

Public Hearing Comments

ESRD Pilot Demonstration Project Petition

Presented by Timothy Walsh, Director of Business Development

Good afternoon. My name is Tim Walsh and I am here with David Holmes on behalf of Liberty Healthcare and Rehabilitation Services (“Liberty”). Liberty will be submitting a Summer Petition to request a nursing home dialysis pilot demonstration project of six outpatient dialysis stations in Mecklenburg County in the 2023 State Medical Facilities Plan (“SMFP”).

Reasons for the Proposed Adjustment

Earlier this year, Liberty presented a Spring Petition to the State Health Coordinating Council (“SHCC”) requesting the addition of Policy ESRD-4 to the 2023 SMFP, which would have allowed the provision of dialysis services to skilled nursing facility (“SNF”) residents at the facility where they live rather than requiring them to be loaded onto transport vans multiple times each week and driven to a community dialysis center for treatment. The dialysis services proposed would be provided via an approved dialysis provider and in accord with all applicable state and federal regulations governing dialysis services.

The Healthcare Planning and Certificate of Need staff recommended denial of Liberty’s Petition, largely because they believed that the SMFP’s existing summer petition process is sufficient to allow Liberty to develop the proposed services. The Acute Care Services Committee, while noting support for the notion that this request would be positive for North Carolina residents, voted to accept the Agency recommendation and deny the Petition. Based on those votes and that guidance, Liberty is now bringing this demonstration project before the SHCC as a Summer Petition.

Liberty has great respect for the work of the Agency staff and the SHCC and its committees, and based on the staff’s and SHCC’s suggestions, is moving forward with this Summer Petition for a

nursing home dialysis pilot demonstration project of six outpatient dialysis stations in Mecklenburg County allowing the development or expansion of a kidney disease treatment center at Royal Park of Matthews. Liberty believes the demonstration project proposed will demonstrate to the Agency staff and the SHCC that a program like the one being proposed will work.

The Summer Petition being proposed is similar to the Spring Petition previously proposed by Liberty. The main difference is, instead of a request for a new Policy, Liberty is requesting a facility need determination for the proposal. This would represent a modification to Chapter 9 of the SMFP, and specifically to Chapter 9D, which would now include the following:

Table 9D: Dialysis Station Need Determination by Facility

A	B	C	D	E
County	Facility Identification Number	Provider Number	Facility	Facility Station Need Determination
Mecklenburg	TBD	TBD	Royal Park of Matthews	6**

***In response to a petition from Liberty on behalf of Royal Park of Matthews, the State Health Coordinating Council approved an adjusted need determination for six dialysis stations in Mecklenburg County to be included in a demonstration nursing home-only dialysis facility. This is a nursing home dialysis demonstration pilot project that is in the inventory but is not included in need determination calculations.*

Conclusion

Liberty wishes to emphasize that there is no intention to use the proposed pilot demonstration project to replace outpatient dialysis facilities in the community. Liberty sees a need for the delivery of dialysis services in both environments. However, Liberty has identified significant issues involving barriers to safe and convenient care, disruption of the lives of, and costs to nursing home residents that this proposed model will address. We urge the SHCC to approve Liberty’s Petition for the demonstration project we have requested.

Thank you for your time and I am happy to answer any questions the SHCC might have.