



EASTERN NEPHROLOGY ASSOCIATES

March 19, 2018

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North Carolina State Health Coordinating Council
Christopher Ullrich, M.D., SHCC Chair
Sandra Greene, Dr.P.H., Acute Care Service Committee Chair
Healthcare Planning and Certificate of Need Section
Division of Health Service Regulation
2714 Mail Service Center
Raleigh, NC 27699-2714

Dear Dr. Ullrich and Dr. Greene,

I serve as a member on the Executive Committee of Eastern Nephrology Associates, an 18 physician nephrology practice serving the entire eastern North Carolina region with 1300 end-stage renal disease patients on dialysis and over 10,000 chronic kidney disease patients.

The physicians of Eastern Nephrology are writing to comment in support of the petition by American Access Care of NC, Eastern Nephrology Associates, Metrolina Nephrology Associates, North Carolina Nephrology, and Azura Vascular Care. Attached are our written comments in support of the petition. As stated in detail in our comments, specialized vascular access care is highly effective and vitally important to the health of dialysis patients. But unless the Council takes action to enable vascular access centers to become licensed as ambulatory surgery centers, patients will have less and less access to this proven care model.

We appreciate this opportunity to comment and we urge the State Health Coordinating Council to approve the petition and remove dedicated vascular access operating rooms from the need methodology for ORs.

Sincerely,



Nathan Saucier, MD
Interventional Nephrologist
Executive Committee Member
Eastern Nephrology Associates, PLLC