



American Society of Pediatric Nephrology

6728 Old McLean Village Drive, McLean, VA 22101, ph. 703.556.9222; fax 703.556.8729

February 10, 2023

Lisa Rees

Health Insurance Specialist

Office of Strategic Operations and Regulatory Affairs

Division of Regulations Development

Document Identifier: CMS-2728; OMB control number: 0938-0046

Room C4-26-05,

7500 Security Boulevard, Baltimore,

Maryland 21244-1850.

RE: Agency Information Collection Activities: Proposed Collection; Comment Request
Document Identifier: CMS-2728; OMB control number: 0938-0046; CMS-2728 End Stage
Renal Disease Medical Evidence Report Medicare Entitlement and/or Patient Registration

Dear Ms. Rees:

On behalf of the American Society of Pediatric Nephrology (ASPN), I am writing regarding the proposed revisions to the CMS-2728 ESRD Medical Evidence Form. Founded in 1969, ASPN currently has over 700 members, making it the voice for pediatric kidney disease. Our members strive to ensure that affected infants, children, adolescents, and young adults receive appropriate and high-quality care.

ASPN has been in regular communication with the Centers for Medicare & Medicaid Services (CMS) and submitted formal comments about ways to improve the data collected about children with end-stage renal disease (ESRD). Children with ESRD are the only pediatric patients automatically eligible for Medicare coverage, and their care differs significantly from that delivered to adults. Despite these differences, their care needs and unique health conditions are not differentiated from those of adults by the Medicare reimbursement structure and the agency's data collection mechanism. As such, ASPN has urged CMS to begin collecting information on pediatric-specific comorbidities to reflect the care and resources being delivered to this population more accurately. Therefore, ASPN is pleased that CMS has proposed to update the CMS-2728 form to include pediatric-specific comorbidities and we urge the agency to finalize their addition to Section A #19 of the form.

Thank you for proposing these additions to ensure CMS' data more accurately describes the children with ESRD who are covered by Medicare and the opportunity to submit these comments.

We welcome future opportunities to work with you to address the needs of children with ESRD. Should you have any questions or require further information, please contact Erika Miller, ASPN's Washington representative, at emiller@dc-crd.com.

Sincerely,

A handwritten signature in cursive script, appearing to read "Jodi Smith".

Jodi Smith, MD, MPH
President