

Franciscan Health System

MEMORANDUM

To: John Hilger
Department of Health

From: Marla Fredericks, RN BSN CNN
Regional Director Nephrology
Franciscan Health System

Date: December 13, 2013

Re: Dialysis Rulemaking Response to Department of Health

1. Home Hemodialysis/PD Training Service:

FHS is supportive of home hemodialysis and PD training to be “counted” as a service not a station.

2. Isolation Station:

FHS is supportive of isolation stations being considered as a +1.

3. Relief Valve for over capacity:

Franciscan Health System (FHS) proposes the following ‘remedy’ for facilities that are over capacity:

If a facility is operating for at least a 90 day period at or above 5.5 patients per station, it should be allowed to add up to 20% of its existing capacity (if it is able to add this capacity. This capacity could only be added if no construction is required. Data used to make this determination would be Northwest Renal Network data submitted to CrownWeb. Station numbers would be rounded up.

4. Tri-State Hospital Proposed Language:

FHS has no opinion but think it is important for providers to be able to serve their patients.