

ANNA Submits Formal Comments on CMS's CY 2027 ESRD PPS Proposed Rule, Invites Nephrology Nurse Input at National Summit

Pitman, NJ – September 4, 2026 – The American Nephrology Nurses Association (ANNA) has submitted its formal comments to the Centers for Medicare & Medicaid Services (CMS) on the CY 2027 End-Stage Renal Disease Prospective Payment System (ESRD PPS) Proposed Rule and Requests for Information (RFIs). ANNA's response reflects the association's commitment to safeguarding patient care standards and ensuring that federal policy accurately represents the clinical realities nephrology nurses face every day.

In addition to its standalone advocacy, ANNA worked closely with the broader kidney community through Kidney Care Partners, (KCP) and the Alliance for Home Dialysis to align response letters. By collaborating with these vital coalitions, ANNA has amplified the voice of nephrology nurses to ensure the right of every individual with kidney disease to have a registered nurse in care provision delivered both in traditional clinical facilities and directly in patients' homes. All the letters can be found on ANNA's website at <https://www.annanurse.org>.

ANNA is closely monitoring RFI's included in the proposed rule. The RFI's provide an important opportunity for the nephrology community to help inform future federal policy and highlight areas where existing regulations may need to evolve alongside changes in dialysis practice and patient care. Of particular significance is the potential for CMS to consider whether revisions to the ESRD Conditions for Coverage are warranted. The Conditions for Coverage establish foundational requirements for dialysis facilities and directly influence staffing, clinical responsibilities, patient safety, quality oversight and delivery of care. As part of its advocacy on this issue, ANNA worked with Kidney Care Partners (KCP) and the Alliance for Home Dialysis to secure broader nephrology community support for preserving the critical role of nephrology nurses in home dialysis care. Both organizations included language supporting this position in their comments to CMS.

In its letter, ANNA emphasizes several priorities essential to maintaining safe and effective dialysis care: strengthening the nephrology nursing workforce, preserving RN-led home dialysis training, improving pediatric ESRD payment accuracy, supporting innovation in renal drug therapy, and refining quality measures to better reflect meaningful clinical outcomes. The association affirms that dialysis care continues to grow more complex, and a stable, highly trained nursing workforce is central to patient safety and access.

As the professional voice for nephrology nurses nationwide, ANNA recognizes the importance of responding to federal policy proposals that directly shape clinical practice, staffing requirements, and patient access to home therapies. With the Nephrology Nursing Summit, taking place September 17-20, 2026 in Scottsdale, Arizona, approaching, ANNA will gather additional perspectives from nurses across the country to strengthen its advocacy and ensure CMS hears directly from those delivering dialysis care at the bedside, in homes, and across diverse communities.

The conversation doesn't stop here. At our upcoming Nephrology Nursing Summit, we will gather directly with nurses from across the country to review ANNA's full comments, dive into policy discussions, and sharpen our ongoing advocacy efforts.

ANNA remains committed to working collaboratively with CMS, Congress, and kidney care stakeholders to support a resilient nursing workforce and advance high-quality dialysis care for all patients.

-Michelle Gilliland MSN, RN, BSBA, CNN, FANNA
ANNA National President 2026-2027