



ANNA
American Nephrology
Nurses Association

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Mehmet C. Oz, MD, MBA
Administrator
Centers for Medicare & Medicaid Services
Department of Health and Human Services
200 Independence Avenue SW
Washington, DC 20201

Subject: Request to Reinstate Race and Ethnicity Fields on Form CMS-2728

Dear Administrator Oz:

The American Nephrology Nurses Association (ANNA) Research Committee writes to express our deep concern regarding the recent removal of the race and ethnicity fields from Form CMS-2728, the Medicare enrollment form used for all individuals initiating treatment for end-stage kidney disease (ESKD).

As documented by national kidney organizations, including the American Society of Nephrology (ASN), the American Nephrology Nurses Association (ANNA), and the National Kidney Foundation (NKF), the removal of these demographic fields eliminates essential data that have long guided research, clinical practice, quality improvement, and policy development in kidney care. These fields are vital for understanding social determinants of health and identifying disparities in ESKD prevalence, treatment patterns, and transplant access.

Form CMS-2728 has historically provided the demographic data used by the U.S. Renal Data System (USRDS), maintained by the National Institutes of Health. Without accurate information on race and ethnicity, researchers and policymakers lose the ability to detect inequities such as the disproportionately high rates of kidney failure among Black, Hispanic, and Native populations and to develop interventions addressing these disparities.

Nephrology nurses rely on these data to assess care delivery, improve patient education regarding home dialysis, examine access to transplant pathways, and study differences in clinical outcomes. The removal of these fields jeopardizes these critical efforts and undermines national progress toward equitable kidney care.

For these reasons, the ANNA Research Committee respectfully urges CMS to:

Request to Reinstate Race and Ethnicity Fields

- Reinstate the race and ethnicity questions on Form CMS-2728 immediately, to preserve the integrity of kidney care research and national surveillance systems.
- Provide public clarification regarding the rationale for removing these fields and how the decision aligns with CMS's stated commitment to advancing health equity.
- Engage key stakeholders, including nephrology nurses, researchers, nephrologists, social workers, dialysis organizations, and patient-advocacy groups, in future revision processes for Form CMS-2728.

Nephrology nurses are at the forefront of dialysis care, transplant coordination, patient education, and quality improvement. The ability to provide equitable, evidence-based care depends on the availability of comprehensive, accurate demographic data. The removal of these fields represents a significant setback to the entire kidney care community.

We urge CMS to act swiftly to correct this change and to reaffirm its commitment to transparent, data-driven, and equitable healthcare policy.

Thank you for your consideration. We welcome the opportunity to collaborate with CMS to ensure that data collection practices support the needs of all individuals living with kidney disease.

Sincerely,

Shushanne Wynter-Minott

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