

May 1, 2018

Ms. Lisa Pittman, Assistant Chief  
Mr. Greg Yakaboski, Project Analyst  
Healthcare Planning and Certificate of Need Section  
Division of Health Service Regulation  
809 Ruggles Drive  
Raleigh, North Carolina 27603

Re: Public Written Comments,  
CON Project ID # F-11490-18, Marshville Dialysis

Dear Ms. Pittman and Mr. Yakaboski:

Bio-Medical Applications of North Carolina, Inc. offers the following comments on the above referenced Certificate of Need application filed by DVA Healthcare Renal Care Inc.

The application contains information which is factually inaccurate and should be denied. On page 32 of the application, the applicant indicates that it operates two shifts per day, six days per week. My office has called this facility twice within the last month to ascertain their hours of operation. On both occasions, the most recent of which was Monday, April 30, 2018, the facility informed the caller that it only operated three days per week, not six.

The facility is a 10 station dialysis facility. If operating only three days per week, the facility could serve 20 dialysis patients on traditional shifts—10 patients in the morning, and 10 patients in the afternoon.

The State Medical Facilities Plan requires that a dialysis facility be operating at or above the 80% threshold before it can apply for additional stations. This facility can not be operating at 80% if it is operating only three days per week, on the hours as noted within the CON application.

The applicant has provided an application which cannot be approved. Therefore the application must be denied. If you have any questions please contact me at 910-568-3041, or email [jim.swann@fmc-na.com](mailto:jim.swann@fmc-na.com).

Sincerely,



Jim Swann  
Director of Operations, Certificate of Need