



CMS 2728 Form Overview and FAQs

To comply with current CMS policy, all Initial CMS 2728 Forms must be submitted in EQRS no later than 45 days following a patient's first treatment.

What is a CMS 2728 (Chronic Medical Evidence) Form?

- The 2728 form is required by CMS for all ESRD patients pertaining to Medicare entitlement & eligibility and/or for patient registration purposes (*even if a patient is not applying for Medicare benefits*).

Why is a CMS 2728 Form needed?

- Transplant units may require the 2728 form in order for a patient to be placed on the kidney transplant waitlist.
- Timely 2728 form submission directly impacts a dialysis facility's QIP (*Quality Incentive Program*) score and potential reimbursement amount.

Initial 2728 Forms

- Required for all new ESRD patients within 45 days of their first treatment.
- The 2728 form should NOT be completed for AKI (Acute Kidney Inquiry) patients.

Supplemental 2728 Forms

- Required when an initial 2728 has previously been submitted, and:
 - A patient transitions to home dialysis within the first 3 months of initial dialysis, or;
 - A patient has a transplant within the first 3 months of dialysis.

Re-entitlement 2728 Forms

- Required when a patient resumes dialysis treatment after Medicare benefits have been terminated, and:
 - A patient restarts dialysis after 1 year or more after having recovered function or discontinued dialysis, or;
 - A patient restarts dialysis after 3 years or more following a transplant, or;
 - A patient has another transplant, 3 years or more following a previous transplant, with no dialysis in between.



CMS 2728 Form FAQs:

- **Who do I contact if I need to make a change to a submitted 2728 form in EQRS?**
 - If the modification request is made within 5 days of submission, you will contact the **QualityNet Service Center Helpdesk at 1-866-288-8912** to request a modification.
 - If the modification request is made after 5 days of submission, only Field 23 on the 2728 form can be changed, due to the impact on a patient's coverage. All other form changes will not be approved, per CMS policy.
- **What if I need to change the patient's Medicare selection (Field 10) on a submitted 2728 form after the 5-day rule?**
 - If a patient/beneficiary has changed their selection regarding applying for Medicare; the printed 2728 form, Field 10 should be changed and re-certified via physician signature and remarks (Field 50, 51, and 52). Next you will re-send the 2728 form to your local SSA office for processing. No change will occur to the form in EQRS.
 - Please note, even though a patient may already be entitled to general Medicare coverage, the patient can reapply for ESRD Medicare coverage too.
- **What if the patient refuses or is unable to sign the 2728 form?**
 - If a patient is truly unable to sign the 2728 form, it should be signed by a relative, a person assuming responsibility for the patient (POA), or by a survivor.
 - Enter a comment in Remarks (Field 52) as to the why the patient cannot sign.
 - If a patient refuses to sign, please have a conversation with the patient as to why the 2728 form is critically important, the impact it can have on current or future benefits coverage, and transplant waitlist requirements.
- **What if the patient passes away before they can sign the 2728 form?**
 - Enter the patient's date and cause of death in EQRS, this will override the need for a patient signature on the 2728 form.
- **Am I required to complete a 2728 form for patients coming from outside the U.S.?**
 - The patient should be admitted in EQRS. All patients who come from outside the U.S. need a 2728 form. Please enter a comment in Remarks (Field 52) indicating when and where the patient initiated dialysis outside the U.S.
- **How do I print a 2728 form that was submitted in EQRS prior to 2016?**
 - Forms from 2016 or earlier cannot be printed from EQRS. You may print the form using Chrome's print function or contact the patient's initial facility for a copy.
- **Who can select a patient's Primary Cause of Renal Failure (ICD-10 code)?**
 - Primary Cause of Renal Failure should be selected by the patient's attending physician from the current ICD-10 code list.
- **What is the patient's Date Regular Chronic Dialysis Began (DRCDB) if they started dialysis as AKI?**



- Date Regular Chronic Dialysis Began (DRCDB) is the patient's first ESRD dialysis treatment ever, regardless of location or setting.
- **What if I do not have a Serum Creatinine lab within 45 days prior to the patient's DRCDB?**
 - You may use the labs drawn on the patient's first ESRD treatment (DRCDB).
- **Which 2728 forms are required to be sent to the local SSA Office?**
 - All 2728 form types (initial, supplemental, and re-entitlement) must be sent to the SSA office for benefits processing.
- **What if a 2728 form is not generating in EQRS for a patient who is brand new to dialysis?**
 - Check to see if the patient's admission reason in EQRS is correct (New ESRD or Dialysis after Failed Transplant).
 - If the admission reason is correct, it will populate the correct 2728 form.
 - If it is incorrect, please call Midwest Kidney Network for assistance.
- **Which facility completes an Initial 2728, if the patient transfers out to another facility?**
 - The patient's first outpatient dialysis facility is still responsible for completing the 2728 form, even if the patient has since transferred out.
- **Why should the physician and patient sign the 2728 form with blue ink?**
 - Signatures in blue ink denote an original copy of the 2728 form. Most SSA offices still require the physician and patient signatures to be in blue ink.

Please contact Midwest Kidney Network with any questions:

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