



National Renal Administrators Association

September 30, 2008

Mr. Kerry Weems
Acting Administrator
Centers for Medicare and Medicaid Services
Hubert H. Humphrey Building
200 Independence Avenue, SW, Room 341G
Washington, DC 20201

Dear Mr. Weems:

I am writing this letter to request a meeting with you as soon as possible to discuss the CROWNWeb program and its impact on our membership.

As you may know, the National Renal Administrators Association (NRAA) represents dialysis providers throughout the United States. The NRAA includes for-profit and not-for-profit providers, free-standing and hospital-based facilities, and dialysis organizations of all sizes. We are requesting this meeting on behalf of the non-chain members of the NRAA.

Everyone agrees that the more policy-makers and members of the community that treat individuals with kidney disease know about our patients and the general dialysis population, the better we can serve them. We fully support the CROWNWeb program and the purpose that it will ultimately serve.

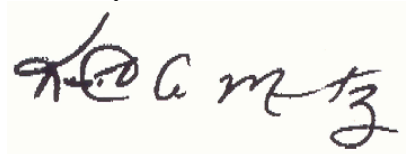
Our concern is the disparate treatment that the small dialysis organizations (SDOs) will confront during the early implementation stages of this important program. Under the current policy, SDOs will not be allowed to batch submit clinical performance measure (CPM) data while the large dialysis organizations (LDOs) will be allowed to do this. Obviously, having to individually enter the data is much more costly and is being required of those facilities that can least afford it. Many of the SDOs have negative Medicare margins or are barely breaking even and the implementation of the Conditions for Coverage will require additional expenditures. To further penalize them by not allowing them to submit data in the same manner as the LDOs is inequitable and unnecessary.

We firmly believe that SDOs and LDOs should be treated the same and all dialysis organizations that have the computer capability should be allowed to batch submit the data. Our position is supported by the Network Executive Directors and the LDOs as well as others in the kidney care community. If the problem stems from the program's software capability, then the data from the 200,000 patients submitted by the LDO's should meet the agency's needs during the initial implementation phase. Another

alternative is to continue the 5 percent sampling from the SDOs until the system allows them to batch submit.

Needless to say, there may be other alternatives that would provide you the data without placing an undue financial burden on the SDOs. I am prepared to meet with you at your earliest convenience to discuss this important matter.

Sincerely,

A handwritten signature in black ink on a light yellow background. The signature appears to read "K. Mentz" in a cursive style.

Keith Mentz
President
National Renal Administrators Association

Cc:
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