

TO: Bart Eggen, Executive Director, Community Health System
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FROM: Stan Bower, Director of Operations
Stan Bower

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SUBJECT: Training Stations

Fresenius Medical Care



In order to meet the needs of health care consumers and purchasers, it is important to encourage the availability of training stations for home hemodialysis and home peritoneal dialysis (home therapies). Certificate of need (CN) rules should be modified to support that goal.

Background:

- Home hemodialysis is a separate modality from in-center hemodialysis.
 - Home hemodialysis typically requires training for approximately six to eight weeks, three times a week, for five to six hours at a time. After training is completed, dialysis is performed in the home on an on-going basis.
 - The patient and caregiver receive home therapy training in a space separate from the in-center hemodialysis stations.
 - Home hemodialysis training requires different equipment than equipment used by in-center programs. In-center programs operate dialysis machines typically off of a central reverse osmosis water purification system, (RO). Home hemodialysis does not operate on the same central delivery RO system. Home hemodialysis training uses portable dialysis machines on portable RO systems to train patients and caregivers how to use the portable systems in the home setting.
- Home peritoneal dialysis training is also a separate modality from in-center hemodialysis.
 - Home peritoneal dialysis is either continuous ambulatory peritoneal dialysis (CAPD) or continuous cycler-assisted peritoneal dialysis (CCPD). While the former requires no machine, the later requires a machine called a cycler.
 - For each type of peritoneal dialysis, training is required for the patient.
 - While 14 days of training is allowed by Medicare, training usually takes five to seven days, five times a week, for six to eight hours at a time. As with home hemodialysis, CAPD and CCPD training has its own equipment and does not use an in-center hemodialysis station.
- The CN Program requires that an in-center dialysis station be taken offline when a person is receiving training for either home hemodialysis or home peritoneal dialysis. This policy creates a challenge for dialysis facilities that are near or at capacity to meet the increased demand for home therapy training without negatively impacting existing in-center patients.

Request:

- In order to increase access for home therapy training, home therapies should not be counted in the CN methodology, but rather treated separately, subject to the following.
 - Training areas must be within an in-center dialysis facility by either being located within the dialysis facility or another in-center facility owned by the same company in the same or nearby planning area.
 - The maximum number of home therapy training areas is 20% of the total number of in-center stations, but in no case less than 2. Any number over ½ is rounded up to the next number.
 - Home therapy training areas must be used exclusively for training.