



January 15, 2016

Reference: OMB control number – 0938-0360

Comments on CMS-3427 End Stage Renal Disease Application and Survey & Certification Report

To Whom It May Concern:

Item 15 – Facility Administrator Name - Suggest addition of email address in addition to the telephone number

Item 17 – We have seen a number of errors in this section. For more clarity, we suggest that the word “**not**” in the third line be underlined.

Item 18 – We suggest that the same questions be asked here that are asked in Item 17.

Item 20 – Provide clarification that “current services” are those services that a new facility intends to offer when the facility is approved.

Item 21 – (a) In the absence of guidance that is typically provided in a State Operations Manual, provide clarification in the instructions as to whether the 3427 will need to be submitted - requesting new home dialysis (HD or PD) - *prior to* training a patient or *after* a patient has been trained so the training records can be reviewed. (b) Given the fact that nocturnal hemodialysis is not a new service, but is hemodialysis on a night shift, please clarify in the instructions whether a 3427 must be submitted before adding a nocturnal shift.

Item 22 – Provide clarification on the requirements of reporting long term care (LTC) facility information. Specifically, clarify whether LTC facility information should be reported each time a dialysis facility adds or eliminates a LTC facility in which its patients are dialyzing, or whether the current list of LTC facilities be updated at the time of surveys.

Item 24 – Clarify in the instructions that there is no specific count/number of training rooms. The number is usually related to the size of the facility and the number of patients who are being trained. Adding another treatment area should not require submission of a new 3427 if the facility is already approved for home training (PD or HD or both).

Item 25 – This is confusing since in-center nocturnal HD stations are counted in the total approved in-center dialysis stations for a facility. We suggest removing in-center nocturnal HD from this question. As stated previously, nocturnal HD is an overnight shift, but it is still hemodialysis treatment. A facility can initiate a nocturnal shift just as it initiates an evening shift as the census increases or if some of the patients are working or going to school.