

CMS Response to Public Comments Received for CMS-2744

The Centers for Medicare and Medicaid Services (CMS) received comments from dialysis providers and private citizens. This is the reconciliation of the comments.

Comment:

CMS received comments from a large dialysis provider who expresses desire to understand the rationale for including staffing ratios in the proposed CMS-2744 form. The commenter highlights that manual calculation of staffing ratios would provide limited view and create additional burden. They provide a recommendation to remove the field or provide some way to populate the field automatically.

Response:

CMS appreciates the insight from the dialysis provider and are happy to share the rationale for including staffing ratios in the new iteration of the CMS-2744 form. CMS believes that analyzing the average staffing ratios in the facility will assist the Network program in identifying appropriate quality improvement methods that would be responsive to the typical level of staffing available in a facility. Additionally, information regarding the staff available for patient education and other quality improvement efforts would be valuable for tailoring interventions to each facility by the Networks.

To address your second concern, regarding the burden to staff. CMS can work with the provider community to expand the staffing module in EQRS to capture this data on an agreeable cadence to automatically populate the field before submission.

Comment:

CMS received comments from an independent citizen who was glad to see the proposed ESRD Facility Survey.

Response:

CMS appreciates the comment and the time taken to post a question during the comment period.

Comment:

CMS received a general comment from an anonymous member using the “WhoPooApp” criticizing the use of Medicaid by illegal immigrants for newborn deliveries.

Response:

This comment was out of the scope of the information collection.