



June 30, 2025

William N. Parham, III
Director, Division of Information Collections and Regulatory Impacts
Office of Strategic Operations and Regulatory Affairs
Division of Regulations Development
Centers for Medicare & Medicaid Services
Department of Health and Human Services

Re: Agency Information Collection Activities: Submission for OMB Review; Comment Request

Fresenius Medical Care (FME) appreciates the opportunity to comment on proposed revisions to the CMS-2744, an annual survey form that captures certification and other information about End Stage Renal Disease (ESRD) facilities. FME is the largest integrated supplier in the country of services and products for individuals undergoing dialysis. We provide dialysis services to over 206,000 people with kidney failure in the United States.

We appreciate CMS's ongoing efforts to improve data collection through the revised CMS-2744 Annual Dialysis Survey Form. With regard to the new "Staffing Ratio" field, we request that CMS elaborate on its policy rationale for collecting a staffing ratio. We note the staffing ratio contemplated by the form would only represent a snapshot in time and would not reflect the dynamic nature of staffing throughout the year, which fluctuates based on factors such as shift patterns, patient census, patient acuity, and state nursing regulations.

Given these challenges, we request that the staffing ratio field be removed from the form. If CMS decides to retain this field, we recommend staffing ratios be calculated in order to minimize the burden on dialysis clinic staff. We note that requiring manual calculation adds an extra burden on clinic staff and introduces the potential for inconsistency in ratios calculated across clinics.

With regard to the proposed change to add "Days" and "Shifts" the dialysis facility is open, we note existing facility demographic fields on the CMS-2744A are currently not visualized on the electronic version of the form submitted in EQRS. We seek clarification as to whether CMS is proposing to only update the paper/PDF version of the form or if CMS's intention is to redesign the electronic version of the form in EQRS. If CMS is planning to redesign the electronic form, FME encourages CMS to pull the facility demographic data from the Facility Module and automatically populate the information to avoid adding burden to the users that manual data entry would create.

Recommendation: We recommend CMS remove staffing ratio from the revised form. If CMS does retain the staffing ratio field, we request CMS calculate the ratio and populate the field automatically. Finally, FME encourages CMS to pull facility demographic data directly from the Facility Module and automatically populate the information to avoid adding burden to the users that manual data entry would create, if CMS intends to redesign the EQRS form version to visualize the facility demographic data

We appreciate the opportunity to comment. Please feel free to reach out to me if you have any questions.

Fresenius Medical Care

920 Winter Street | Waltham, MA 02451

Sincerely,

A handwritten signature in black ink, appearing to read "Cameron Lynch". The signature is written in a cursive style with a large initial "C" and a long, sweeping tail.

C.M. Cameron Lynch, SVP Government Affairs