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**MEMORANDUM**

To: Janis Sigman, Program Manager  
Certificate of Need Program

From: Jody Carona

Date: December 13, 2013

Subj: Puget Sound Kidney Centers' comments on Training, Isolation Stations  
and a 'Relief Valve'

As follow up to the November 14, 2013, ESRD Rulemaking meeting, outlined below are Puget Sound Kidney Centers' (PSKC) responses re: use of stations:

**1. Home Hemodialysis/PD Training Service:**

PSKC concurs that the equipment and spaces used for training (either home hemodialysis or PD) should be a service; not a station. This equipment and space would not be allowed to be used for incenter patients. Note: it is PSKC's position the 'stations' used for training are not counted in the facility's approved incenter capacity.

**2. Isolation Station:**

PSKC's opinion is that a facility's size should determine if the isolation is a +1 or +2. PSKC proposes the following:

If a facility has 18 stations or fewer stations: +1 isolation station

If a facility has more than 18 stations: +2 isolation stations

**3. Relief Valve:**

PSKC proposes the following:

Any facility whose Network data demonstrates that it has been operating above 5.0 for two consecutive quarters can submit a CN application to add the number of stations needed to reduce

the facility's census to 4.8<sup>1</sup>. This CN would be an expedited review. Station need would be automatically rounded up.

#### **4. Tri-State Proposal:**

PSKC is supportive to the language drafted by Tri-State.

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<sup>1</sup> Facilities located in the Counties assigned a 3.2 patient per station occupancy standard, would be able to apply when they achieved a 3.35 patient per station level for 2 or more consecutive quarters.