

From: [Patzner, Rachel](#)
To: [HRSA Paperwork](#)
Cc: [Lynch, Raymond \(HRSA\)](#)
Subject: [EXTERNAL] RE: Public Comment for HRSA Data Collection Effort
Date: Thursday, January 9, 2025 11:52:40 AM
Attachments: [image001.png](#)

Hi there,

I realize we are late to sending this last comment as an addendum to our prior comments on the pre-waitlisting data collection effort, but it's an important comment. There is no data element listed in here for the CMS Certification Number (CCN) of the dialysis facility (or health system) for where the patient was referred from. This will be really important to go beyond just getting data on the provider referral (since providers can treat patients in multiple facilities). This would be very relevant to CMS and other kidney failure / ESRD patients and/or other non-kidney patients to identify WHERE the referral came from.

Our experience from the [Early Steps to Transplant Access Registry \(E-STAR\)](#) suggests this data element is critical to let referring health systems know their quality measures as it relates to transplant access.

So in summary, please consider ADDING the data element for the CMS Certification Number for where the referrals came from as a data element in the referral form / at the time of referral.

Let me know if it would be helpful to elaborate on this or update our prior letter we submitted with the rest of the comments on this point.

Thank you,

Rachel

Rachel Patzner, PhD, MPH

President & CEO, Regenstrief Institute

Professor, Department of Surgery

Regenstrief Foundation Leonard Betley Chair, Indiana University School of Medicine



1101 West 10th Street

Indianapolis, IN 46202

Tel 317-274-9324 | Facebook.com/regenstriefinstitute | www.regenstrief.org

From: Patzner, Rachel
Sent: Friday, January 3, 2025 9:20 AM
To: paperwork@hrsa.gov
Subject: Public Comment for HRSA Data Collection Effort

Please find attached our comments on the HRSA Data collection effort related to pre-waitlisting data. Thank you,

Rachel Patzer, PhD, MPH

President & CEO, Regenstrief Institute

Professor, Department of Surgery

Regenstrief Foundation Leonard Betley Chair, Indiana University School of Medicine



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Indianapolis, IN 46202

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