

August 8, 2019

Sandra Greene, D.Ph., Chair Acute Care Committee
North Carolina State Health Coordinating Council
c/o NC Division of Health Service Regulation
Healthcare Planning and Certificate of Need Section
2704 Mail Service Center
Raleigh, NC 27699-2704
DHSR.SMFP.Petitions-Comments@dhhs.nc.gov

Re: Support petition for Adjusted Need Determination for dialysis stations in Orange County

Dear Dr. Greene and members of the Committee:

NCHA represents 130 hospitals and health systems in North Carolina, and we thank you for the opportunity to comment on the petition from UNC Hospitals requesting an adjustment to the need determination for dialysis stations in the North Carolina Proposed State Medical Facilities Plan.

UNC is requesting a need determination to be established in Orange County for four (4) stations on the campus of an acute care hospital and that it demonstrate that the stations will be limited to serving specific categories of patients. UNC has described those categories and has documented the specific reasons why existing dialysis facilities cannot adequately serve pediatric, undocumented, and uninsured patients; those with behavioral health issues and those who, in specific instances, are unable to make their next scheduled outpatient dialysis appointment. The need determination would further condition that the applicant have or be willing to establish a relationship with an existing outpatient dialysis provider in the county to ensure a smooth transition once the patient no longer meets criteria.

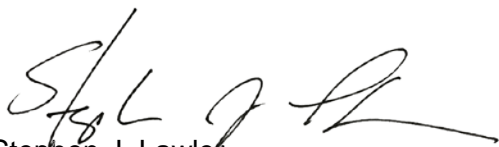
The UNC-proposed facility would differ from other NC dialysis facilities in that it would not be a provider of dialysis services on a long-term basis. Fresenius, the operator of the only outpatient end stage renal disease (ESRD) facility in Orange County, is working with UNC to identify patients that would benefit from hospital-initiated treatments, and is supportive of the proposed special need determination.

UNC has described situations that are familiar to other hospitals in the state. NCHA supports their petition to provide outpatient dialysis stations as it will enable UNC to move forward in developing a certified outpatient program designed to serve patients who would otherwise be unable to access services.

We thank you for your consideration of our comments and ask that you please contact Mike Vicario (mvicario@ncha.org) if you have questions or concerns.



Sincerely,

A handwritten signature in black ink, appearing to read 'S. J. Lawler', written in a cursive style.

Stephen J. Lawler
President
North Carolina Healthcare Association

Cc: Christopher Ullrich M.D., SHCC Chair