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**To:** [DHSR.SMFP.Petitions-Comments](#)  
**Subject:** [External] Change to need methodology  
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In Eastern NC where resources are scarce and where the predominant population is underserved, limiting dialysis chairs and requiring stringent protocols for creating new chairs ultimately restricts care to those who need it most. We need more dialysis chairs, not less. Most importantly we need them in free standing home clinics so that we may continue to serve our pts in these clinics without having to transition them to unfamiliar dialysis units away from their doctors and treatment teams.

The transition from peritoneal dialysis to hemo dialysis is already a time of extreme strife and risk of morbidity and mortality so having the opportunity to keep these pts in their home clinic but able to switch modalities could save resources, time and potentially patient's lives. Because of this it is imperative that the methodology behind the certificate of need changes in a way that supports our underserved patients in these communities and allows for free standing home clinics to include home hemo chairs.

Sincerely,  
Anthony Provenzano MD