



**FRESENIUS
MEDICAL CARE**

May 1, 2014

Received by
the CON Section
APR 30 2014

Ms. Martha Frisone, Chief
Certificate of Need Section
Division of Health Service Regulation
809 Ruggles Drive
Raleigh, NC 27603

Re: Public Written Comments
CON Project ID # G-10262-14, North Randolph Dialysis Center
CON Project ID # G-10265-14, Graham Dialysis

Dear Ms. Frisone:

The attached Public Written Comments are forward for consideration by the CON Project Analyst conducting the respective review. If you have any questions regarding these comments please feel free to contact me.

Respectfully,

Jim Swann
Director of Operations, Certificate of Need



1. The applicant has provided questionable and inconsistent information with regard to the patient origin. Consequently, the applicant should be found non-conforming to Review Criterion 3.

The applicant has included the following table on page 22 of the application.

WFUHS RANDOLPH COUNTY PATIENTS

FACILITY	ICH	HOME
HPKC	23	8
TVDC	15	0
TDC	1	0
LXDC	0	4
PDC	0	1
TOTAL	39	13
Total Randolph County Patients Reported in the January 2014 SDR	161	16
WFUHS Randolph County Patients as a Percentage of All Randolph County Patients Reported in the January 2014 SDR	24.22%	81.25%

Source: Application

However, this information is not consistent with the DHSR / Medical Facilities Planning Section, Patient Origin Report which was available on December 31, 2013. The Patient Origin Report is derived from provider reported data, for the period ended June 30, 2013. This same information led to the formulation of the January 2014 SDR.

There are several inconsistencies between the above table, and the Patient Origin Report. The Patient Origin Report includes the following information regarding providers who were serving ESRD patients of Randolph County as of June 30, 2013 (the same date as reported for the January 2014 SDR). A copy of the Patient Origin Report from DHSR / Medical Facilities Planning is attached as Attachment 1.

Facilities serving residents of Randolph county					
Provider Number	Facility Name	Facility County	Home Patient	In-Center Patient	County Total
34-2524	BMA of Asheboro	Randolph	0	104	104
34-2639	Thomasville Dialysis Center	Davidson	0	33	33
34-2621	Carolina Dialysis Siler City	Chatham	0	9	9
34-2514	High Point Kidney Center	Guilford	7	0	7
34-2504	BMA of Greensboro	Guilford	6	1	7
34-2600	BMA of Southwest Greensboro	Guilford	0	4	4
34-2553	Lexington Dialysis Center	Davidson	2	2	4
34-2537	BMA of South Greensboro	Guilford	0	3	3
34-2599	Triad Dialysis Center	Guilford	0	3	3
24-2567	Burlington Dialysis	Alamance	0	1	1
34-2555	Dialysis Care of Moore County	Moore	1	0	1
34-2533	BMA Burlington	Alamance	0	1	1
Randolph Totals			16	161	177

Source: Patient Origin Report

The next table illustrates the differences between the Patient Origin Report and the information provided by the applicant:

Patient Origin Report					Information from the Applicant		
Facility Name	Facility County	Home Patient	In-Center Patient	County Total	Home Patient	In-Center Patient	Total
Thomasville Dialysis Center	Davidson	0	33	33	0	15	15
High Point Kidney Center	Guilford	7	0	7	8	23	31
Lexington Dialysis Center	Davidson	2	2	4	4	0	4
Triad Dialysis Center	Guilford	0	3	3	0	1	1
Piedmont Dialysis Center	Forsyth				1	0	1
Randolph Totals		9	38	47	13	39	52

The above table clearly depicts the inconsistency between the information provided by the applicant which led to development of the January 2014 SDR, and the information provided within the application.

Information within CON applications is routinely evaluated by the Certificate of Need Project Analyst. Ms. Frisone, Interim Chief of CON, recently testified at a CON Contested Case Hearing that the information within the application should be "reasonable, supported and credible". In the instant case, the information provided is inconsistent with other information provided by, or on behalf of, the applicant.

This inconsistency should lead the CON Analyst to determine the information to be less than credible, and therefore non-conforming to CON Review Criterion 3.

2. The applicant has failed to adequately report required capital expenditures for the project. The applicant has proposed to transfer dialysis machines and chairs (equipment) from the High Point Kidney Center to the new center (see application page 50, Footnote 17). Yet, the applicant has not proposed any capital cost for this equipment.

It is not sufficient to say that there is no capital cost because the equipment has been purchased by another entity within the WFUHS system and will be transferred to the new facility. NC GS 131E-176 defines capital expenditure to include the fair market value of the equipment which would have been considered a capital expenditure if the person had acquired it by purchase:

(2d) "Capital expenditure" means an expenditure for a project, including but not limited to the cost of construction, engineering, and equipment which under generally accepted accounting principles is not properly chargeable as an expense of operation and maintenance. Capital expenditure includes, in addition, the fair market value of an acquisition made by donation, lease, or comparable arrangement by which a person obtains equipment, the expenditure for which would have been considered a capital expenditure under this Article if the person had acquired it by purchase.

[emphasis added by BMA].

Failure to report the fair market value of the dialysis machines and chairs must result in a finding of nonconforming to CON Review Criterion 5.

3. BMA suggests that the applicant has understated the cost of development for the facility and consequently fails to conform to CON Review Criterion 5. In the table of development costs on page 51 of the application includes only \$36,700 for architect and engineering fees. These costs appear to be unusually low for development of a project such as this. Moreover, the costs do not seem to be included within another line item in the table of costs; consider the line directly above for landscaping costs which clearly includes a note indicating these costs are included within the construction contract. Absent such an indication, one must conclude the architect fees are not included elsewhere.

Recent CON applications filed by BMA and DaVita have reported significantly higher costs associated with architect and engineering fees. The following table illustrates just a few of the applications for new facilities filed in recent years. Each of these projects is for development of a new dialysis facility with a home dialysis program, similar to proposed North Randolph project.

Public Witten Comments
 CON Project ID # G-10262-14
 North Randolph Dialysis Center of Wake Forest University
 Prepared and Submitted by Jim Swann
 FMC Director of Operations, Certificate of Need

CON Project ID #	Applicant	Project Name	Square footage	Total Capital Costs	Architect and Engineering Costs	A&E % of Total Costs
G-10264-14	WFUHS	North Randolph	10286	\$ 3,295,700	\$ 36,700	1.11%
D-10247-14	BMA	FMC Watauga	10835	\$ 1,997,121	\$ 123,925	6.21%
G-10265-14	DaVita	Graham Dialysis	10800	\$ 2,172,477	\$ 115,000	5.29%
F-10219-13	DaVita	Huntersville Dialysis	9600	\$ 1,983,114	\$ 134,100	6.76%
L-10177-13	BMA	FMC South Rocky Mount	9411	\$ 1,679,564	\$ 99,352	5.92%
J-10152-13	BMA	FMC Northern Wake	9308	\$ 3,374,036	\$ 90,624	2.69%
K-10099-13	BMA	FMC Tar River	8000	\$ 1,518,384	\$ 89,949	5.92%
P-10051-12	BMA	FMC Sea Spray	7656	\$ 1,369,725	\$ 74,368	5.43%
N-10201-13	DaVita	Scotland Dialysis	7400	\$ 1,574,227	\$ 75,000	4.76%
L-10211-13	DaVita	Nash County Dialysis	7400	\$ 1,589,227	\$ 75,000	4.72%
R-10176-13	DaVita	Albemarle Dialysis	6823	\$ 1,796,866	\$ 70,000	3.90%
K-10126-13	DaVita	Youngsville Dialysis	6500	\$ 1,260,489	\$ 60,000	4.76%
Average of BMA and DaVita A&E Costs:						
					\$	5.12%

With the exception of the WFUHS North Randolph application (first application in the table), this table is rank ordered by square footage of the facility (it could have been rank ordered in any number of ways). As this table demonstrates, other recent proposals for new dialysis facilities which included home therapies (both BMA and DaVita), the typical architect and engineering fees average greater than 5% of the total capital costs. Thus one should assume that the costs reported by BMA and DaVita are typical for the industry. Consequently, it appears that WFUHS has under reported its probable architect fees for this project. Thus the projected costs of the applicant should be considered unreliable. Further, to the extent that such projected costs are unreliable, the application should be found nonconforming to CON Review 5.

4. The applicant has failed to report property taxes for the facility real property. The Randolph County property tax rate is \$0.61 per \$100 valuation (See Attachment 2 for Randolph County tax valuation information). The \$0.61 tax rate is just the Randolph County rate and does not include local and/or fire protection tax rates. In this case the applicant is projecting to develop a facility valued at \$3,295,700 (applicant's estimate of development costs). Property taxes just for the Randolph County assessment would exceed \$20,000 annually.

Failure to appropriately account for all probable expenses of the facility must cause the CON Project Analyst to question the reliability of the financial projections of the applicant. If the financial projections are questionable, the application should be found nonconforming to CON Review Criterion 5.

5. The applicant has indicated in Section X of the application, on page 57) that the Medicare Allowable Charge for dialysis is \$245. The applicant has indicated on page 74 that calendar year 2016 is the projected Operating Year 1 of this project, and calendar year 2017 is the projected Operating Year 2. However, the applicant has continued to use the current Medicare reimbursement rates and has not provided any indication of the projected decreases in Medicare reimbursement for dialysis.

Medicare has indeed proposed a 12% cut in drug payments for ESRD care (See Attachment 3). This reduction for dialysis treatment was announced on November 22, 2013, and is scheduled to go into effect beginning in 2016.

The applicant should have been aware of the proposed reductions in reimbursement. Consequently the applicant should have projected lower Medicare allowable rates for 2016 and forward. As a result of using the current Medicare allowable and failing to use a lower rate for future years, the applicant has overstated revenues to be earned by the facility. The application is therefore not based upon credible information and should be found non-conforming to CON Review Criterion 5.

6. The applicant has proposed questionable staffing for its home training program. The applicant has proposed to serve an average of 19 home patients in Operating Year 2 with only 0.5 FTE for home training. This equates to 38 patients to one FTE for the home training RN. This is an unmanageable staffing ratio. The applicant suggests:

“The home dialysis training nurse, and RN specializing in the training and care of home dialysis patients, will instruct and oversee the home dialysis patient’s training to ensure proper techniques and care are taken when treatments are performed.”

The CON Analyst must consider the representations of the applicant, as expressed within the application. In this case, the applicant is suggesting that a 0.5FTE RN can provide training for the home training patients who require training, or re-training visits, manage the patients for their monthly office visit, manage to visit each patient in the home on an annual basis, manage call from patients with problems/questions, and also perform the routine nursing duties associated with a home training program of this size.

BMA has reviewed several other recent CON applications by both BMA and DaVita with regard to home training staffing and numbers of patients to be served. Consider the following:

CON Project ID #	Applicant	Project Name	Home Patients	Operating Year 2 Home Training FTE
G-10264-14	WFUHS	North Randolph	20	0.5
D-10247-14	BMA	FMC Watauga	24.8	1.7
G-10265-14	DaVita	Graham Dialysis	28	1
F-10219-13	DaVita	Huntersville Dialysis	5	0.5
L-10211-13	DaVita	Nash County Dialysis	9	0.4
N-10201-13	DaVita	Scotland Dialysis	1	0.4
L-10177-13	BMA	FMC South Rocky Mount	35	3
R-10176-13	DaVita	Albemarle Dialysis	41	3
J-10152-13	BMA	FMC Northern Wake	12	1
K-10126-13	DaVita	Youngsville Dialysis	11	1
K-10099-13	BMA	FMC Tar River	8	0.75
P-10051-12	BMA	FMC Sea Spray	14	1
Average BMA and DaVita New Facilities			17.2	1.3

BMA suggests the proposed staffing for the home training program is insufficient to ensure quality care is provided to the home patient population proposed to be served. Failure to provide sufficient staffing should cause the CON Analyst to deem the project nonconforming to CON Review Criterion 7.

- In addition to insufficient home training staff, the applicant appears to have fallen short of its stated staffing plan for Operating Year 2. The applicant represents in Section VII of the application that it proposes to staff the facility at no more than one direct care staff person, per three patients.

“In the above charts, the first number represents the number of patients for the shift and the second number represents the number of staff members assigned for the shift. Please note that the average number of patients to staff will be no more

than three (3) patients per direct care staff members, which further emphasizes the commitment of the facility to providing safe, quality care to the ESRD patient."

Application page 49, last paragraph.

In the NRDC OY1 Projected Schedule on page 49, the applicant clearly represents that it will provide a 1:3 staffing ratio. However, the applicant has not provided any allowance for additional staff which would be required in order for the applicant to maintain such staffing levels for Operating Year 2.

The Chart is specific to Operating Year 1 and 52 patients. In Operating Year 2 the applicant projects to serve 57 in-center patients. Assuming the same 1:3 staffing ratio, the applicant would need to hire at least one additional staff member for the evening shift in Operating Year 2. However, the applicant has not provided any indication in the table at VII.1 or X.5 that additional staff would be hired.

As an additional consideration, to the extent that the applicant proposes to hire additional staff, such should be reflected within the application and the salary/benefit costs of that staff member should be reflected. Absent any projection of such addition to the staffing, the applicant has failed to account for all probable expenses, and is therefore nonconforming to CON Review Criterion 5.

8. The applicant has stated in several locations throughout the application that it will be offering home dialysis. This is clearly stated in the response to I.8 where the applicant defines the scope of the project. Further, the applicant proposes to serve home patients as discussed in the response to III.7. The applicant also indicates in its financial projections within Section X of the application that it will serve home patients. Finally, the applicant has provided a floor plan in Attachment T which reflects 10 dialysis stations within the in-center treatment area and three home training suites. The applicant includes the following statement in response to V.2.d on page 32:

"NRDC will provide ICH services as well as home dialysis training and support services for all modalities of dialysis, offering a full range of dialysis options to its patients."

Clearly the applicant is planning to include home hemodialysis training and support.

The CON Section has historically indicated that home hemodialysis training requires a dialysis station. Further, the CON Section has also indicated that home hemodialysis stations are not dual use stations, meaning that the station must be dedicated to the provision of home hemodialysis training and support even during periods when a home patient is not in training.

This necessarily results in a corresponding reduction in the number of in-center dialysis stations. Thus, a new 10 station dialysis facility, constructed as the applicant suggests would realize its station allocation as follows:

In-Center Dialysis Stations	8
Isolation/Separation	1
Home hemodialysis	1
<hr/>	<hr/>
Total Stations	10

The applicant has proposed to develop 10 stations and a home hemodialysis station for a total of 11 stations at the center. Consequently the applicant has proposed to develop more than the 10 stations as indicated. Thus, the applicant is non-conforming to Policy ESRD 2. Development of 11 dialysis stations would result in a surplus of stations in Randolph County. The application should be denied.

9. In addition to the preceding discussion regarding the home hemodialysis training station, BMA notes that the applicant has suggested it would provide dialysis care and treatment for an average of 52 in-center dialysis patients in Operating Year 1, and an average of 57 in-center dialysis patients in Operating Year 2. This proposal seems dubious in light of the CON Section historical approach to home hemodialysis training stations.

Utilization of one station for dedicated home hemodialysis training and support obviously leaves nine stations for the in-center dialysis program. Assuming for moment that no patients will require dialysis in an isolation/separation area, 100% capacity for the facility, with three daily shifts as suggested by the applicant, is a maximum of 54 patients (9 stations X 6 weekly shifts = capacity for 54 patients). How would the applicant propose to dialyze more than 54 patients?

The applicant could propose to operate an additional overnight dialysis shift. However, the applicant has not offered any such indication, nor has the applicant provided appropriate levels of staffing for operation of an overnight shift.

The applicant could propose shorter dialysis treatment times in order to provide treatment for more patients throughout the day. In-center dialysis treatment averages four hours per patient. Shorter treatments potentially compromise the quality of care provided to the patient. It is doubtful that the applicant would propose to compromise quality of care. Therefore the applicant has apparently not fully considered all dynamics associated with the operation of the facility. Thus this proposal would seem to be not the best alternative and is therefore nonconforming to CON Review Criterion 4.

10. The application is internally inconsistent with regard to the proposed site of development. The applicant has indicated that its primary site is:

1449 E. Sunrise Avenue, Thomasville, NC 27360

However, the letter from Shelco included in Attachment T indicates that Shelco is offering a quote for a site in Trinity, NC. The applicant has not made a single representation of developing a facility in Trinity. While the applicant did identify three sites, the primary site was identified to be within Thomasville, and the secondary and tertiary sites were identified with addresses in High Point. The letter from Shelco was dated February 14, 2014, fully one month before the application was filed. If this was an error, the applicant had ample time to obtain a corrected letter.

This inconsistency must cause the CON Project Analyst to question the credibility of the information provided. Where exactly does the applicant propose to develop the project?

The applicant has not provided any information to support development of the project at another location for the same costs. The information provided by the applicant should lead the CON Analyst to determine the application to be non-conforming to CON Review Criterion 12.

11. The applicant is proposing to duplicate existing health services by the relocation of the home dialysis program to Randolph County. BMA Asheboro has an existing home dialysis training and support program. Unlike in-center dialysis stations which have a finite capacity, home dialysis programs have no restrictions on the number of patients which could be trained and supported. BMA Asheboro has a home training program with an adequate number of training rooms to support the home dialysis patient population of Randolph County. The applicant is proposing to duplicate existing services and is therefore not conforming with Criterion 6.
12. The applicant has not demonstrated how the development of this facility will have a positive impact upon the cost effectiveness, quality, and access to the services proposed. As noted within the WFUHS application, BMA Asheboro currently has capacity for additional dialysis patients. Further, and as will be seen in the comparative analysis discussion which follows, the applicant does not have lower operating costs on a per treatment basis. And, the applicant's proposal on a per station basis is far and above a more costly proposal than that offered by BMA. Therefore the applicant should be found non-conforming to Criterion 18A.

COMPARATIVE ANALYSIS

In addition to the preceding discussion regarding nonconformities with Policy ESRD-2, and CON Review Criteria 3, 4, 5, 6, 7, 12, and 18A. BMA notes that because this is a competitive application, the CON Analyst will also prepare a comparative analysis. BMA understanding is that there is no single exhaustive list of factors to be use within the comparative analysis. A review of recent competitive ESRD reviews does indicate some common areas which have been used. BMA considered the 2010 Randolph and Cabarrus reviews, the 2011 Harnett and Northampton reviews, the 2012 Macon County review, and the 2013 Nash and Scotland reviews. From these, BMA offers the following for consideration by the Analyst:

Access by underserved groups

The CON Agency has historically looked to payor mix information for an indication of service to Medicare and/or Medicaid recipients. In this review the analyst will note that the applicant has provided its payor mix in an aggregate form while BMA has provided separate payor classifications for the home and in-center program. In order to perform a comparison of similar projections it would be necessary to evaluate both applicants in with an analysis of the aggregate payor mix (it is not possible to separate the home and in-center projections of the applicant, but it is possible to combine the BMA projections). The following information demonstrates one way in which to aggregate the BMA projections (so that a comparison of similar projections may be made)¹. As the Analyst will note, BMA has projected a slight change in the payor classifications for Operating Year 2. BMA offers the following as a comparison for Operating Year 2

Step 1: Determine the number of treatments for in-center and home by payor classification. This information is obtained from the In-Center and Home revenue projections included in Section X of the BMA application.

Step 2: Aggregate the total treatments for the facility by adding the number of treatments within each payor classification.

¹ BMA notes that this was not a part of the BMA application and that this is in no way intended to change the representations of the information within the BMA application. Rather this is merely an effort to assist the CON Analyst with conducting a comparative analysis of the two competing applications, such that the two applications can be fairly evaluated. BMA also notes that to the best of BMA knowledge, there are no rules or policies of the CON Agency which preclude such an analysis by the Analyst.

Step 3: Determine percentages by dividing the number of treatments within each payor classification by the number of total treatments to be performed for the year.

Operating Year 2 Payor Classification	In-Center		Home		Aggregate	
	Treatments	%	Treatments	%	Treatments	%
Private Pay	0	0.00%	0	0.00%	0	0.00%
Commercial Insurance	1866	7.94%	340	18.17%	2206	8.70%
Medicare	15321	65.24%	995	53.13%	16315	64.35%
Medicaid	1447	6.16%	0	0.00%	1447	5.71%
VA	1197	5.10%	0	0.00%	1197	4.72%
Medicare / Medicaid	0	0.00%	0	0.00%	0	0.00%
Medicare / Commercial	3482	14.83%	537	28.70%	4019	15.85%
State Kidney Program	0	0.00%	0	0.00%	0	0.00%
Other: Self/Indigent	170	0.73%	0	0.00%	170	0.67%
Total	23483	100.00%	1872	100.00%	25355	100.00%

Development of the above aggregate payor mix for BMA will allow the Analyst to compare the BMA payor mix to the WFUHS projected payor mix for Operating Year 2.

Operating Year 2 Payor Classification for both applications		
	WFU HS	BMA
Private Pay	0.0%	0.00%
Commercial Insurance	4.0%	8.70%
Medicare	11.0%	64.35%
Medicaid	4.0%	5.71%
Medicare / Medicaid	27.0%	0.00%
Medicare / Commercial	36.0%	15.85%
State Kidney Program	0.0%	0.00%
VA	11.0%	4.72%
Medicare Advantage	7.0%	
Other: Self/Indigent	0.0%	0.67%
Total	100.00%	100.00%

The side-by-side comparison is not sufficient to provide a complete analysis of the projections of service Medicare and Medicaid beneficiaries. Because of the way in which Medicare is reported on several lines, it is appropriate to sum the percentages for the following:

	WFUHS	BMA
Medicare	11.0%	64.35%
Medicare / Medicaid	27.0%	0.0%
Medicare / Commercial	36.0%	15.85%
Medicare Advantage*	7.0%	NA
Total	81.0%	80.2%

At this point it is appropriate to consider the two applications for a comparative analysis:

Historically Underserved	WFUHS	BMA
Medicare	81.0%	80.2%
Medicaid	4.0%	5.71%
Total	85.0%	85.91%

BMA proposes to serve slightly more of the traditionally underserved populations.

Revenues and Operating Costs

WFUHS and BMA have reported information within Table X.2 in different fashion. For example WFUHS includes Indigent Care and Bad Debt within X.2, whereas BMA has accounted for these items as operating expenses in X.4. Additionally, WFUHS records all revenue before Contractual Allowances whereas BMA only records Contractual Allowances for Private Pay, Commercial Insurance, Self/Indigent Care, and Drug Administration; BMA does not book contractals for Medicare, Medicaid, and VA. Therefore in order to do a comparison of revenues from a neutral position, it would be necessary to reform the reporting by WFUHS to align with the manner in which BMA has reported Revenues in the table at X.2.

The subject reformation would simply be a matter backing (or, not including) the Indigent Care and Bad Debt out of the table at X.2 and then adding those to the table of expenses at X.4. Following this process would allow the Analyst to compare Net Patient Services Revenues and also will allow a corresponding analysis of the operating expenses for both applicants. The following table represents the reformation of revenues:

	Operating Year 1	Operating Year 2
Total Gross Patient Services Revenue	\$ 14,428,212	\$ 16,365,946
Contractual Allowances	\$ 11,603,596	\$ 13,239,293
Net Patient Services Revenue	\$ 2,824,616	\$ 3,126,653

At this point, a comparison of Net Revenues can be performed.

- a. In performing this analysis, BMA has relied upon the applicant's table on page 62, wherein the applicant has established the Total Hemo-Equivalent Treatments. The applicant has calculated that the proposed facility would perform 10,034 treatments for Operating Year 1 and 11,050 treatments for Operating Year 2.
- b. BMA has projected to provide a total of 22,737 treatments (21,441 in-center and 1,296 home treatments) for Operating Year 1, and 25,355 (23,488 in-center and 1,872 home treatments) for Operating Year 2.

Net Revenue Comparison	WFUHS		BMA	
	Operating Year 1	Operating Year 2	Operating Year 1	Operating Year 2
Net Patient Services Revenue	\$ 2,824,616	\$ 3,126,653	\$ 7,061,697	\$ 7,756,347
Total Treatments	10,034	11,050	22,737	25,355
Net Patient Revenue per Treatment	\$ 281.50	\$ 282.96	\$ 310.58	\$ 305.90

The CON Agency has traditionally also conducted a comparative analysis of operating expenses. As noted in the previous discussion on Net Revenue, the operating expenses for the WFUHS proposal must be adjusted to include the Indigent Care and Bad Debt within the table expenses at X.4. This is accomplished by adding these two line items to the expenses already recorded in the table at X.4.

WFUHS	Operating Year 1	Operating Year 2
From the application, X.4 Total Operating Costs	\$ 2,502,890	\$ 2,678,921
Indigent Care	20,199	22,912
Bad Debt	230,851	261,855
Adjusted Operating Costs	\$ 2,753,940	\$ 2,963,688

At this point, a comparison of Net Revenues can be performed.

- a. In performing this analysis, BMA has again relied upon the applicant's table on page 62, wherein the applicant has established the Total Hemo-Equivalent Treatments.
- b. BMA similarly utilized the same number of projected treatments.

Operating Cost Comparison	WFUHS		BMA	
	Operating Year 1	Operating Year 2	Operating Year 1	Operating Year 2
Total Operating Costs	\$ 2,753,940	\$ 2,963,688	\$ 5,873,438	\$ 6,377,763
Total Treatments	10,034	11,050	22,737	25,355
Operating Costs per Treatment	\$ 274.46	\$ 268.21	\$ 258.32	\$ 251.53

Thus, a comparison of Revenues and Operating Costs on a per treatment basis indicates that WFUHS generates a lower amount of net revenue per treatment. BMA incurs a lower operating cost per treatment.

Staff Salaries

In past competitive reviews the CON Agency has also compared direct patient care staff salaries. In some reviews the Agency has also compared the salary of the nurse manager for the dialysis facility. The following information is from the WFUHS application and BMA application. BMA notes that both applicants propose an average 3% annual staff salary increase. Thus, BMA offers only a comparison of Operating Year 2 salaries.

Position	WFUHS	BMA
Nurse Manager	\$ 32.90	\$ 38.25
Dialysis RN	\$ 28.80	\$ 29.11
Home Training RN	\$ 28.80	\$ 30.24
Patient Care Technician	\$ 13.85	\$ 13.81

In all cases above, the Operating Year 2 salary per FTE, as reported in the table at VII.1 of the application, is divided by 2080 annual operating hours. In all cases, BMA projects to provide a higher staff salary.

Capital Cost per station

As an additional consideration for comparative factors, BMA urges the CON Agency to consider the capital expenditure required for development. The WFUHS project calls for a capital expenditure of \$3,295,700 or, \$329,570 per station for 10 stations. BMA on the other hand proposes a total capital expenditure of only \$15,750 for two stations, or \$7,875 per station. Clearly the BMA proposal is a much more cost effective approach.

BMA is cognizant of the fact that the WFUHS proposal includes home training suites. For the sake of providing an equivalent comparison, BMA will assume that only the nurses station (327 square feet), pre-assessment area (162 square feet), in-center treatment area (1,202) square feet and the isolation station (238 square feet) are all that is required for the stations. BMA calculates this to be 1,929 square feet, or 18.75% of the total facility square footage. Assuming a pro-rata share of the building, the 18.75% of the cost is equivalent to \$618,064, or \$61,806 per station. This figure remains significantly higher than the BMA costs of \$7,875 per station.

SUMMARY:

BMA suggests the application by WFUHS fails on multiple levels and should not be approved. As discussed within these comments, the applicant proposes more than 10 stations at the proposed facility and therefore fails to conform to Policy ESRD-2. In addition, BMA suggests the applicant fails to conform to CON Review Criteria 3, 4, 5, 6, 7, 12, and 18A. Finally within the Comparative Analysis provided by BMA the applicant proposes higher operating costs, and proposed lower salaries for dialysis staff.

For these reasons, the application should be denied.

Provider Number	Facility Name	Facility County	Home Patient	In-Center	County Total
Facilities serving residents of Alamance County					
34-2533	BMA Burlington	Alamance	3	92	95
34-2567	Burlington Dialysis	Alamance	0	66	66
34-2686	North Burlington Dialysis	Alamance	21	45	66
34-2691	FMC Mebane	Alamance	6	28	34
34-2622	Carolina Dialysis Carrboro	Orange	4	6	10
34-2597	Renal Care Group - Caswell	Caswell	0	4	4
34-2616	Durham West Dialysis	Durham	3	1	4
34-3504	Duke Hospital Dialysis	Durham	2	1	3
34-2599	Triad Dialysis Center	Guilford	0	1	1
34-2538	Freedom Lake Dialysis Unit	Durham	0	1	1
34-2590	FMC Dialysis Services West Pettigrew	Durham	1	0	1
Alamance Totals			40	245	285
Facilities serving residents of Alexander County					
34-2687	FMC of Alexander County	Alexander	1	13	14
34-2636	West Iredell Dialysis Center	Iredell	0	11	11
34-2635	FMC of Catawba Valley	Catawba	0	5	5
34-2516	FMC of Hickory	Catawba	0	3	3
34-2657	INS Statesville	Iredell	2	0	2
34-2527	Statesville Dialysis Center	Iredell	1	1	2
34-2313	Wilkes Regional Dialysis Center	Wilkes	0	1	1
Alexander Totals			4	34	38
Facilities serving residents of Alleghany County					
34-2614	Elkin Dialysis Center	Surry	0	6	6
34-2551	Mt Airy Dialysis Center	Surry	0	1	1
Alleghany Totals			0	7	7
Facilities serving residents of Anson County					
34-2673	FMC Anson County	Anson	0	33	33
34-2560	Dialysis Care of Anson County	Anson	0	30	30
34-2666	Marshville Dialysis Center	Union	0	11	11
34-2526	Union County Dialysis	Union	3	0	3
34-2539	Dialysis Care of Richmond County	Richmond	0	1	1
Anson Totals			3	75	78
Facilities serving residents of Ashe County					
34-2674	FMC Watauga County	Watauga	6	14	20
34-2313	Wilkes Regional Dialysis Center	Wilkes	0	2	2
34-2509	BMA Lenoir	Caldwell	1	0	1
Ashe Totals			7	16	23
Facilities serving residents of Avery County					
34-2674	FMC Watauga County	Watauga	3	7	10
Avery Totals			3	7	10
Facilities serving residents of Beaufort County					
34-2561	FMC Pamlico	Beaufort	14	70	84
34-2596	FMC Dialysis Services East Carolina University	Pitt	1	4	5
34-2502	Greenville Dialysis Center	Pitt	0	5	5
34-2585	FMC Craven County	Craven	3	0	3
34-2534	New Bern Dialysis	Craven	0	2	2

Provider Number	Facility Name	Facility County	Home Patient	In-Center	County Total
34-2618	FMC Dialysis Services Plymouth	Washington	0	1	1
Beaufort Totals			18	82	100
Facilities serving residents of Bertie County					
34-2547	Windsor Dialysis Unit	Bertie	0	36	36
34-2570	Ahoskie Dialysis	Hertford	0	17	17
34-2502	Greenville Dialysis Center	Pitt	3	0	3
34-2586	FMC East Northampton County	Northampton	0	3	3
34-2601	FMC Dialysis Services South Ramsey	Cumberland	0	1	1
Bertie Totals			3	57	60
Facilities serving residents of Bladen County					
34-2578	Southeastern Dialysis Center - Elizabethtown	Bladen	6	66	72
34-2528	Lumberton Dialysis Unit	Robeson	0	4	4
34-2521	Southeastern Dialysis Center-Whiteville	Columbus	0	3	3
34-2628	Chadbourn Dialysis Center	Columbus	0	2	2
34-2559	BMA of Clinton	Sampson	0	2	2
34-2662	FMC St. Pauls	Robeson	0	2	2
34-2596	FMC Dialysis Services East Carolina University	Pitt	0	1	1
34-2511	Southeastern Dialysis Center - Wilmington	New Hanover	1	0	1
34-2688	FMC of Roseboro	Sampson	0	1	1
34-2651	St. Pauls Dialysis Center	Robeson	0	1	1
Bladen Totals			7	82	89
Facilities serving residents of Brunswick County					
34-2582	Southeastern Dialysis Center - Shallotte	Brunswick	13	42	55
34-2669	Southport Dialysis Center	Brunswick	0	34	34
34-2511	Southeastern Dialysis Center - Wilmington	New Hanover	17	11	28
34-2685	Cape Fear Dialysis	New Hanover	0	11	11
34-2521	Southeastern Dialysis Center-Whiteville	Columbus	0	3	3
34-2689	FMC Brunswick County	Brunswick	0	3	3
Brunswick Totals			30	104	134
Facilities serving residents of Buncombe County					
34-2506	Asheville Kidney Center	Buncombe	45	174	219
34-2604	Weaverville Dialysis	Buncombe	0	27	27
34-2527	Statesville Dialysis Center	Iredell	1	0	1
34-2629	Waynesville Dialysis Center	Haywood	0	1	1
34-2556	Sylva Dialysis Center	Jackson	0	1	1
Buncombe Totals			46	203	249
Facilities serving residents of Burke County					
34-2563	BMA of Burke County	Burke	8	78	86
34-2516	FMC of Hickory	Catawba	6	5	11
34-2527	Statesville Dialysis Center	Iredell	2	0	2
34-2657	INS Statesville	Iredell	1	0	1
34-2645	McDowell Dialysis Center	McDowell	0	1	1
34-2509	BMA Lenoir	Caldwell	0	1	1
Burke Totals			17	85	102
Facilities serving residents of Cabarrus County					
34-2631	Copperfield Dialysis	Cabarrus	0	68	68
34-2670	Harrisburg Dialysis Center	Cabarrus	7	46	53

Provider Number	Facility Name	Facility County	Home Patient	In-Center	County Total
		Rowan	17	32	49
34-2592	Dialysis Care of Kannapolis	Stanly	0	8	8
34-2565	BMA Albemarle	Mecklenburg	1	4	5
34-2591	DSI Glenwater Dialysis	Mecklenburg	3	0	3
34-2503	FMC Charlotte	Iredell	0	3	3
34-2606	Lake Norman Dialysis Center	Mecklenburg	0	2	2
34-2306	Carolinas Medical Center	Mecklenburg	1	1	2
34-2548	Charlotte Dialysis	Mecklenburg	0	1	1
34-2549	BMA of North Charlotte	Mecklenburg	0	1	1
34-2681	FMC Matthews	Mecklenburg	1	0	1
34-2655	INS Charlotte	Mecklenburg	1	0	1
34-2654	INS Huntersville		31	166	197
Cabarrus Totals					
Facilities serving residents of Caldwell County					
34-2509	BMA Lenoir	Caldwell	6	90	96
34-2516	FMC of Hickory	Catawba	4	5	9
34-2563	BMA of Burke County	Burke	2	0	2
34-2636	West Iredell Dialysis Center	Iredell	0	1	1
			12	96	108
Caldwell Totals					
Facilities serving residents of Camden County					
34-2515	Elizabeth City Dialysis	Pasquotank	2	11	13
			2	11	13
Camden Totals					
Facilities serving residents of Carteret County					
34-2588	Crystal Coast Dialysis Unit	Carteret	0	67	67
34-2585	FMC Craven County	Craven	9	0	9
34-2532	Southeastern Dialysis Center- Jacksonville	Onslow	5	0	5
			14	67	81
Carteret Totals					
Facilities serving residents of Caswell County					
34-2597	Renal Care Group - Caswell	Caswell	0	18	18
34-2562	Roxboro Dialysis	Person	0	6	6
34-2641	Rockingham Kidney Center	Rockingham	0	3	3
34-2536	Dialysis Care of Rockingham County	Rockingham	1	0	1
34-2567	Burlington Dialysis	Alamance	0	1	1
			1	28	29
Caswell Totals					
Facilities serving residents of Catawba County					
34-2516	FMC of Hickory	Catawba	16	97	113
34-2635	FMC of Catawba Valley	Catawba	0	65	65
34-2606	Lake Norman Dialysis Center	Iredell	2	3	5
34-2568	FMC Lincolnton	Lincoln	0	4	4
34-2636	West Iredell Dialysis Center	Iredell	0	3	3
34-2527	Statesville Dialysis Center	Iredell	2	0	2
34-2505	Piedmont Dialysis Center	Forsyth	1	1	2
34-2656	INS Iredell County	Iredell	1	0	1
34-2525	Metrolina Kidney Center	Union	0	1	1
34-2503	FMC Charlotte	Mecklenburg	0	1	1
34-2687	FMC of Alexander County	Alexander	0	1	1
			22	176	198
Catawba Totals					
Facilities serving residents of Chatham County					

Provider Number	Facility Name	Facility County	Home Patient	In-Center	County Total
		Chatham	0	45	45
34-2621	Carolina Dialysis Siler City	Chatham	0	22	22
34-2617	Carolina Dialysis Pittsboro	Orange	3	2	5
34-2622	Carolina Dialysis Carrboro	Lee	3	1	4
34-2620	Carolina Dialysis Sanford	Durham	0	1	1
34-2590	FMC Dialysis Services West Pettigrew	Durham	1	0	1
34-2616	Durham West Dialysis	Durham	0	1	1
34-2683	Southpoint Dialysis	Wake	0	1	1
34-2544	Cary Kidney Center	Guilford	0	1	1
34-2537	BMA of South Greensboro		7	74	81
		Chatham Totals			
Facilities serving residents of Cherokee County					
34-2649	Smokey Mountains Dialysis Center	Cherokee	0	19	19
34-2556	Sylva Dialysis Center	Jackson	1	1	2
34-2529	Dialysis Clinic - Shelby	Cleveland	0	2	2
34-2595	BMA Kings Mountain	Gaston	0	1	1
34-2611	Dialysis Clinic - Kings Mountain	Cleveland	0	1	1
		Cherokee Totals	1	24	25
Facilities serving residents of Chowan County					
34-2541	Edenton Dialysis	Chowan	0	32	32
34-2515	Elizabeth City Dialysis	Pasquotank	5	0	5
		Chowan Totals	5	32	37
Facilities serving residents of Clay County					
34-2649	Smokey Mountains Dialysis Center	Cherokee	0	5	5
34-2556	Sylva Dialysis Center	Jackson	1	0	1
		Clay Totals	1	5	6
Facilities serving residents of Cleveland County					
34-2529	Dialysis Clinic - Shelby	Cleveland	18	85	103
34-2611	Dialysis Clinic - Kings Mountain	Cleveland	0	43	43
34-2676	DCI South	Cleveland	0	37	37
34-2661	Dialysis Clinic, Inc	Cleveland	0	27	27
34-2595	BMA Kings Mountain	Gaston	0	16	16
34-2513	FMC Gastonia	Gaston	13	2	15
34-2566	Dialysis Care of Rutherford County	Rutherford	3	3	6
34-2306	Carolinas Medical Center	Mecklenburg	1	1	2
34-2516	FMC of Hickory	Catawba	1	1	2
34-2671	FMC South Gaston	Gaston	0	1	1
34-2591	DSI Glenwater Dialysis	Mecklenburg	0	1	1
		Cleveland Totals	36	217	253
Facilities serving residents of Columbus County					
34-2521	Southeastern Dialysis Center-Whiteville	Columbus	0	60	60
34-2628	Chadbourne Dialysis Center	Columbus	0	43	43
34-2578	Southeastern Dialysis Center - Elizabethtown	Bladen	9	1	10
34-2511	Southeastern Dialysis Center - Wilmington	New Hanover	2	4	6
34-2623	FMC Dialysis Services of Robeson County	Robeson	0	3	3
34-2582	Southeastern Dialysis Center - Shallotte	Brunswick	2	0	2
34-2685	Cape Fear Dialysis	New Hanover	0	2	2
34-2689	FMC Brunswick County	Brunswick	1	0	1

Provider Number	Facility Name	Facility County	Home Patient	In-Center	County Total
34-2528	Lumberton Dialysis Unit	Robeson	0	1	1
Columbus Totals			14	114	128
Facilities serving residents of Craven County					
34-2534	New Bern Dialysis	Craven	0	86	86
34-2585	FMC Craven County	Craven	18	59	77
34-2518	BMA Kinston	Lenoir	0	4	4
34-2502	Greenville Dialysis Center	Pitt	1	2	3
34-2532	Southeastern Dialysis Center- Jacksonville	Onslow	2	0	2
34-2596	FMC Dialysis Services East Carolina University	Pitt	1	0	1
34-2632	FMC Care of Ayden	Pitt	0	1	1
34-2625	FMC Dialysis Service of Jones County	Jones	0	1	1
34-2561	FMC Pamlico	Beaufort	0	1	1
Craven Totals			22	154	176
Facilities serving residents of Cumberland County					
34-2510	Fayetteville Kidney Center	Cumberland	55	138	193
34-2593	FMC Dialysis Services North Ramsey	Cumberland	0	139	139
34-2601	FMC Dialysis Services South Ramsey	Cumberland	0	130	130
34-2643	FMC Services of West Fayetteville	Cumberland	0	127	127
34-2662	FMC St. Pauls	Robeson	0	8	8
34-3504	Duke Hospital Dialysis	Durham	5	0	5
34-2651	St. Pauls Dialysis Center	Robeson	0	5	5
34-2622	Carolina Dialysis Carrboro	Orange	3	0	3
34-2555	Dialysis Care of Moore County	Moore	3	0	3
34-2557	Dunn Kidney Center	Harnett	2	0	2
34-2579	Dialysis Care of Hoke County	Hoke	0	2	2
34-2620	Carolina Dialysis Sanford	Lee	1	0	1
34-2688	FMC of Roseboro	Lee	0	1	1
34-2503	FMC Charlotte	Sampson	0	1	1
34-2648	Fresenius Medical Care of Lillington	Mecklenburg	0	1	1
Cumberland Totals			69	552	621
Facilities serving residents of Currituck County					
34-2515	Elizabeth City Dialysis	Pasquotank		3	5
34-2598	Dare County Dialysis Center	Dare		0	1
Currituck Totals				3	6
Facilities serving residents of Dare County					
34-2598	Dare County Dialysis Center	Dare		0	24
34-2515	Elizabeth City Dialysis	Pasquotank		4	0
Dare Totals				4	24
Facilities serving residents of Davidson County					
34-2553	Lexington Dialysis Center	Davidson		17	88
34-2639	Thomasville Dialysis Center	Davidson		0	62
34-2514	High Point Kidney Center	Guilford		10	0
34-2599	Triad Dialysis Center	Guilford		0	4
34-2505	Piedmont Dialysis Center	Forsyth		3	1
34-2546	Dialysis Care of Rowan County	Rowan		0	2
34-2524	BMA of Asheboro	Randolph		0	2
34-2504	BMA of Greensboro	Guilford		1	0
Davidson Totals				17	88
Guilford Totals				10	4
Forsyth Totals				3	1
Rowan Totals				0	2
Randolph Totals				0	2
Guilford Totals				1	0

Provider Number	Facility Name	Facility County	Home Patient	In-Center	County Total
		Forsyth	0	1	1
34-2612	Northside Dialysis Center	Guilford	0	1	1
34-2537	BMA of South Greensboro	Stanly	0	1	1
34-2565	BMA Albemarle	Guilford	0	1	1
34-2600	BMA of Southwest Greensboro		31	163	194
Davidson Totals					
Facilities serving residents of Davie County					
		Davie	0	29	29
34-2677	Davie Kidney Center	Forsyth	5	0	5
34-2505	Piedmont Dialysis Center	Iredell	2	1	3
34-2527	Statesville Dialysis Center	Rowan	2	0	2
34-2546	Dialysis Care of Rowan County	Yadkin	1	1	2
34-2665	Yadkin Dialysis Center	Forsyth	0	1	1
34-2667	Miller Street Dialysis Center		10	32	42
Davie Totals					
Facilities serving residents of Duplin County					
		Duplin	0	52	52
34-2659	Wallace Dialysis	Duplin	0	42	42
34-2535	Southeastern Dialysis Center - Kenansville	Duplin	1	22	23
34-2630	RAI-West College-Warsaw	Wayne	6	0	6
34-2531	Goldsboro Dialysis	New Hanover	6	0	6
34-2511	Southeastern Dialysis Center - Wilmington	Lenoir	1	3	4
34-2609	FMC Vernon Dialysis	Wayne	0	2	2
34-2573	Mt Olive Dialysis	Wayne	0	1	1
34-2550	Durham Dialysis	Durham	0	1	1
			14	122	136
Duplin Totals					
Facilities serving residents of Durham County					
		Durham	14	82	96
34-2616	Durham West Dialysis	Durham	0	86	86
34-2550	Durham Dialysis	Durham	0	74	74
34-2615	FMC Dialysis Services of Briggs Avenue	Durham	0	73	73
34-2538	Freedom Lake Dialysis Unit	Durham	16	51	67
34-2590	FMC Dialysis Services West Pettigrew	Durham	13	37	50
34-3504	Duke Hospital Diaylsis	Durham	0	37	37
34-2683	Southpoint Dialysis	Durham	0	36	36
34-2680	FMC South Durham Dialysis	Orange	6	15	21
34-2622	Carolina Dialysis Carrboro	Person	1	2	3
34-2562	Roxboro Dialysis	Wake	0	1	1
34-2544	Cary Kidney Center	Carteret	0	1	1
34-2588	Crystal Coast Dialysis Unit	Wake	0	1	1
34-2653	FMC Millbrook	Wake	0	1	1
34-2675	Wake Forest Dialysis Center	Wake	1	0	1
34-2646	FMC New Hope Dialysis		51	497	548
Durham Totals					
Facilities serving residents of Edgecombe County					
		Edgecombe	0	91	91
34-2603	BMA East Rocky Mount	Edgecombe	5	80	85
34-2577	Dialysis Care of Edgecombe County	Nash	14	29	43
34-2517	Rocky Mount Kidney Center	Pitt	0	3	3
34-2502	Greenville Dialysis Center	Pitt	1	1	2
34-2596	FMC Dialysis Services East Carolina University	Pitt	0	1	1
34-2637	Forest Hills Dialysis	Wilson	0	1	1

Provider Number	Facility Name	Facility County	Home Patient	In-Center	County Total
		Wake	1	0	1
34-2512	BMA of Raleigh Dialysis	Wilson	0	1	1
34-2507	Wilson Dialysis		21	206	227
Edgecombe Totals					
Facilities serving residents of Forsyth County					
34-2505	Piedmont Dialysis Center	Forsyth	88	136	224
34-2569	Salem Kidney Center	Forsyth	0	130	130
34-2612	Northside Dialysis Center	Forsyth	0	120	120
34-2667	Miller Street Dialysis Center	Forsyth	0	104	104
34-2599	Triad Dialysis Center	Guilford	0	6	6
34-2633	King Dialysis Center	Stokes	0	5	5
34-2553	Lexington Dialysis Center	Davidson	0	2	2
34-2533	BMA Burlington	Alamance	1	0	1
34-2504	BMA of Greensboro	Guilford	1	0	1
34-2514	High Point Kidney Center	Guilford	1	0	1
Forsyth Totals			91	503	594
Facilities serving residents of Franklin County					
34-2571	Dialysis Care of Franklin County	Franklin	7	64	71
34-2675	Wake Forest Dialysis Center	Wake	2	10	12
34-2672	FMC Eastern Wake	Wake	0	9	9
34-2589	Zebulon Kidney Center	Wake	0	7	7
34-2522	Wake Dialysis Clinic	Wake	0	3	3
34-2543	Vance County Dialysis	Wake	0	1	1
34-2520	FMC Dialysis Services Neuse River	Vance	1	1	2
34-2647	FMS Dialysis Services of Oxford	Granville	0	2	2
34-2646	FMC New Hope Dialysis	Granville	0	2	2
34-2644	FMC of Spring Hope	Wake	1	0	1
34-2622	Carolina Dialysis Carrboro	Wake	0	1	1
		Nash	0	1	1
		Orange	0	1	1
Franklin Totals			11	100	111
Facilities serving residents of Gaston County					
34-2513	FMC Gastonia	Gaston	21	111	132
34-2671	FMC South Gaston	Gaston	0	57	57
34-2652	FMC Belmont	Gaston	0	43	43
34-2595	BMA Kings Mountain	Gaston	0	16	16
34-2529	Dialysis Clinic - Shelby	Cleveland	0	8	8
34-2568	FMC Lincolnton	Lincoln	0	7	7
34-2548	Charlotte Dialysis	Mecklenburg	1	5	6
34-2611	Dialysis Clinic - Kings Mountain	Mecklenburg	0	4	4
34-2503	FMC Charlotte	Cleveland	0	4	4
34-2306	Carolinas Medical Center	Mecklenburg	2	0	2
34-2676	DCI South	Mecklenburg	1	0	1
34-2663	North Charlotte Dialysis Center	Mecklenburg	1	0	1
34-2591	DSI Glenwater Dialysis	Cleveland	0	1	1
		Mecklenburg	0	1	1
Gaston Totals			25	254	279
Facilities serving residents of Gates County					
34-2515	Elizabeth City Dialysis	Pasquotank	2	3	5
34-2570	Ahoskie Dialysis	Hertford	0	5	5
Gates Totals			2	8	10

Provider Number	Facility Name	Facility County	Home Patient	In-Center	County Total
Facilities serving residents of Georgia County					
34-2649	Smokey Mountains Dialysis Center	Cherokee	0	2	2
Georgia Totals			0	2	2
Facilities serving residents of Graham County					
34-2602	Cherokee Dialysis Center	Swain	0	12	12
34-2649	Smokey Mountains Dialysis Center	Cherokee	0	3	3
Graham Totals			0	15	15
Facilities serving residents of Granville County					
34-2520	FMC Dialysis Services Neuse River	Granville	5	54	59
34-2647	FMS Dialysis Services of Oxford	Granville	0	49	49
34-2543	Vance County Dialysis	Vance	2	19	21
34-2616	Durham West Dialysis	Durham	4	3	7
34-3504	Duke Hospital Dialysis	Durham	2	3	5
34-2622	Carolina Dialysis Carrboro	Durham	2	1	3
34-2590	FMC Dialysis Services West Pettigrew	Orange	1	1	2
34-2562	Roxboro Dialysis	Durham	0	2	2
34-2675	Wake Forest Dialysis Center	Person	0	1	1
34-2538	Freedom Lake Dialysis Unit	Wake	0	1	1
34-2680	FMC South Durham Dialysis	Durham	0	1	1
34-2550	Durham Dialysis	Durham	0	1	1
Granville Totals			16	136	152
Facilities serving residents of Greene County					
34-2650	Greene County Dialysis Center	Greene	0	48	48
34-2502	Greenville Dialysis Center	Pitt	3	2	5
34-2596	FMC Dialysis Services East Carolina University	Pitt	2	1	3
34-2609	FMC Vernon Dialysis	Lenoir	1	1	2
34-2531	Goldsboro Dialysis	Wayne	1	0	1
Greene Totals			7	52	59
Facilities serving residents of Guilford County					
34-2504	BMA of Greensboro	Guilford	26	150	176
34-2537	BMA of South Greensboro	Guilford	0	166	166
34-2599	Triad Dialysis Center	Guilford	0	160	160
34-2634	FMC of East Greensboro	Guilford	0	100	100
34-2600	BMA of Southwest Greensboro	Guilford	0	94	94
34-2613	Northwest Greensboro Kidney Center	Guilford	0	71	71
34-2514	High Point Kidney Center	Guilford	28	0	28
34-2533	BMA Burlington	Alamance	0	21	21
34-2639	Thomasville Dialysis Center	Davidson	0	9	9
34-2505	Piedmont Dialysis Center	Forsyth	7	0	7
34-2567	Burlington Dialysis	Alamance	0	6	6
34-2641	Rockingham Kidney Center	Rockingham	0	3	3
34-2691	FMC Mebane	Alamance	1	1	2
34-2686	North Burlington Dialysis	Alamance	1	1	2
34-2689	FMC Brunswick County	Brunswick	0	1	1
34-2612	Northside Dialysis Center	Forsyth	0	1	1
34-2667	Miller Street Dialysis Center	Forsyth	0	1	1
34-2624	Madison Dialysis Center	Rockingham	0	1	1

Provider Number	Facility Name	Facility County	Home Patient	In-Center	County Total
		Forsyth	0	1	1
34-2569	Salem Kidney Center	Randolph	0	1	1
34-2524	BMA of Asheboro		63	788	851
		Guilford Totals			
Facilities serving residents of Halifax County					
34-2542	BMA of Roanoke Rapids	Halifax	15	108	123
34-2619	FMC Dialysis Services of Halifax	Halifax	0	51	51
34-2517	Rocky Mount Kidney Center	Nash	4	22	26
34-2610	FMC Dialysis Services of Warren Hills	Warren	0	10	10
34-2603	BMA East Rocky Mount	Edgecombe	0	2	2
34-2562	Roxboro Dialysis	Person	0	2	2
34-2596	FMC Dialysis Services East Carolina University	Pitt	1	0	1
34-2589	Zebulon Kidney Center	Wake	0	1	1
34-2543	Vance County Dialysis	Vance	0	1	1
34-2577	Dialysis Care of Edgecombe County	Edgecombe	0	1	1
		Halifax Totals	20	198	218
Facilities serving residents of Harnett County					
34-2557	Dunn Kidney Center	Harnett	8	77	85
34-2648	Fresenius Medical Care of Lillington	Harnett	0	35	35
34-2620	Carolina Dialysis Sanford	Lee	2	22	24
34-2694	FMC Angier	Harnett	0	13	13
34-2608	BMA of Fuquay Varina Kidney Center	Wake	0	5	5
34-2593	FMC Dialysis Services North Ramsey	Cumberland	0	3	3
34-2512	BMA of Raleigh Dialysis	Wake	2	0	2
34-2679	Carthage Dialysis	Moore	0	1	1
34-2510	Fayetteville Kidney Center	Cumberland	1	0	1
34-2642	Southwest Wake County Dialysis	Wake	0	1	1
		Harnett Totals	13	157	170
Facilities serving residents of Haywood County					
34-2629	Waynesville Dialysis Center	Haywood	0	51	51
34-2506	Asheville Kidney Center	Buncombe	6	1	7
		Haywood Totals	6	52	58
Facilities serving residents of Henderson County					
34-2564	Hendersonville Dialysis Center	Henderson	0	59	59
34-2506	Asheville Kidney Center	Buncombe	20	0	20
34-2566	Dialysis Care of Rutherford County	Rutherford	1	0	1
34-2629	Waynesville Dialysis Center	Haywood	0	1	1
34-2505	Piedmont Dialysis Center	Forsyth	1	0	1
		Henderson Totals	22	60	82
Facilities serving residents of Hertford County					
34-2570	Ahoskie Dialysis	Hertford	0	64	64
34-2586	FMC East Northampton County	Northampton	0	5	5
34-2502	Greenville Dialysis Center	Pitt	4	0	4
34-2515	Elizabeth City Dialysis	Pasquotank	3	0	3
34-2584	Dialysis Care of Martin County	Martin	1	0	1
34-2588	Crystal Coast Dialysis Unit	Carteret	0	1	1
34-2542	BMA of Roanoke Rapids	Halifax	1	0	1
34-2547	Windsor Dialysis Unit	Bertie	0	1	1

Provider Number	Facility Name	Facility County	Home Patient	In-Center	County Total
Hertford Totals			9	71	80
Facilities serving residents of Hoke County					
34-2579	Dialysis Care of Hoke County	Hoke	0	92	92
34-2510	Fayetteville Kidney Center	Cumberland	5	2	7
34-2555	Dialysis Care of Moore County	Moore	3	2	5
34-2643	FMC Services of West Fayetteville	Cumberland	0	2	2
34-2638	Southern Pines Dialysis Center	Moore	0	1	1
34-2607	BMA of Red Springs	Robeson	0	1	1
34-2651	St. Pauls Dialysis Center	Robeson	0	1	1
Hoke Totals			8	101	109
Facilities serving residents of Hyde County					
34-2561	FMC Pamlico	Beaufort	3	3	6
34-2502	Greenville Dialysis Center	Pitt	1	0	1
34-2618	FMC Dialysis Services Plymouth	Washington	0	1	1
Hyde Totals			4	4	8
Facilities serving residents of Iredell County					
34-2527	Statesville Dialysis Center	Iredell	19	69	88
34-2606	Lake Norman Dialysis Center	Iredell	12	61	73
34-2636	West Iredell Dialysis Center	Iredell	0	41	41
34-2657	INS Statesville	Iredell	13	0	13
34-2656	INS Iredell County	Iredell	6	0	6
34-2677	Davie Kidney Center	Davie	0	2	2
34-2505	Piedmont Dialysis Center	Forsyth	2	0	2
34-2516	FMC of Hickory	Catawba	0	1	1
34-2546	Dialysis Care of Rowan County	Rowan	1	0	1
34-2306	Carolinas Medical Center	Mecklenburg	1	0	1
34-2686	North Burlington Dialysis	Alamance	1	0	1
Iredell Totals			55	174	229
Facilities serving residents of Jackson County					
34-2556	Sylva Dialysis Center	Jackson	8	22	30
34-2602	Cherokee Dialysis Center	Swain	0	1	1
34-2506	Asheville Kidney Center	Buncombe	1	0	1
Jackson Totals			9	23	32
Facilities serving residents of Johnston County					
34-2572	Johnston Dialysis Center	Johnston	0	81	81
34-2678	FMC Stallings Station	Johnston	13	49	62
34-2545	FMC Four Oaks	Johnston	0	56	56
34-2589	Zebulon Kidney Center	Wake	0	12	12
34-2522	Wake Dialysis Clinic	Wake	7	1	8
34-2557	Dunn Kidney Center	Harnett	2	4	6
34-2507	Wilson Dialysis	Wilson	3	2	5
34-2646	FMC New Hope Dialysis	Wake	4	1	5
34-2637	Forest Hills Dialysis	Wilson	0	5	5
34-2642	Southwest Wake County Dialysis	Wake	0	4	4
34-2694	FMC Angier	Wake	0	3	3
34-2531	Goldsboro Dialysis	Harnett	0	0	0
34-2608	BMA of Fuquay Varina Kidney Center	Wayne	2	0	2
		Wake	0	2	2

Provider Number	Facility Name	Facility County	Home Patient	In-Center	County Total
		Wake	0	1	1
34-2672	FMC Eastern Wake	Lee	1	0	1
34-2620	Carolina Dialysis Sanford	Wake	0	1	1
34-2675	Wake Forest Dialysis Center	Wake	1	0	1
34-2512	BMA of Raleigh Dialysis		33	222	255
Johnston Totals					
Facilities serving residents of Jones County					
		Jones	0	20	20
34-2625	FMC Dialysis Service of Jones County	Craven	2	1	3
34-2585	FMC Craven County	Pitt	1	0	1
34-2502	Greenville Dialysis Center	Onslow	0	1	1
34-2532	Southeastern Dialysis Center- Jacksonville		3	22	25
Jones Totals					
Facilities serving residents of Lee County					
		Lee	5	113	118
34-2620	Carolina Dialysis Sanford	Harnett	0	3	3
34-2648	Fresenius Medical Care of Lillington	Chatham	0	2	2
34-2617	Carolina Dialysis Pittsboro	Moore	2	0	2
34-2555	Dialysis Care of Moore County	Wake	0	2	2
34-2658	FMC Apex	Robeson	0	1	1
34-2662	FMC St. Pauls	Orange	1	0	1
34-2622	Carolina Dialysis Carrboro	Moore	0	1	1
34-2679	Carthage Dialysis	Wake	1	0	1
34-2646	FMC New Hope Dialysis		9	122	131
Lee Totals					
Facilities serving residents of Lenoir County					
		Lenoir	0	93	93
34-2518	BMA Kinston	Lenoir	9	64	73
34-2609	FMC Vernon Dialysis	Pitt	3	1	4
34-2596	FMC Dialysis Services East Carolina University	Wayne	0	4	4
34-2587	Goldsboro South Dialysis	Wayne	3	1	4
34-2531	Goldsboro Dialysis	Greene	0	3	3
34-2650	Greene County Dialysis Center	Pitt	3	0	3
34-2502	Greenville Dialysis Center	Duplin	0	3	3
34-2535	Southeastern Dialysis Center - Kenansville		18	169	187
Lenoir Totals					
Facilities serving residents of Lincoln County					
		Lincoln	0	66	66
34-2568	FMC Lincolnton	Catawba	9	6	15
34-2516	FMC of Hickory	Gaston	9	0	9
34-2513	FMC Gastonia	Iredell	2	3	5
34-2606	Lake Norman Dialysis Center	Cleveland	2	2	4
34-2529	Dialysis Clinic - Shelby	Mecklenburg	1	0	1
34-2306	Carolinas Medical Center	Iredell	1	0	1
34-2656	INS Iredell County		24	77	101
Lincoln Totals					
Facilities serving residents of Macon County					
		Jackson	5	20	25
34-2556	Sylva Dialysis Center	Buncombe	1	0	1
34-2506	Asheville Kidney Center		6	20	26
Macon Totals					
Facilities serving residents of Madison County					
		Buncombe	0	14	14
34-2604	Weaverville Dialysis				

Provider Number	Facility Name	Facility County	Home Patient	In-Center	County Total
34-2506	Asheville Kidney Center	Buncombe	2	0	2
34-2590	FMC Dialysis Services West Pettigrew	Durham	0	1	1
			2	15	17
Madison Totals					
Facilities serving residents of Martin County					
34-2584	Dialysis Care of Martin County	Martin	4	61	65
34-2596	FMC Dialysis Services East Carolina University	Pitt	3	4	7
34-2502	Greenville Dialysis Center	Pitt	2	3	5
34-2618	FMC Dialysis Services Plymouth	Washington	0	4	4
34-2561	FMC Pamlico	Beaufort	3	0	3
34-2507	Wilson Dialysis	Wilson	1	0	1
34-2577	Dialysis Care of Edgecombe County	Edgecombe	0	1	1
34-2547	Windsor Dialysis Unit	Bertie	0	1	1
			13	74	87
Martin Totals					
Facilities serving residents of McDowell County					
34-2645	McDowell Dialysis Center	McDowell	0	45	45
34-2506	Asheville Kidney Center	Buncombe	9	0	9
34-2563	BMA of Burke County	Burke	2	1	3
			11	46	57
McDowell Totals					
Facilities serving residents of Mecklenburg County					
34-2503	FMC Charlotte	Mecklenburg	55	123	178
34-2548	Charlotte Dialysis	Mecklenburg	47	112	159
34-2581	BMA Beatties Ford	Mecklenburg	0	119	119
34-2663	North Charlotte Dialysis Center	Mecklenburg	0	119	119
34-2591	DSI Glenwater Dialysis	Mecklenburg	10	107	117
34-2549	BMA of North Charlotte	Mecklenburg	0	117	117
34-2594	BMA Nations Ford	Mecklenburg	0	96	96
34-2554	BMA West Charlotte	Mecklenburg	0	82	82
34-2605	BMA of East Charlotte	Mecklenburg	0	82	82
34-2627	Charlotte East Dialysis	Mecklenburg	0	77	77
34-2681	FMC Matthews	Mecklenburg	0	75	75
34-2552	DSI Charlotte Latrobe Dialysis	Mecklenburg	10	60	70
34-2523	South Charlotte Dialysis	Mecklenburg	0	61	61
34-2606	Lake Norman Dialysis Center	Iredell	2	25	27
34-2692	Mint Hill Dialysis	Mecklenburg	0	22	22
34-2670	Harrisburg Dialysis Center	Mecklenburg	7	9	16
34-2655	INS Charlotte	Cabarrus	7	9	16
34-2513	FMC Gastonia	Mecklenburg	16	0	16
34-2654	INS Huntersville	Gaston	7	0	7
34-2526	Union County Dialysis	Mecklenburg	5	0	5
34-2306	Carolinas Medical Center	Union	0	5	5
34-2592	Dialysis Care of Kannapolis	Mecklenburg	1	3	4
34-2652	FMC Belmont	Mecklenburg	1	0	2
34-2671	FMC South Gaston	Rowan	2	0	2
34-3504	Duke Hospital Dialysis	Gaston	0	1	1
34-2553	Lexington Dialysis Center	Gaston	0	1	1
34-2527	Statesville Dialysis Center	Durham	1	0	1
34-2677	Davie Kidney Center	Davidson	0	1	1
		Iredell	1	0	1
		Davie	0	1	1

Provider Number	Facility Name	Facility County	Home Patient	In-Center	County Total
		Forsyth	1	0	1
34-2505	Piedmont Dialysis Center	Union	0	1	1
34-2525	Metrolina Kidney Center		165	1299	1464
Mecklenburg Totals					
Facilities serving residents of Mitchell County					
		Mitchell	0	7	7
34-2660	Mayland Dialysis Center		0	7	7
Mitchell Totals					
Facilities serving residents of Montgomery County					
		Montgomery	0	49	49
34-2583	Dialysis Care of Montgomery County	Stanly	0	9	9
34-2565	BMA Albemarle	Moore	3	1	4
34-2555	Dialysis Care of Moore County	Cabarrus	0	1	1
34-2670	Harrisburg Dialysis Center	Anson	0	1	1
34-2560	Dialysis Care of Anson County		3	61	64
Montgomery Totals					
Facilities serving residents of Moore County					
		Moore	22	67	89
34-2555	Dialysis Care of Moore County	Moore	0	47	47
34-2638	Southern Pines Dialysis Center	Moore	0	23	23
34-2679	Carthage Dialysis	Lee	4	1	5
34-2620	Carolina Dialysis Sanford	Montgomery	0	4	4
34-2583	Dialysis Care of Montgomery County	Hoke	0	1	1
34-2579	Dialysis Care of Hoke County		26	143	169
Moore Totals					
Facilities serving residents of Nash County					
		Nash	12	105	117
34-2517	Rocky Mount Kidney Center	Nash	0	32	32
34-2644	FMC of Spring Hope	Edgecombe	0	21	21
34-2603	BMA East Rocky Mount	Wilson	5	7	12
34-2507	Wilson Dialysis	Edgecombe	0	11	11
34-2577	Dialysis Care of Edgecombe County	Wilson	0	8	8
34-2637	Forest Hills Dialysis	Wake	2	0	2
34-2512	BMA of Raleigh Dialysis	Wake	0	1	1
34-2589	Zebulon Kidney Center	Pitt	1	0	1
34-2596	FMC Dialysis Services East Carolina University	Wake	0	1	1
34-2675	Wake Forest Dialysis Center	Durham	0	1	1
34-2683	Southpoint Dialysis	Pitt	1	0	1
34-2502	Greenville Dialysis Center		21	187	208
Nash Totals					
Facilities serving residents of New Hanover County					
		New Hanover	50	75	125
34-2511	Southeastern Dialysis Center - Wilmington	New Hanover	0	112	112
34-2685	Cape Fear Dialysis	Brunswick	2	0	2
34-2689	FMC Brunswick County	Orange	1	0	1
34-2622	Carolina Dialysis Carrboro		53	187	240
New Hanover Totals					
Facilities serving residents of Northampton County					
		Northampton	0	40	40
34-2586	FMC East Northampton County	Halifax	9	25	34
34-2542	BMA of Roanoke Rapids	Halifax	0	3	3
34-2619	FMC Dialysis Services of Halifax	Orange	2	0	2
34-2622	Carolina Dialysis Carrboro	Hertford	0	1	1
34-2570	Ahoskie Dialysis				

Provider Number	Facility Name	Facility County	Home Patient	In-Center	County Total
		Pitt	1	0	1
34-2502	Greenville Dialysis Center	Nash	1	0	1
34-2517	Rocky Mount Kidney Center		13	69	82
Northampton Totals					
Facilities serving residents of Onslow County					
34-2532	Southeastern Dialysis Center- Jacksonville	Onslow	24	136	160
34-2585	FMC Craven County	Craven	5	0	5
34-2596	FMC Dialysis Services East Carolina University	Pitt	1	0	1
34-2588	Crystal Coast Dialysis Unit	Carteret	0	1	1
34-2507	Wilson Dialysis	Wilson	1	0	1
Onslow Totals			31	137	168
Facilities serving residents of Orange County					
34-2622	Carolina Dialysis Carrboro	Orange	9	82	91
34-2616	Durham West Dialysis	Durham	1	9	10
34-2691	FMC Mebane	Alamance	1	5	6
34-3504	Duke Hospital Diaylsis	Durham	2	3	5
34-2590	FMC Dialysis Services West Pettigrew	Durham	2	3	5
34-2550	Durham Dialysis	Durham	0	2	2
34-2562	Roxboro Dialysis	Person	0	2	2
34-2680	FMC South Durham Dialysis	Durham	0	2	2
34-2512	BMA of Raleigh Dialysis	Wake	1	0	1
34-2588	Crystal Coast Dialysis Unit	Carteret	0	1	1
34-2567	Burlington Dialysis	Alamance	0	1	1
34-2617	Carolina Dialysis Pittsboro	Chatham	0	1	1
34-2533	BMA Burlington	Alamance	0	1	1
Orange Totals			16	112	128
Facilities serving residents of Other States County					
34-2590	FMC Dialysis Services West Pettigrew	Durham	0	8	8
34-2306	Carolinas Medical Center	Mecklenburg	1	3	4
34-2588	Crystal Coast Dialysis Unit	Carteret	0	3	3
34-2503	FMC Charlotte	Mecklenburg	1	2	3
34-2550	Durham Dialysis	Durham	0	2	2
34-2681	FMC Matthews	Mecklenburg	0	2	2
34-2598	Dare County Dialysis Center	Dare	0	1	1
34-2502	Greenville Dialysis Center	Pitt	0	1	1
34-2534	New Bern Dialysis	Craven	0	1	1
34-2632	FMC Care of Ayden	Pitt	0	1	1
34-2513	FMC Gastonia	Gaston	0	1	1
34-2581	BMA Beatties Ford	Mecklenburg	0	1	1
34-2549	BMA of North Charlotte	Mecklenburg	0	1	1
34-2620	Carolina Dialysis Sanford	Lee	0	1	1
Other States Totals			2	28	30
Facilities serving residents of Pamlico County					
34-2585	FMC Craven County	Craven	2	8	10
34-2534	New Bern Dialysis	Craven	0	5	5
34-2502	Greenville Dialysis Center	Pitt	2	0	2
Pamlico Totals			4	13	17
Facilities serving residents of Pasquotank County					

Provider Number	Facility Name	Facility County	Home Patient	In-Center	County Total
		Pasquotank	13	80	93
34-2515	Elizabeth City Dialysis	Chowan	0	4	4
34-2541	Edenton Dialysis	Hertford	0	1	1
34-2570	Ahoskie Dialysis		13	85	98
Pasquotank Totals					
Facilities serving residents of Pender County					
		Pender	0	66	66
34-2558	Southeastern Dialysis Center - Burgaw	New Hanover	10	0	10
34-2511	Southeastern Dialysis Center - Wilmington	New Hanover	0	9	9
34-2685	Cape Fear Dialysis	Onslow	0	1	1
34-2532	Southeastern Dialysis Center- Jacksonville	Duplin	0	1	1
34-2535	Southeastern Dialysis Center - Kenansville		10	77	87
Pender Totals					
Facilities serving residents of Perquimans County					
		Pasquotank	3	13	16
34-2515	Elizabeth City Dialysis	Chowan	0	15	15
34-2541	Edenton Dialysis		3	28	31
Perquimans Totals					
Facilities serving residents of Person County					
		Person	10	88	98
34-2562	Roxboro Dialysis	Durham	1	2	3
34-2590	FMC Dialysis Services West Pettigrew	Durham	0	2	2
34-2538	Freedom Lake Dialysis Unit	Durham	1	0	1
34-2616	Durham West Dialysis	Durham	0	1	1
34-3504	Duke Hospital Dialysis		12	93	105
Person Totals					
Facilities serving residents of Pitt County					
		Pitt	28	117	145
34-2502	Greenville Dialysis Center	Pitt	14	124	138
34-2596	FMC Dialysis Services East Carolina University	Pitt	0	50	50
34-2632	FMC Care of Ayden	Lenoir	0	6	6
34-2518	BMA Kinston	Beaufort	2	4	6
34-2561	FMC Pamlico	Wilson	0	1	1
34-2637	Forest Hills Dialysis	Greene	0	1	1
34-2650	Greene County Dialysis Center		44	303	347
Pitt Totals					
Facilities serving residents of Polk County					
		Buncombe	4	0	4
34-2506	Asheville Kidney Center	Rutherford	0	3	3
34-2566	Dialysis Care of Rutherford County	Henderson	0	2	2
34-2564	Hendersonville Dialysis Center		4	5	9
Polk Totals					
Facilities serving residents of Randolph County					
		Randolph	0	104	104
34-2524	BMA of Asheboro	Davidson	0	33	33
34-2639	Thomasville Dialysis Center	Chatham	0	9	9
34-2621	Carolina Dialysis Siler City	Guilford	7	0	7
34-2514	High Point Kidney Center	Guilford	6	1	7
34-2504	BMA of Greensboro	Guilford	0	4	4
34-2600	BMA of Southwest Greensboro	Davidson	2	2	4
34-2553	Lexington Dialysis Center	Guilford	0	3	3
34-2537	BMA of South Greensboro	Guilford	0	3	3
34-2599	Triad Dialysis Center	Alamance	0	1	1
34-2567	Burlington Dialysis				

Provider Number	Facility Name	Facility County	Home Patient	In-Center	County Total
		Moore	1	0	1
34-2555	Dialysis Care of Moore County	Alamance	0	1	1
34-2533	BMA Burlington		16	161	177
Randolph Totals					
Facilities serving residents of Richmond County					
34-2539	Dialysis Care of Richmond County	Richmond	5	79	84
34-2690	Sandhills Dialysis	Richmond	0	30	30
34-2555	Dialysis Care of Moore County	Moore	6	2	8
34-2583	Dialysis Care of Montgomery County	Montgomery	0	2	2
34-2540	BMA of Laurinburg	Scotland	1	0	1
34-2683	Southpoint Dialysis	Durham	0	1	1
34-2638	Southern Pines Dialysis Center	Moore	0	1	1
Richmond Totals					
Facilities serving residents of Robeson County					
34-2528	Lumberton Dialysis Unit	Robeson	18	99	117
34-2623	FMC Dialysis Services of Robeson County	Robeson	0	63	63
34-2682	FMC Pembroke	Robeson	0	49	49
34-2607	BMA of Red Springs	Robeson	0	39	39
34-2662	FMC St. Pauls	Robeson	0	33	33
34-2540	BMA of Laurinburg	Robeson	2	22	24
34-2651	St. Pauls Dialysis Center	Scotland	0	9	9
34-2579	Dialysis Care of Hoke County	Hoke	0	8	8
34-2555	Dialysis Care of Moore County	Moore	3	3	6
34-2539	Dialysis Care of Richmond County	Richmond	2	0	2
34-2664	FMC Scotland County	Scotland	0	1	1
34-2510	Fayetteville Kidney Center	Scotland	0	1	1
34-3504	Duke Hospital Dialysis	Cumberland	1	0	1
		Durham	1	0	1
Robeson Totals					
Facilities serving residents of Rockingham County					
34-2640	Reidsville Dialysis	Rockingham	0	69	69
34-2536	Dialysis Care of Rockingham County	Rockingham	6	52	58
34-2641	Rockingham Kidney Center	Rockingham	0	44	44
34-2624	Madison Dialysis Center	Rockingham	0	9	9
34-2613	Northwest Greensboro Kidney Center	Rockingham	0	9	9
34-2504	BMA of Greensboro	Guilford	0	0	0
34-2567	Burlington Dialysis	Guilford	2	0	2
34-2599	Triad Dialysis Center	Guilford	0	2	2
34-2533	BMA Burlington	Alamance	0	1	1
34-2537	BMA of South Greensboro	Guilford	0	1	1
34-2597	Renal Care Group - Caswell	Guilford	1	0	1
		Alamance	0	1	1
		Guilford	0	1	1
		Caswell	0	1	1
Rockingham Totals					
Facilities serving residents of Rowan County					
34-2546	Dialysis Care of Rowan County	Rowan	29	83	112
34-2592	Dialysis Care of Kannapolis	Rowan	14	29	43
34-2527	Statesville Dialysis Center	Iredell	4	2	6
34-2553	Lexington Dialysis Center	Davidson	1	3	4
34-2306	Carolinas Medical Center	Mecklenburg	0	2	2
34-2565	BMA Albemarle	Stanly	0	1	1

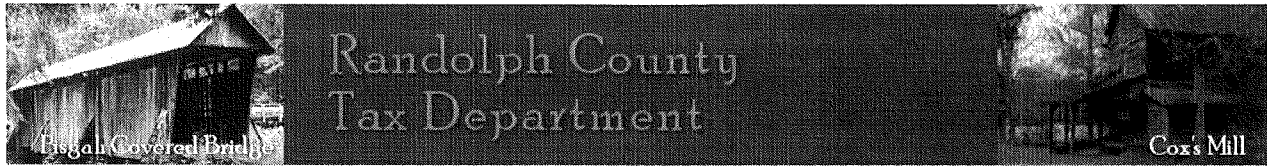
Provider Number	Facility Name	Facility County	Home Patient	In-Center	County Total
		Forsyth	1	0	1
34-2505	Piedmont Dialysis Center	Guilford	1	0	1
34-2504	BMA of Greensboro	Mecklenburg	0	1	1
34-2591	DSI Glenwater Dialysis	Iredell	1	0	1
34-2657	INS Statesville	Iredell	1	0	1
34-2606	Lake Norman Dialysis Center		52	121	173
Rowan Totals					
Facilities serving residents of Rutherford County					
		Rutherford	23	78	101
34-2566	Dialysis Care of Rutherford County	Cleveland	0	10	10
34-2661	Dialysis Clinic, Inc	Buncombe	2	1	3
34-2506	Asheville Kidney Center	Cleveland	2	0	2
34-2529	Dialysis Clinic - Shelby	McDowell	0	1	1
34-2645	McDowell Dialysis Center	Mecklenburg	1	0	1
34-2503	FMC Charlotte		28	90	118
Rutherford Totals					
Facilities serving residents of Sampson County					
		Sampson	0	95	95
34-2559	BMA of Clinton	Sampson	3	32	35
34-2688	FMC of Roseboro	Harnett	1	11	12
34-2557	Dunn Kidney Center	Wayne	9	1	10
34-2531	Goldsboro Dialysis	Wayne	0	7	7
34-2573	Mt Olive Dialysis	Duplin	3	1	4
34-2630	RAI-West College-Warsaw	Duplin	0	2	2
34-2535	Southeastern Dialysis Center - Kenansville	Bladen	1	1	2
34-2578	Southeastern Dialysis Center - Elizabethtown	Cumberland	0	1	1
34-2643	FMC Services of West Fayetteville	Cumberland	1	0	1
34-2510	Fayetteville Kidney Center	Orange	1	0	1
34-2622	Carolina Dialysis Carrboro	New Hanover	1	0	1
34-2511	Southeastern Dialysis Center - Wilmington		20	151	171
Sampson Totals					
Facilities serving residents of Scotland County					
		Scotland	6	56	62
34-2540	BMA of Laurinburg	Scotland	0	36	36
34-2664	FMC Scotland County	Richmond	2	6	8
34-2539	Dialysis Care of Richmond County	Hoke	0	7	7
34-2579	Dialysis Care of Hoke County	Moore	0	1	1
34-2638	Southern Pines Dialysis Center	Moore	1	0	1
34-2555	Dialysis Care of Moore County	Orange	1	0	1
34-2622	Carolina Dialysis Carrboro		10	106	116
Scotland Totals					
Facilities serving residents of South Carolina County					
		Scotland	0	9	9
34-2540	BMA of Laurinburg	Richmond	1	6	7
34-2539	Dialysis Care of Richmond County	Mecklenburg	7	0	7
34-2548	Charlotte Dialysis	Mecklenburg	0	6	6
34-2594	BMA Nations Ford	Union	1	4	5
34-2526	Union County Dialysis	Mecklenburg	3	1	4
34-2503	FMC Charlotte	Gaston	2	1	3
34-2513	FMC Gastonia	Gaston	0	3	3
34-2671	FMC South Gaston	Buncombe	2	0	2
34-2506	Asheville Kidney Center				

Provider Number	Facility Name	Facility County	Home Patient	In-Center	County Total
		Union	0	2	2
34-2525	Metrolina Kidney Center	Mecklenburg	0	1	1
34-2681	FMC Matthews	Anson	0	1	1
34-2673	FMC Anson County	Gaston	0	1	1
34-2595	BMA Kings Mountain	Mecklenburg	1	0	1
34-2552	DSI Charlotte Latrobe Dialysis	New Hanover	1	0	1
34-2511	Southeastern Dialysis Center - Wilmington		18	35	53
South Carolina Totals					
Facilities serving residents of Stanly County					
		Stanly	0	61	61
34-2565	BMA Albemarle	Rowan	3	0	3
34-2592	Dialysis Care of Kannapolis	Mecklenburg	1	1	2
34-2503	FMC Charlotte	Anson	0	1	1
34-2560	Dialysis Care of Anson County	Mecklenburg	0	1	1
34-2554	BMA West Charlotte		4	64	68
Stanly Totals					
Facilities serving residents of Stokes County					
		Stokes	0	36	36
34-2633	King Dialysis Center	Forsyth	7	1	8
34-2505	Piedmont Dialysis Center	Forsyth	0	5	5
34-2612	Northside Dialysis Center	Surry	1	1	2
34-2551	Mt Airy Dialysis Center		8	43	51
Stokes Totals					
Facilities serving residents of Surry County					
		Surry	6	64	70
34-2551	Mt Airy Dialysis Center	Surry	0	18	18
34-2614	Elkin Dialysis Center	Yadkin	3	0	3
34-2665	Yadkin Dialysis Center	Stokes	0	1	1
34-2633	King Dialysis Center	Forsyth	1	0	1
34-2505	Piedmont Dialysis Center		10	83	93
Surry Totals					
Facilities serving residents of Swain County					
		Swain	0	42	42
34-2602	Cherokee Dialysis Center	Jackson	10	1	11
34-2556	Sylva Dialysis Center		10	43	53
Swain Totals					
Facilities serving residents of Tennessee County					
		Watauga	1	2	3
34-2674	FMC Watauga County	Cherokee	0	1	1
34-2649	Smokey Mountains Dialysis Center		1	3	4
Tennessee Totals					
Facilities serving residents of Transylvania County					
		Henderson	0	19	19
34-2564	Hendersonville Dialysis Center	Buncombe	11	0	11
34-2506	Asheville Kidney Center		11	19	30
Transylvania Totals					
Facilities serving residents of Tyrrell County					
		Pasquotank	2	0	2
34-2515	Elizabeth City Dialysis	Chowan	0	2	2
34-2541	Edenton Dialysis	Washington	0	1	1
34-2618	FMC Dialysis Services Plymouth		2	3	5
Tyrrell Totals					
Facilities serving residents of Union County					
		Union	16	80	96
34-2526	Union County Dialysis	Union	0	52	52
34-2525	Metrolina Kidney Center				

Provider Number	Facility Name	Facility County	Home Patient	In-Center	County Total
		Union	0	17	17
34-2666	Marshville Dialysis Center	Mecklenburg	0	11	11
34-2681	FMC Matthews	Mecklenburg	0	10	10
34-2692	Mint Hill Dialysis	Mecklenburg	6	2	8
34-2548	Charlotte Dialysis	Mecklenburg	5	1	6
34-2503	FMC Charlotte	Mecklenburg	0	2	2
34-2591	DSI Glenwater Dialysis	Mecklenburg	0	2	2
34-2306	Carolinas Medical Center	Mecklenburg	0	2	2
34-2523	South Charlotte Dialysis	Mecklenburg	0	1	1
34-2605	BMA of East Charlotte	Mecklenburg	0	1	1
Union Totals			27	180	207
Facilities serving residents of Vance County					
		Vance	8	121	129
34-2543	Vance County Dialysis	Granville	1	19	20
34-2520	FMC Dialysis Services Neuse River	Granville	0	14	14
34-2647	FMS Dialysis Services of Oxford	Franklin	1	2	3
34-2571	Dialysis Care of Franklin County	Durham	2	0	2
34-2616	Durham West Dialysis	Orange	1	0	1
34-2622	Carolina Dialysis Carrboro	Wake	1	0	1
34-2646	FMC New Hope Dialysis	Wake	0	1	1
34-2589	Zebulon Kidney Center	Warren	0	1	1
34-2610	FMC Dialysis Services of Warren Hills	Durham	0	1	1
34-2550	Durham Dialysis	Wake	0	1	1
34-2512	BMA of Raleigh Dialysis	Wake	0	1	1
Vance Totals			14	160	174
Facilities serving residents of Virginia County					
		Rockingham	1	19	20
34-2536	Dialysis Care of Rockingham County	Surry	3	8	11
34-2551	Mt Airy Dialysis Center	Caswell	0	5	5
34-2597	Renal Care Group - Caswell	Dare	0	2	2
34-2598	Dare County Dialysis Center	Forsyth	2	0	2
34-2505	Piedmont Dialysis Center	Granville	1	1	2
34-2520	FMC Dialysis Services Neuse River	Warren	0	2	2
34-2610	FMC Dialysis Services of Warren Hills	Rockingham	0	1	1
34-2641	Rockingham Kidney Center	Beaufort	0	1	1
34-2561	FMC Pamlico	Northampton	0	1	1
34-2586	FMC East Northampton County	Hertford	0	1	1
34-2570	Ahoskie Dialysis	Halifax	0	1	1
34-2542	BMA of Roanoke Rapids	Durham	1	0	1
34-2590	FMC Dialysis Services West Pettigrew	Durham	1	0	1
Virginia Totals			8	42	50
Facilities serving residents of Wake County					
		Wake	37	179	216
34-2522	Wake Dialysis Clinic	Wake	56	156	212
34-2512	BMA of Raleigh Dialysis	Wake	0	113	113
34-2642	Southwest Wake County Dialysis	Wake	16	87	103
34-2646	FMC New Hope Dialysis	Wake	0	70	70
34-2544	Cary Kidney Center	Wake	0	69	69
34-2589	Zebulon Kidney Center	Wake	0	57	57
34-2653	FMC Millbrook	Wake	0	55	55
34-2608	BMA of Fuquay Varina Kidney Center	Wake	0	55	55

Provider Number	Facility Name	Facility County	Home Patient	In-Center	County Total
		Wake	0	52	52
34-2658	FMC Apex	Wake	11	38	49
34-2675	Wake Forest Dialysis Center	Wake	0	43	43
34-2672	FMC Eastern Wake	Wake	0	35	35
34-2684	FMC Central Raleigh	Wake	6	2	8
34-2622	Carolina Dialysis Carrboro	Orange	0	7	7
34-2683	Southpoint Dialysis	Durham	4	3	7
34-3504	Duke Hospital Dialysis	Durham	3	0	3
34-2616	Durham West Dialysis	Durham	0	3	3
34-2678	FMC Stallings Station	Johnston	0	3	3
34-2694	FMC Angier	Harnett	0	3	3
34-2590	FMC Dialysis Services West Pettigrew	Durham	3	0	3
34-2588	Crystal Coast Dialysis Unit	Carteret	0	1	1
34-2571	Dialysis Care of Franklin County	Franklin	1	0	1
34-2533	BMA Burlington	Franklin	0	1	1
34-2680	FMC South Durham Dialysis	Alamance	0	1	1
		Durham	0	1	1
		Wake Totals	137	975	1112
Facilities serving residents of Warren County					
34-2610	FMC Dialysis Services of Warren Hills	Warren	0	45	45
34-2543	Vance County Dialysis	Vance	4	9	13
34-2542	BMA of Roanoke Rapids	Halifax	2	2	4
34-2571	Dialysis Care of Franklin County	Franklin	1	1	2
34-2520	FMC Dialysis Services Neuse River	Franklin	1	1	2
34-2616	Durham West Dialysis	Granville	1	0	1
34-2517	Rocky Mount Kidney Center	Durham	1	0	1
		Nash	0	1	1
		Warren Totals	9	59	68
Facilities serving residents of Washington County					
34-2618	FMC Dialysis Services Plymouth	Washington	0	33	33
34-2561	FMC Pamlico	Beaufort	1	0	1
34-2541	Edenton Dialysis	Chowan	0	1	1
34-2502	Greenville Dialysis Center	Pitt	1	0	1
		Washington Totals	2	34	36
Facilities serving residents of Watauga County					
34-2674	FMC Watauga County	Watauga	7	20	27
34-2509	BMA Lenoir	Caldwell	1	0	1
		Watauga Totals	8	20	28
Facilities serving residents of Wayne County					
34-2531	Goldsboro Dialysis	Wayne	29	91	120
34-2587	Goldsboro South Dialysis	Wayne	0	72	72
34-2573	Mt Olive Dialysis	Wayne	0	33	33
34-2576	RAI Care Centers - Goldsboro	Wayne	0	22	22
34-2507	Wilson Dialysis	Wayne	4	1	5
34-2518	BMA Kinston	Wilson	0	2	2
34-2609	FMC Vernon Dialysis	Lenoir	1	1	2
34-2502	Greenville Dialysis Center	Lenoir	1	1	2
34-2678	FMC Stallings Station	Pitt	1	1	2
34-2596	FMC Dialysis Services East Carolina University	Pitt	0	1	1
34-2650	Greene County Dialysis Center	Johnston	0	1	1
		Pitt	1	0	1
		Greene	0	1	1

Provider Number	Facility Name	Facility County	Home Patient	In-Center	County Total
34-2622	Carolina Dialysis Carrboro	Orange	1	0	1
34-2637	Forest Hills Dialysis	Wilson	0	1	1
Wayne Totals			37	226	263
Facilities serving residents of Wilkes County					
34-2313	Wilkes Regional Dialysis Center	Wilkes	0	59	59
34-2614	Elkin Dialysis Center	Surry	0	13	13
34-2665	Yadkin Dialysis Center	Yadkin	11	1	12
34-2551	Mt Airy Dialysis Center	Surry	2	0	2
34-2657	INS Statesville	Iredell	2	0	2
34-2674	FMC Watauga County	Watauga	0	2	2
34-2509	BMA Lenoir	Caldwell	0	1	1
34-2687	FMC of Alexander County	Alexander	1	0	1
34-2505	Piedmont Dialysis Center	Forsyth	1	0	1
Wilkes Totals			17	76	93
Facilities serving residents of Wilson County					
34-2507	Wilson Dialysis	Wilson	23	121	144
34-2637	Forest Hills Dialysis	Wilson	0	82	82
34-2502	Greenville Dialysis Center	Pitt	4	1	5
34-2596	FMC Dialysis Services East Carolina University	Pitt	3	2	5
34-2589	Zebulon Kidney Center	Wake	0	2	2
34-2512	BMA of Raleigh Dialysis	Wake	1	0	1
34-2587	Goldsboro South Dialysis	Wayne	0	1	1
34-2517	Rocky Mount Kidney Center	Nash	1	0	1
34-2591	DSI Glenwater Dialysis	Mecklenburg	1	0	1
34-2622	Carolina Dialysis Carrboro	Orange	1	0	1
Wilson Totals			34	209	243
Facilities serving residents of Yadkin County					
34-2665	Yadkin Dialysis Center	Yadkin	8	23	31
34-2614	Elkin Dialysis Center	Surry	0	6	6
34-2657	INS Statesville	Iredell	2	0	2
34-2505	Piedmont Dialysis Center	Forsyth	2	0	2
34-2633	King Dialysis Center	Stokes	0	1	1
Yadkin Totals			12	30	42
Facilities serving residents of Yancey County					
34-2660	Mayland Dialysis Center	Mitchell	0	13	13
34-2604	Weaverville Dialysis	Buncombe	0	2	2
34-2506	Asheville Kidney Center	Buncombe	1	0	1
Yancey Totals			1	15	16

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Code	Description	Rate
	RANDOLPH COUNTY	0.61

School Rates

Code	Description	Rate
01	ASHEBORO	0.1385
02	TRINITY	0.09

City Rates

Code	Description	Rate
01	ASHEBORO	0.55
02	ARCHDALE	0.29
03	FRANKLINVILLE	0.42
04	LIBERTY	0.5125
05	RAMSEUR	0.61
06	RANDLEMAN	0.58
07	SEAGROVE	0.40
08	STALEY	0.125
09	HIGH POINT	0.675
10	THOMASVILLE	0.56
11	TRINITY	0.10

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Code	Description	Rate
01	FAIRGROVE	0.08
02	GUIL-RAND	0.12
03	CLIMAX	0.12
04	JULIAN	0.10
05	WESTSIDE	0.10
06	EASTSIDE	0.09
07	LEVEL CROSS	0.11
08	ULAH	0.061
09	SEAGROVE	0.10
10	STALEY	0.10
11	RANDLEMAN	0.10
12	TABERNACLE	0.10
13	NORTHEAST (LIBERTY)	0.09
14	SOPHIA	0.10

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CMS retains 12% cut in drug payments for ESRD care, approves new QIP measures

By [Mark E. Neumann](#)

November 25, 2013

[No Comments](#)

KEYWORDS [ESRD bundle](#) [Email](#) / [Print](#) / [Reprints](#) / | / [Text Size+](#)
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The Centers for Medicare and Medicaid Services issued its much-anticipated **final rule** Nov. 22 that updates 2014 payment rates for dialysis facilities paid under the end-stage renal disease Prospective Payment System (PPS). The agency also approved final changes to the ESRD Quality Incentive Program for performance year 2014, which will impact dialysis clinic payments in 2016.

Despite more than 1,000 comments protesting the proposed cut by the dialysis industry, patients, renal association groups, and even members of Congress, the agency decided to keep a 12% reduction in the drug utilization adjustment to the base rate, but implement it over a three- to four-year transition period.

(Where Medicare and the ESRD Program are headed)

CMS released a proposed rule in July that called for a 12% reduction in payments for injectable drugs based on a 30%+ drop in utilization—primarily in the prescribing of anemia drugs—from 2007 to 2012. The agency proposed to temper the cut with a 2.6% payment increase for 2014 based on the annual Medicare market basket review of costs of providing care to dialysis patients.

Congress required CMS to implement a payment reduction as part of the American Taxpayer Relief Act passed by Congress in 2012, but Congress left it up to the agency to determine the amount of the cut.

CMS said it would implement the first portion of the cut in 2014—a 3.3% reduction to the drug payment adjustment—but dialysis clinics won't see a change in the overall payment for patients for 2014 and 2015 because of other offsets, the agency said.

The cuts will still have an impact on the bottom line for dialysis clinics, said Kidney Care Council and Kidney Care Partners in prepared statements released on Friday in response to the final rule. "Today's Medicare ruling substantially reduces funding needed for patient care and interferes with the ability of our physicians, nurses, and clinical teams to do the very best for their patients," said KCC chairman Tom Weinberg. Ultimately, the payment cut of \$29.93 per dialysis treatment "contradicts the unified voice of patients, clinicians, providers, facilities, and members of Congress to correct the total amount of the reduction" originally proposed in July, said Weinberg. "Phasing in a cut of this magnitude only delays the harm."

(Mineral and bone disease testing attestation in the ESRD QIP: A tale of two cities)

According to Kidney Care Partners, a coalition of patients, physicians, nurses, providers, and manufacturers, the rule deals a “significant blow to an already fragile system” by ultimately reducing Medicare payments to a level that will not cover the cost of care for individuals on dialysis. “Phasing in this cut does not solve the problem,” said KCP chairman Ron Kuerbitz. “Instead, it only delays the inevitable harm that will come as a result of failing to cover the cost of care. Simply put, this model is unsustainable.”

As a result of the rule, KCP said, providers and physicians will face difficult choices regarding staffing, facility hours, quality improvement interventions, and ultimately whether an entire facility can be kept open to service a community. In turn, Medicare beneficiaries could face reduced access to care.

“Our community worked with Congress to establish a sustainable bundled payment system,” said Kuerbitz. “It is troubling that, as we celebrate the 40th anniversary of the Medicare dialysis benefit, this rule appears to be a step backwards. We appreciate those in Congress on both sides of the aisle who support their constituents living with kidney failure, and we will continue to work with them to ensure that these, and all Americans with kidney failure, have access to the highest quality care in the years to come.”

Details of the final rule include:

The ESRD payment base rate: This remains the same from CY 2013 to CY 2014 at \$239.02. CMS said the rate reflects the CY 2013 ESRD PPS base rate of \$240.36 adjusted by the ESRD market basket (3.2%) minus the productivity (0.4%) increase, the wage index budget neutrality factor of 1.000454, and the home dialysis training add-on budget neutrality adjustment factor of 0.999912. That brings the base rate up to \$247.18, but then CMS makes a 3.3% cut in the portion of the CY 2014 drug utilization adjustment that is being transitioned for 2014, or \$8.16, to arrive at a final CY 2014 ESRD PPS base rate of \$239.02 ($\$247.18 - \$8.16 = \239.02).

The wage index: No changes

The outlier policy: Outlier services fixed dollar loss amounts are updated for 2014 for adult and pediatric patients, along with Medicare Allowable Payments (MAPs) for adult patients for CY 2014 using 2012 claims data. Based on the use of more current data, the fixed-dollar loss amount for pediatric beneficiaries would increase from \$47.32 to \$54.01 and the adjusted average outlier services MAP amount would decrease from \$41.39 to \$40.49 as compared to CY 2013 values. For adult beneficiaries, the fixed-dollar loss amount would decrease from \$110.22 to \$98.67 and the adjusted average outlier services MAP amount would decrease from \$59.42 to \$50.25. The 1% target for outlier payments was not achieved in CY 2012. “We believe using CY 2012 claims data to update the outlier MAP and fixed dollar loss amounts for CY 2014 will increase payments for ESRD beneficiaries requiring higher resource utilization in accordance with a 1% outlier policy,” CMS said in the final rule.

The self-dialysis and home dialysis training add-on adjustment: Medicare is increasing this add-on adjustment by 50% for both peritoneal dialysis and home hemodialysis training treatments. In CY 2014, the nursing time accounted for in the training add-on adjustment will increase from one hour to 1.5 hours per training treatment, resulting in an increase of \$16.72, for a total training add-on adjustment of \$50.16 per training treatment.

The 50% increase in payment, however, is one of the offsets the agency is using to keep the 2014 base rate the same as 2013. “We note that the increase to the training add-on adjustment will be made in a budget neutral manner in that we have applied a training add-on budget-neutrality adjustment factor of 0.999912 to the base rate.”

The final rule also ends the four-year transition period for dialysis clinics that chose not to move directly into the new bundled payment system when it took effect in January 2011. Dialysis facilities were paid a blended payment with a portion of payments based on the composite rate methodology and a portion based on the new

PPS rate. In 2014, the final year of the four-year transition period, all dialysis facilities will be paid 100% of the ESRD PPS rate for dialysis services.

(SDO perspective on the bundle cuts: Dialysis patients face fewer options)

QIP measures finalized

The final rule also includes new reporting and clinical measures as part of the ESRD Quality Incentive Program. For the ESRD QIP Payment Year (PY) 2016 program (which will rely on measures of dialysis facility performance during 2014), CMS is finalizing 11 measures addressing infections, anemia management, dialysis adequacy, vascular access, mineral metabolism management, and patient experience of care. Performance scores will be calculated by weighting clinical measures at 75% of the total performance score and weighting the reporting measures at 25%.

More details on Provider Call

On Jan. 15, CMS will hold a National Provider Call to help facilities and other stakeholders in the ESRD community understand the final rule. The discussion will be recorded and made available at www.cms.gov/live.

Download the final rule.

Find more articles about the ESRD bundle

Mr. Neumann has been executive editor of Nephrology News & Issues since 1989.

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