



October 20, 2026
The Honorable Mehmet Oz
Administrator
Centers for Medicare & Medicaid Services
200 Independence Avenue, SW
Washington, D.C. 20001

RE: End Stage Renal Disease Medical Evidence Report Medicare Entitlement and/or Patient Registration (CMS-2728)

Dear Administrator Oz,

On behalf of the more than 37,000,000 Americans living with kidney diseases and the 22,000 nephrologists, scientists, and other kidney health care professionals who comprise the American Society of Nephrology (ASN), thank you for the opportunity to comment on the Centers for Medicare & Medicaid Services' (CMS) proposed revisions to Form CMS-2728, End Stage Renal Disease Medical Evidence Report.

ASN has concerns regarding CMS' proposal to remove questions 19, 21, 23, 24 and 25, which address patient housing security, caregiver support, transportation, health literacy, and financial strain from CMS Form 2728. ASN recognizes that Form-2728 may not be the most appropriate mechanism for collecting this information, particularly given the evolving nature of patients' social and economic circumstances. However, ASN urges CMS to ensure the continued collection of these data through an appropriate mechanism that supports both individual patient care and national efforts to understand the social risk factors affecting people with kidney failure. ASN also urges CMS to restore the race and ethnicity fields that were removed from CMS Form-2728 in 2025. ASN additionally requests an extension of the public comment period to allow the kidney community more time to evaluate the proposal and develop consensus.

Kidney failure affects more than 800,000 Americans and imposes a substantial clinical and financial burden on patients, families, and the health care system. Despite representing less than one percent of the Medicare population, the Medicare program spends approximately \$50 billion annually caring for patients with kidney failure. Research demonstrates that unmet social and economic needs can complicate access to timely kidney care, contribute to poorer patient outcomes, and increase health care utilization. Understanding these factors is essential to identifying opportunities to improve kidney health outcomes and reduce preventable health care expenditures.

These objectives align with the Trump Administration's Make America Healthy Again (MAHA) priorities of addressing chronic disease and reducing health care costs.

Form CMS-2728 serves as an important source of national data for the United States Renal Data System (USRDS), a national surveillance resource that the National Institutes of Health (NIH) and CMS support. Researchers and policymakers rely on USRDS data to examine kidney failure incidence, treatment patterns, comorbid conditions, and patient outcomes. Collecting information about patients' other nonclinical circumstances alongside their clinical characteristics for people with kidney failure creates opportunities to examine how these factors relate to disease progression, access to kidney care, and patient outcomes. Without an alternative mechanism for national data collection, removing these questions from Form-2728 would create a substantial gap in the information available to researchers and policymakers, limiting efforts to identify disparities, develop targeted interventions, and improve kidney health outcomes.

ASN recognizes the administrative burden concerns that some dialysis facilities raised following the introduction of these questions in 2023 and supports exploring ways to minimize these burdens. However, removing these questions without establishing an alternative means of collecting comparable information would eliminate an important source of national data on the nonclinical factors affecting people with kidney failure. ASN encourages CMS to explore alternative approaches that support ongoing assessment of patients' social risk factors while balancing the need for national data collection with patient privacy, data quality, and administrative burden. ASN stands ready to work with CMS and the broader kidney community to identify best practices and develop an appropriate approach to collecting this information. ASN reiterates its request that CMS restore race and ethnicity data collection to Form CMS-2728 and extend the public comment period to allow for additional stakeholder input on these proposed changes.

To discuss this letter further, please contact Lauren Ahearn, ASN Senior Policy and Government Affairs Coordinator, at lahearn@asn-online.org.

Sincerely,

A handwritten signature in black ink, appearing to read "Sam M. Parikh".

Samir M. Parikh, MD, FASN
President