



November 25, 2024

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Office of Strategic Operations and Regulatory Affairs  
Division of Regulations Development  
Centers for Medicare and Medicaid Services  
7500 Security Boulevard, Baltimore, MD 21244-1850.

**Re: Agency Information Collection Activities: Proposed Collection; Comment Request:  
Revisions to CMS-2744**

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 regards 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 not only adds an extra burden on clinic staff but also introduces the potential for inconsistency in ratios calculated across clinics.

**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.

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

Sincerely,

A handwritten signature in black ink, appearing to read 'Cameron Lynch', written in a cursive style.

C.M. Cameron Lynch, SVP Government Affairs

Fresenius Medical Care

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