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MEMORANDUM

To: Janis Sigman, Program Manager
Certificate of Need Program

From: Jody Carona

Date: November 8, 2013

Subj: Puget Sound Kidney Centers' comments on Training and Isolation Stations

As follow up to the October 17, 2013, ESRD Rulemaking meeting, outlined below are Puget Sound Kidney Centers' (PSKC) responses re: use of stations:

1. Home Hemodialysis Training/Isolation Station/Incenter Station:

PSKC would use these stations interchangeably, requesting flexibility and counting "bodies in the chairs" as the ultimate decision point.

At any given time, PSKC would only have the number of patients authorized per the number of approved stations. In other words, if PSKC was approved for a total of 10 stations, they would dialyze no more than 10 patients at any given time.

Additionally, PSKC would only use an isolation station for non isolation patients if the facility did not have an isolation patient in its patient census. If a facility has an isolation patient in its census, the isolation station should only be used for the patient needing isolation (this is an infection control issue – eliminating the potential for cross-contamination). The isolation station would then be underutilized because it would not be used when the isolation patient was not at the center.

2. Peritoneal Dialysis (PD) Training:

PSKC's opinion is that a PD training space should be counted as a station.