

**Nebraska  
Kidney  
Association**

11725 Arbor St., Suite 230 • Omaha, NE 68144 [www.kidneyne.org](http://www.kidneyne.org)  
(402) 932-7200 • NE TOLL FREE (800) 642-1255 • FAX (402) 933-0017

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March 25, 2016

Matt Gelvin, Program Manager  
Licensure Unit – Office of Policy, Research and Quality Improvement  
Division of Public Health  
NE Dept of Health and Human Services  
301 Centennial Mall South, Nebraska State Office Building, 3rd Floor  
P.O. Box 94986  
Lincoln, NE 68509  
(402)471-0145 | [Matthew.Gelvin@nebraska.gov](mailto:Matthew.Gelvin@nebraska.gov)

Dear Mr. Gelvin:

The Nebraska Kidney Association supports the Credentialing Review for Dialysis Patient Care Technicians as submitted by the Nebraska Kidney Coalition on February 23, 2016.

NKA supports the development of a standard national program of education and training for dialysis patient care technicians, preferably in a formal setting, that meets federal CMS guidelines with standardized competency testing and with annual continuing education requirements.

With the adoption of the CMS Conditions of Coverage requirement that all Patient Care Dialysis Technicians be certified after April 15, 2010, NKA applauds the Federal mandate for certification that demonstrated knowledge of a standard body of knowledge.

The grandfathering of technicians who have already earned national certification by one or more of the three available national examinations is our position.

Ensuring that technicians who have completed their first two weeks of classroom training prior to on the job training with dialysis patients in a dialysis facility are registered and then submitting documentation of successful passage of a national dialysis technician certification examination is an appropriate process to be followed.

Sincerely,



Timothy R. Neal  
Chief Executive Officer

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