CMS-2728 Tip Sheet:
Frequently Asked Questions

Comagine Health
End Stage Renal Disease

General Questions

Are there instructions for the CMS-2728?
Yes. Detailed CMS-2728 instructions, including due dates and descriptions for all the fields, are located at the end of the CMS-2728.

How do I change a submitted CMS-2728?
Contact Network 16 data staff to request an update.

The patient started new ESRD at my facility but there is no option to create a CMS-2728 in EQRS.
Verify the admit reason is "New ESRD Patient."

Do I complete the form if the patient already has Medicare?
Yes. The ESRD Medical Evidence Report serves to register the patient as new ESRD and acts as a Medicare entitlement form. The patient may also be entitled to more benefits if applying for ESRD Medicare coverage.

The patient is acute/AKI. Do I submit the CMS-2728?
No. Do not submit the CMS-2728 for patients who are acute, and do not admit them in EQRS. Contact Network 16 data staff if you have admitted an acute patient.

Are both the Social Security Number (SSN) and the Medicare Beneficiary Identifier (MBI) required?
Yes. These fields are required if the patient has an SSN or MBI.

Why can't I update a field on the CMS-2728?
Some fields on forms are populated from other sections of EQRS, such as the patient or treatment modules.

Medicare Coverage

The patient already has Medicare. Do I select "No" for the question "Is patient applying for ESRD Medicare coverage?" (field 9)?
ESRD Medicare Coverage is a special program with different rules for when the coverage begins and when it ends. If a patient has Medicare Coverage, it does not mean they have ESRD Medicare Coverage, and they may wish to apply for it.

Clinical and Lab Data

The nephrologist selected "Graft" for "What access was used on first outpatient dialysis" (field 16d). Do I need to answer, "If not AVF, then: Is maturing AVF present?"?
Yes. A graft may be placed instead of a catheter if the patient is waiting for a fistula to mature or if the fistula is failing to mature.

For the question "What access was used on first outpatient dialysis" (field 16d), why won't EQRS let me select "PD catheter" for my peritoneal dialysis (PD) patient?
This field is only required for patients who started on hemodialysis or other treatment types. It is not required for peritoneal patients.

What if I do not have all the labs (fields 17a-h)?
Although the Network would like you to report as many labs as possible, "Serum Creatinine" (field 17d) is the only required lab to submit the CMS-2728.

What is the difference between "Prior lab values" and "Admission lab values" (field 17)?

- **Prior lab values:** Laboratory values obtained within 45 days prior to "Date regular chronic dialysis began" (field 30).
- **Admission lab values:** Laboratory values drawn within 15 days prior to or 15 days after the "Date patient started chronic dialysis at current facility" (field 31).

Dialysis Dates

What date do I use as the "Date regular chronic dialysis began" (field 30)?
For new ESRD admissions, enter the date of the patient's first chronic dialysis ever (as determined by the nephrologist) in field 30. It could be the first time the patient dialyzed at your facility or an inpatient hospital date.

Transplant

I do not have the transplant preparation hospital information (fields 41-42). How do I fill this out?
If you cannot obtain transplant preparation hospital information, leave it blank.

In EQRS, the CMS-2728 form says the kidney transplant is functioning and I cannot change this. How do I update this?
Contact Network 16 data staff with the EQRS ID (UPI) and request to have the status changed to "non-functioning."

The patient is returning to dialysis after a transplant failed. What date do I use for "If non-functioning, date of return to regular dialysis" (field 45).
Use the same date you used for the "Date regular chronic dialysis began" (field 30).

Home Training

The patient began training inpatient prior to coming to our facility. Can I put the inpatient date for the date training began?
Yes, if the inpatient training was not more than 30 days prior to the start of a regular course of dialysis.

Physician and Patient Signatures

Are blue ink signatures required?
No. Social Security has confirmed that a blue ink signature is no longer required for the CMS-2728.

I have included training on the form. Where does the nephrologist sign?
The nephrologist/physician familiar with the patient's training signs in field 53b. The attesting physician signs in field 58. If it is the same physician, the physician signs in both fields.

Can a physician assistant (PA) or nurse practitioner (NP) sign the CMS-2728 form?
No. The CMS-2728 must be signed by the treating physician (MD or DO) who is knowledgeable about the patient's kidney failure.

What is "Physician recertification signature" (field 60)?
This is for SSA purposes only. It can be used to re-submit the original CMS-2728 for patients who initially did not apply for Medicare as a new ESRD patient but are choosing to apply at a later date. Contact your Social Security office for further instructions.

The patient died before signing the CMS-2728 form. What do I do?
Add the death information to the CMS-2728 form in EQRS. For "Patient unable to sign/mark reason," select the option "Patient expired" and enter the "Expired date." Leave the "Patient signature and date" (fields 63-64) blank.

The patient stopped dialysis but has not died. Can I submit the form without a signature for "Signature of patient" (field 63)?
No. You must get a signature from the patient, a family member or spouse of the patient, or a POA. The Network cannot accept forms without a signature in field 63 for these cases.

What if the patient refuses to sign the CMS-2728 form?
Contact Network 16 data staff to discuss.

If the patient is lost to follow-up (LTFU) or moved out of the U.S. can I select this option for "Patient unable to sign/mark reason" and submit the CMS-2728 form without a patient signature?
Contact Network 16 data staff to discuss before using this option.

Re-Entitlement CMS-2728

When do I do a re-entitlement CMS-2728?

- **Dialysis after a failed transplant:** Complete for a patient returning after a transplant failed if the kidney transplant was > 3 years ago. Do NOT do a re-entitlement CMS-2728 for a patient admitted as "Dialysis in support of transplant."
- **Restarting dialysis:** Complete for a patient who stopped dialysis > 1 year ago and is restarting dialysis.

Supplemental CMS-2728

To determine if a supplemental form is needed for a home training patient, do I count by 90 days or three months?
Count by three months. Example: A patient that started in-center hemodialysis on Jan. 15 and started CAPD training on March 20 needs a supplemental form for their training. This patient does not need a form if they start training on or after April 1.

Do I complete a supplemental form if the patient changed from CAPD to CCPD?
No. You only complete the form the first time they change to a home modality within 3 months of their initial start.

What do I do if the patient did not complete their training and I submitted the form saying they did?
Contact Network 16 data staff and SSA immediately.