



August 11, 2020

NC State Health Coordinating Council
Dr. Amy Craddock, Assistant Chief
Ms. Martha Frisone, Chief
Healthcare Planning and Certificate of Need Section
Division of Health Service Regulation
809 Ruggles Drive
Raleigh, North Carolina 27603

Re: Comments by DaVita regarding the Proposed 2021 SMFP, dated July 29, 2020

Dear Members of the State Health Coordinating Council, Dr. Craddock and Ms. Frisone:

The following comments are submitted on behalf of the Fresenius Medical Care and its related dialysis facilities in North Carolina.

1. Policy ESRD-3: We agree with the sentiment of the comments offered by DaVita and suggest that Policy ESRD-3 be modified to include a maximum of four dialysis stations developed by a hospital.

Ms. Fleming notes that *“the spirit of the policy is for hospitals to apply pursuant to ESRD-3 to serve a relatively small and unique subset of patients...”* We certainly agree with this characterization. The small number of patients who might be served by a hospital does not required a significant number of dialysis stations.

2. Inventory of Home Hemodialysis Stations: We agree with the comments offered by DaVita. As more hemodialysis stations are relocated to free-standing home dialysis facilities, it is important that our State health planning process include reporting mechanisms which would allow providers and consumers of health services to know the location and utilization rates of home hemodialysis stations.

Further, the President’s Executive Order on Advancing American Kidney Health (July 10, 2019) has resulted in greater emphasis on home dialysis therapies. Growth of home dialysis is out pacing growth of the overall ESRD patient population.

- At the end of 2018, home dialysis patients represented 12.71% of the dialysis patients reported in the 2020 SMFP.
 - Of these 2,380 home patients, 20.21% were home hemodialysis patients and 79.79% were home peritoneal dialysis patients.

- At the end of 2019, home dialysis patients represented 13.29% of the dialysis patients reported in the Draft 2021 SMFP.
 - Of these 2,563 home patients, 21.93% were home hemodialysis patients and 78.07% were home peritoneal dialysis patients.

The difference is significant. Overall, the home patient population has increased at a greater rate than the ESRD patient population as a whole. And, within the home dialysis patient population, home hemodialysis has increased more rapidly than home peritoneal dialysis. The changes within the dialysis patient population and station utilization favor development of a reporting and recording mechanism specific to home hemodialysis station inventory and utilization.

We appreciate the opportunity to offer public comment on these matters, and look forward to the Staff and Committee recommendations.

Respectfully,



Jim Swann
Director, Certificate of Need