CMS-2728 Frequently Asked Questions

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General Questions
1. When is the 2728 form due?
   a. Within 45 days of the date the patient started chronic dialysis at your facility.
2. How do I change a submitted 2728 form?
   a. Submit a ticket with the QualityNet Help Desk: 1-866-288-8912. Changes will be approved if request
      is made within 5 business days of 2728 form submission or if the change impacts a patient’s
      Medicare coverage (field 23).
3. How long do we need to keep a copy of the 2728 form?
   a. This is up to your individual facility policy.
4. The patient started New ESRD at my facility, but EQRS doesn’t give me the option to create the 2728 form.
   a. Check the admit reason to make sure admit reason is New ESRD Patient.
5. If the patient already has Medicare, do I need to submit a form?
   a. Yes. The ESRD Medical Evidence Report serves as both a Medicare entitlement form and as a
      registry for new ESRD patients. In addition, it is possible the patient is entitled to more benefits if
      applying for ESRD Medicare coverage.
6. The patient is acute. Do I submit a 2728?
   a. No. Do not submit a 2728 for patients who are acute. Only submit for chronic ESRD patients.
7. The patient had a prior kidney transplant. Do I fill out an initial 2728 form?
   a. If it has been greater than 3 years since the transplant, you will fill out a Re- Entitlement 2728 form.
8. My list of missing forms on the EQRS dashboard does not look accurate. What do I do?
   a. Open a ticket with the QualityNet Help Desk: 1-866-288-8912 so this can be investigated.

Patient Demographics
1. What do I put for country or area of origin?
a. Whatever country the patient most associates themself with. It is filled in only if patient is Hispanic or Latino (Field 7) or Native Hawaiian or Other Pacific Islander (Field 9).

2. The patient is Hispanic or Latino. Do I need to fill in a race in field 9?
   a. Yes. Race is a mandatory field. Fill in the race the patient most associates themself with.

3. What are the requirements for reporting race and ethnicity on the 2728?
   a. Both race and ethnicity must be "self-reported" by patient or patient's family when completing the 2728. “Self-reported” is defined as the patient/patient’s family member or POA verbal or written confirmation of ethnicity and race.

   If a patient or patient’s family member is unable to self-report the ethnicity and/or race, providers may record this information on behalf of the patient, but must acknowledge the absence of the patient’s self-reported ethnicity and race in the remarks area (field 52) by noting that “fields 7-9” were reported by: _____

1. The patient is multi-racial. What do I check on the form?
   a. You can check more than one race on the 2728 form. Please mark all that apply.

2. The patient fits multiple prior and current employment statuses. Can I check more than one?
   a. You can only choose one status per category (Prior & Current). Both prior and current are required.

3. The form only lets me update prior employment status, not current. How do I update current status?
   a. Edit and update on the patient page.

Medicare Coverage
1. The patient already has Medicare. Do I always mark field 10 - Is Patient Applying for ESRD Medical Coverage? as “No” for these patients?
   a. No. ESRD Medical Coverage is a special program with different rules for when the coverage begins and when it ends. If a patient has Medical Coverage from Medicare, this does not mean they have ESRD Medical Coverage and may wish to apply for it.

Clinical and Lab Data
1. In field 17d, the nephrologist marked that a graft was the access used on the first outpatient dialysis. Do I need to mark the follow up questions?
   a. Answer the 1st follow-up question – “Is maturing AVF present.” The patient may have a fistula that is failing to mature, and a graft may be placed instead of a catheter in this case. A graft may also be placed as they wait for a fistula to mature.

2. I don’t have an HbA1c or Lipid Profiles for the patient (Field 18d-e). Can I submit the form?
   a. Yes. Although the Network would like you to report as many labs as possible, Serum Creatinine is the only required lab for the 2728 form.

3. I have labs that are within 45 days, but they are after the nephrologist signed. Can I use them?
   a. All labs must be done on or prior to the date the nephrologist signed the 2728 form. They cannot be after.

4. Can I use labs after the date in field 23?
   a. Labs should be prior to the date in field 23. If drawn on the date in field 23, they must be pre-dialysis labs. For 2728s generated in EQRS, labs after the date in field 23 are not allowed.

Dialysis Dates
1. What date do I use as the date regular chronic dialysis began?
a. Use the patient’s first chronic dialysis ever as determined by the nephrologist for field 23. This could be the first time the patient dialyzed at your facility, or it could be an inpatient date.

Transplant
1. The patient has been informed of kidney transplant options (field 25) but was informed they were NOT a candidate. Do I mark the reason in field 26?
   a. No. Leave field 26 blank and select “Yes” for field 25 if patient was informed of kidney transplant as an alternate option to in-center hemodialysis regardless of whether the patient is considered a candidate for transplant.
2. I do not have the transplant preparation hospital information. How do I fill this out?
   a. If you can’t obtain transplant preparation hospital information, leave it blank. It is not a required field. If you have the information, contact the Network.
3. EQRS 2728 form says the kidney transplant is functioning and I cannot change this. How do I update this?
   a. Contact the ESRD Network with the UPI and request to have the status changed to “non-functioning”.
4. The patient is returning to dialysis after a transplant failed. What date do I use for field 35?
   a. You will use the same date you use in field 23 – the first chronic dialysis after the transplant failed.
5. EQRS 2728 form has the wrong date for field 35 (if non-functioning, date of return to regular dialysis). How do I update this?

Home Training
1. Patient began training inpatient prior to coming to our facility. Can I put the inpatient date for the date training began?
   a. Enter the date self-dialysis training began. (While it is expected that this date will be after the date patient started a regular course of dialysis, it should not be more than 30 days prior to the start of a regular course of dialysis.)
2. I have included training on the form. Where does the nephrologist sign?
   a. The physician familiar with the patient’s training signs and dates field 43. The attesting physician signs in fields 48/49. If they are different, both would sign the 2728.

Physician and Patient Signatures
1. I have included training on the form. Where does the nephrologist sign?
   a. If the nephrologist is the attesting physician and the physician familiar with the patient’s training, they sign and date in field 43 and in fields 48/49. If the attesting physician is different from the physician familiar with the patient’s training, you will need signatures from both nephrologists in the appropriate sections.
2. Can a Physician Assistant (PA) sign the 2728 form?
   a. No. The CMS 2728 must be signed by the treating physician (MD or DO) who is knowledgeable of his/her kidney failure. An APRN or PA cannot sign this form in lieu of a physician based on Social Security's definition of "physician." The instructions for the CMS 2728 do not allow the use of signature stamps.
3. What is field 50 – Physician Recertification signature?
This is for SSA purposes only. It can be used to re-submit the original 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 social security for further instructions.

4. The patient died before signing the 2728 form. What do I do?
   a. Add the death information to EQRS. Submit the 2728 form with the date of death written in the remarks section (field 52) along with a comment indicating the patient expired before they were able to sign the 2728. Leave the patient signature and date fields (Fields 53/54) blank.

5. The patient stopped dialysis but has not died. Can I submit the form without a signature for field 53?
   a. 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 53 for these cases.

Re-Entitlement 2728

1. A patient is dialyzing at my facility, but the transplant has not failed. Do I do a re-entitlement 2728?
   a. No. Do not complete a Re-entitlement 2728 form for a patient returning after a transplant > 3 years unless you have verified the transplant has failed (transplant will not function again).

Supplemental 2728

1. Who do I submit a supplemental form for?
   a. Patients who started as In-Center Hemodialysis but started PD or Home Hemodialysis training within 3 months of their start date in field 23 or had a kidney transplant within 3 months of their start date.

2. Do you do a supplemental form for patients who started within 90 days, or do you count by 3 months?
   a. Count by 3 months. Ex. – A patient that started In-Center Hemodialysis on Jan 15th and started CAPD training March 20th needs a supplemental form for their training. This patient does not need a form if they start training on or after April 1st.

3. I did a supplemental form when the patient changed to CAPD within 3 months of their In-Center Hemodialysis start date. The patient has now switched to CCPD. Do I need to do another supplemental form?
   a. No. You do not need to do a new form each time the patient trains on a new modality, only the first time they change to a home modality within 3 months of their initial start. Modality change information is reported in EQRS by adding a treatment in EQRS.

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

5. I am a transplant center. It has been less than 3 months since the patient began their initial dialysis, but they were doing PD or Home Hemodialysis prior to the transplant. Do I need to do a supplemental 2728?
   a. If the patient completed PD training or Home Hemodialysis training prior to the transplant and the dialysis facility completed a supplemental 2728, the transplant center does not need to do a supplemental 2728 form in this case, even if it is < 3 months.