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To: [DHSR.SMFP.Petitions-Comments](#)
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Subject: Comments - Graham County Petition for ESRD Facility
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North Carolina Division of Health Service Regulation
Healthcare Planning and Certificate of Need Section
2704 Mail Service Center
Raleigh, NC 27699-2704

Wake Forest Outpatient Dialysis services recognizes the Graham County need for a rural county ESRD Facility in North Carolina. Wake Forest Outpatient Dialysis is in favor of allowing the Adjusted Need Determination request to be published within the January 2017 SDR.

The arguments are strong for the local ESRD residents to request a community ESRD facility within their own county. Distance to outside facilities in Cherokee, Sylva and Murphy are treacherous and time consuming. Community resources are expended in seemingly large and disproportionate dollars as related to ESRD patients vs the balance of the community residents.

However, there are a couple of challenges that any ESRD Provider will have filing a coherent and appropriate CON application for Graham County.

The Need determination calculation listed within the Petition is flawed. Graham County currently has 15 ICH patients listed within the current SDR. Need determination would be $15 \text{ (patients)} * 1.042 \text{ (county growth rate)} = 15.63$ or 16 Then $16 \text{ patients} / 3.2 \text{ station utilization} = 5.00$ Stations. The 5 or 6 stations is vastly different from the 9 stations need listed within the petition. Most ICH facilities are utilized 6 days per week not 5 as listed with the petition. Typical ESRD patients dialyze on a Monday / Wednesday / Friday (MWF) or a Tuesday / Thursday / Saturday (TTS) rotation. Some ESRD patients need more ICH days depending on the individuals physician prescription.

The arguments that Graham County is presenting as reasons to stay within the borders of the county are also an arguments for the personnel of a dialysis provider and the Multi-Disciplinary team (Physician, Nurse, Social Worker, Dietitian, Patient Care Tech, & Patient and or family member). Travel and into and out of Graham County would also be equally challenging for each person working at a potential ESRD facility.

There are not enough patients to financially support the fulltime staffing needs of a facility. Nurse, Social Worker or Dietitian, Patient Care Tech (PCT) and administrative personnel for this location would only be part time. 5 or 6 stations are not sufficient to open a dialysis facility for only 3 days per week. The facility could run 3 shifts per day on MWF, but would not have the ability to accommodate growth and accept any new or transient patients.

Thank you for your consideration of the comments above.

William

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