. Facility controls include age, HRR, whether the facility is freestanding or hospital-based, and chain ownership status. BMI bin, GFR bin, HGB bin and income bin represent respectively the BMI quintile, GFR quintile, HGB quintile, and the income quintile of the ZIP code of residence for each patient. Additional controls include year-month fixed effects, facility fixed π the data. Finally, where indicated, controls also include the patient's contemporary health status relative to each measure ever used in the QIP. More specifically, these controls take the form of indicators for each specific measure which take value 1 if the patient has readings which do not satisfy the QIP rules in the current period. Standard errors clustered by patient are in parentheses. *, ** and *** indicate equal 0 prior to July 2010, January 2012 and May 2012, respectively. The regressions include indicator variables for the periods in which each of these measures is missing. each of these measures is missing.

treatment time and calcium levels; and 2011–2017 for transfusion to avoid the confounding effect of the switch from fee-for-service to prospective payments in 2011. The first six months of observations for each patients a along with patient race, gender, and cubic functions of age and dialysis tenure. Facility controls include age, HRR, whether the facility is freestanding or October-December 2009, and 0 otherwise. 1 {Post} is an indicator variable that takes value 1 if the QIP measure is active in a given period. An observation
is a patient-month. Sample consists of observations for in-center from varying time periods: $2008-2010$ for low HGB and high HGB to avoid the confounding effect of the switch from fee-for-service to prospective payments in 2011; 2012-2017 for high calcium and low Kt/V due to missing values from previous periods in the CROWNWeb data, which contain information on in 2011; 2012–2017 for high calcium and low Kt/V due to missing values from previous periods in the CROWNWeb data, which contain information on quintile, and the income quintile of the ZIP code of residence for each patient. Additional controls include year-month fixed effects, facility fixed effects, and measures of the patient's health status relative to each measure ever used in the QP during the patient's first six months in the data. Finally, where indicated, controls also include the patient's contemporary health take the form of indicator variables for each specific measure, which take value 1 if the patient has readings that do not satisfy the QP rules in the current period. Standard errors clustered by patient are in parenthese the columns labelled "Low HGB," 1{Penalty-Inducing} is equal to 1 in year 2010 if a given patient has at least one low hemoglobin reading in the period October–December 2009, and 0 otherwise. 1{Post} is an indicator variable that takes value 1 if the QIP measure is active in a given period. An observation is a patient-month. Sample consists of observations for in-center hemodialysis patients between the ages of 18 and 100 with Medicare as their primary payer from varying time periods: 2008–2010 for low HGB and high HGB to avoid the confounding effect of the switch from fee-for-service to prospective payments treatment time and calcium levels; and 2011–2017 for transfusion to avoid the confounding effect of the switch from fee-for-service to prospective payments in 2011. The first six months of observations for each patients are removed from the sample. Patient controls include indicator variables for incident comorbidities and characteristics reported on medical evidence forms, including diabetes, hypertension, BMI bin, GFR bin, HGB bin, income bin, high

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Online Appendix

A Computing TPS Scores and QIP Timeline

Figure A1: Computing TPS Scores

Notes: The figure shows how the TPS score is computed from the QIP measures and claims data for a hypothetical facility. The Total Performance Score is based on a weighted average of the measure scores.

Notes: The figure presents the relevant events for each payment year from PY2012 to PY2017. The checkered yellow and orange period is both the self-comparison period and national comparison period.

B Summary Statistics for All Variables

	Observations	Mean	Std. Dev
Diabetic $(\%)$	26,625,637	53.4	49.9
Hypertensive $(\%)$	26,625,637	88.0	$32.5\,$
BMI $(kg/m2)$	26,300,140	$30.0\,$	$8.3\,$
$\rm GFR$	26,601,216	$8.6\,$	$5.1\,$
Dialysis Tenure (months)	26,625,907	53.2	46.2
HGB (g/dL)	26,625,907	9.7	$1.9\,$
High Albumin $(\%)$	26,625,907	63.2	48.2
Cancer $(\%)$	26,130,264	4.9	$2.2\,$
Drug use $(\%)$	26,129,682	$1.3\,$	$1.1\,$
Drinker $(\%)$	26,129,525	$1.4\,$	$1.2\,$
Smoker $(\%)$	26,130,796	$6.3\,$	$2.4\,$
Needs Assistance $(\%)$	26,134,413	$\rm 9.3$	$2.9\,$
COPD $(\%)$	26, 131, 127	$6.5\,$	$2.5\,$
Atherosclerotic Heart Disease $(\%)$	25,669,050	14.1	34.8
Peripheral Vascular Disease (%)	26,132,394	$10.7\,$	$30.8\,$
Ischemic Heart Disease $(\%)$	26,130,706	8.1	$27.3\,$
Congestive Heart Failure $(\%)$	26,136,434	$27.5\,$	44.6
Male $(\%)$	26,625,090	$54.5\,$	$49.8\,$
Non-Hispanic White $(\%)$	26,566,969	$39.3\,$	48.8
Black $(\%)$	26,625,907	$38.3\,$	$48.6\,$
Hispanic $(\%)$	26,566,969	16.6	$37.2\,$
Asian $(\%)$	26,625,907	$3.6\,$	18.6
Other Race $(\%)$	26,625,907	3.7	19.0

Table A1: Summary Statistics — Patient Characteristics

Notes: The table presents summary statistics for the incident clinical characteristics and patient demographics included in the regressions above. An observation is a patient-month. All variables are at incidence aside from dialysis tenure, which measures the number of months since the patient started dialysis . BMI, GFR, and HGB are included in the regressions in the form of indicator variables for each bin but reported here as continuous variables.

	Observations	Mean	Std. Dev
Median ZIP Income	58,658	49,445.3	19,555.2
Facility Age (years)	58,197	14.2	10.1
Chain $(\%)$	58,197	80.4	39.7
Freestanding $(\%)$	58,197	92.5	26.3
Facilities in ZIP	58,497	1.7	1.1
Mortality Rate	57,297	8.6	5.6
Hospitalization Rate	57,297	53.9	13.2
Infection Rate	57,297	12.2	6.9

Table A2: Summary Statistics — Facility Characteristics

Notes: The table presents summary statistics for facility characteristics and quality indicators. An observation is a facility-year. Median income by ZIP Code is included in the regressions in the form of indicator variables for each bin but reported here as a continuous variable. Mortality, hospitalization, and infection rates are measured as the percentage of patients who had at least one event during the year while at the facility. The denominator includes all patients who received dialysis at a facility for at least one month, so it includes switching patients (incoming or outcoming) as well.

	Observations	Mean	Std. Dev
Penalty-Inducing $(\%)$	25,415,757	33.1	47.0
Penalty Score	24,813,002	0.09	0.15
Low HGB $(\%)$	26,028,936	13.5	34.2
Low HGB $(\%)$	26,028,936	$13.5\,$	34.2
High HGB $(\%)$	26,028,936	11.0	$31.3\,$
Low URR $(\%)$	25,815,787	$4.9\,$	$21.6\,$
Bad Vasc. Access $(\%)$	20,268,446	37.1	48.3
Low Kt/V $(\%)$	15,860,912	2.9	16.8
Infection $(\%)$	26,625,907	1.9	13.6
Transfusion $(\%)$	26,625,907	0.7	8.2
Readmission $(\%)$	26,625,907	0.4	$6.1\,$
High Calcium $(\%)$	14,249,025	2.6	16.0
Base Low HGB (%)	25,878,185	$15.2\,$	$21.3\,$
Base High HGB $(\%)$	25,878,185	$30.5\,$	28.6
Base Low URR (%)	26,197,810	12.7	23.2
Base Bad Vasc. Access $(\%)$	24,664,649	47.0	46.5
Base Low Kt/V $(\%)$	22,607,867	$4.3\,$	12.9
Base Infection $(\%)$	26, 238, 423	$1.7\,$	5.9
Base Transfusion $(\%)$	26,238,423	$\rm 0.2$	$2.1\,$
Base Readmission $(\%)$	26,238,423	$0.3\,$	2.3
Base High Calcium $(\%)$	21,717,856	$3.8\,$	12.0

Table A3: Summary Statistics — QIP Measures

Notes: The table presents summary statistics for contemporary and baseline QIP measures. An observation is a patient-month. Low HGB indicates HGB below 10 g/dL. High HGB indicates HGB above 12 g/dL. Low URR indicates URR below 65%. Bad vascular access indicates receiving dialysis through a catheter or graft. Low Kt/V indicates Kt/V below 1.2. Readmission, infection, and transfusion indicate whether the patient was readmitted to the hospital within 90 days of a discharge, hospitalized for septicemia, or transfused in the month. Baseline versions of each measure are the patient-specific average of the measure over their first six months in the data.

	O bservations	Mean	Std. Dev
EPOGEN (1000 IUs)	26,625,907	40.6	56.9
IV Iron (IUs)	26,625,907	202.7	245.4
Cinacalcet $(\%)$	18,469,107	18.2	38.6
Treatment Time (minutes)	12,256,129	219.7	27.9

Table A4: Summary Statistics — Measures of Facility Effort

Notes: The table presents summary statistics for proxies of effort assessed in Table [4.](#page-25-0) An observation is a patient-month. Cinacalcet is an indicator variable for receiving any cinacalcet in the month. Treatment time is the reported time dialyzed in a patient's last dialysis session of the month.