

Central Carolina Kidney Associates, P.A. (336)584-4913 www.centralcarolinakidney.com

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Elizabeth Brown
Andrea Emanuel, PhD
Acute Care Services Committee Staff
Department of Health and Human Services
Division of Health Service Regulation
Healthcare Planning
809 Ruggles Drive
Edgerton Building
Raleigh, NC 27603

RE: Petition to the SHCC to add a policy to the State Medical Facilities Plan that would allow SNFs to operate 1-2 dialysis stations in each nursing home

Dear Members of the Committee,

We are writing to you in opposition to Liberty Heathcare & Rehabilitation's petition because of our patient safety concerns raised by this petition. The petition correctly summarizes and highlights the burden of dialysis on patients with End Stage Kidney disease who have to undergo Hemodialysis treatments several times per week as a life sustaining therapy. It also highlights the difficulties faced by nursing home patients requiring transportation to the dialysis centers.

We are not against provision of dialysis services in Nursing Homes given the burden on patients. However, we would like the committee members to realize that nursing home patients have multiple severe health conditions. These patients are at risk of many complications during the dialysis procedure, for example, blood pressure fluctuations, electrolyte abnormalities, heart rhythm irregularities and complications related to their dialysis access such as prolonged bleeding and clotting of access. Performing dialysis in a nursing home by non-dialysis trained



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staff and without the supervision of experienced dialysis specialty nurse and nephrology trained physician is unsafe and irresponsible.

Portable dialysis machines with newer technology can be utilized to provide dialysis at home and other settings. However, home hemodialysis patients are carefully selected. They are relatively healthier with much fewer co-morbid illnesses. They usually have a spouse or other dedicated partner who have undergone at least 8 weeks (about 2 months) of training before they are allowed to use these machines.

We hope the committee with take these safety concerns into account before making their final decision.

Sincerely,

Harmeet Singh, MD

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