
August 11, 2021

North Carolina Division of Health Service Regulation
Healthcare Planning
809 Ruggles Drive
Raleigh, North Carolina 27603
Via email: DHSR.SMFP.Petitions-Comments@dhhs.nc.gov

RE: Comments re: Petition by Carolina Dialysis, LLC to Adjust the Proposed 2022
State Medical Facilities Plan

To Whom it May Concern:

The following comments are offered by Fresenius Medical Care- NA, on behalf of the
Fresenius Medical Care related entities in North Carolina. Those entities are:

Bio-Medical Applications of North Carolina, Inc.
Bio-Medical Applications of Fayetteville, Inc.
Bio-Medical Applications of Clinton, Inc.
FMS ENA Home, LLC
Fresenius Medical Care of Lillington, LLC
Fresenius Medical Care of Morrisville, LLC
Fresenius Medical Care of Rock Quarry, LLC
Fresenius Medical Care of White Oak, LLC
Independent Nephrology Services, LLC
RAI Care Centers of North Carolina II, LLC
Renal Care Group of the South, Inc.

We fully support the petition filed by Carolina Dialysis, LLC on July 28, 2021 requesting
a correction to the Proposed 2022 SMFP ("Petition").

As outlined in the Petition, the Proposed 2022 SMFP incorrectly reports dialysis stations
available for Orange County because it has apparently removed from the inventory
dialysis stations operated within dedicated home dialysis training facilities. Moreover
the Proposed Plan incorrectly reports the number of stations available within Catawba,
Edgecombe, and Mecklenburg Counties for the same reason. The stations operating in
home training facilities in these counties have not been removed from their respective
county, nor have they ceased to be available in the county for dialysis patients.

The SMFP Chapter 9, Assumptions of the Methodology, clearly states that dialysis
stations dedicated to training of home dialysis patients **are included** in the planning
inventory:

2. *Facilities may have been approved to use at least one dialysis station dedicated to training of home dialysis patients. If so, **these stations are included in the planning inventory**. [Emphasis added].*

The SMFP Chapter 9, Assumptions of the Methodology, does not state that dialysis stations at a home-only training facility will be removed from the planning inventory. Dialysis stations operating in dedicated home training facilities still exist and are available. To be consistent with the SMFP, these stations should remain included in the dialysis station inventory of the respective county.

Failure to count dialysis stations operated in home training facilities is inconsistent with the SMFP and results in an unfounded reduction in the dialysis station planning inventory. Therefore, the SHCC and DHSR/Healthcare Planning should correct Table 9B of the Proposed 2022 State Medical Facilities Plan (the Proposed Plan).

If you have any questions please contact me at 910-514-2439, or email jim.swann@fmc-na.com.

Sincerely,



Jim Swann
Director of Operations, Certificate of Need