



STATE OF WASHINGTON
DEPARTMENT OF HEALTH
Olympia, Washington 98504

March 25, 2021

Austin Ross, Vice President of Planning
Northwest Kidney Centers

Sent by email: austin.ross@nwkidney.org

RE: Determination of Reviewability, Relocation Request #21-26 – Port Angeles Kidney Center

Dear Mr. Ross:

Thank you for your letter received on February 23, 2021, submitted by Northwest Kidney Centers (NKC) requesting relocation of NKC Port Angeles Kidney Center located in Clallam County. Below are the facts relevant to the relocation request and relied upon by the Certificate of Need (CN) Program in reaching its conclusion regarding your application.

HISTORICAL INFORMATION

- On October 16, 1987, Certificate of Need (CN) #906 was issued to Clallam County Public Hospital District #2 approving the establishment of a three-station outpatient dialysis center located at 939 Caroline Street in Port Angeles [98362], within Clallam County. Once operational, the facility was named Mount Olympus Kidney Center.
- On July 15, 1992, CN #1073 was issued to the public hospital district approving the addition of three stations to Mount Olympus Kidney Center. Historical records indicate that CN #1073 expired prior to its implementation and the dialysis center remained operational with three stations.
- On January 24, 1996, CN #1139 was issued to the public hospital district approving the addition of five stations to Mount Olympus Kidney Center. At project completion, Mount Olympus Kidney Center operated eight dialysis stations at 939 Caroline Street in Port Angeles.
- Historical records are unclear when NKC purchased Mount Olympus Kidney Center from the hospital district. However, on October 18, 2007, CN #1356 was issued NKC approving the addition of two dialysis stations to the center, for a facility total of ten stations. Under the NKC ownership, the dialysis center was renamed Port Angeles Kidney Center. The address of the dialysis center identified on CN #1356 is 809 Georgiana Street in Port Angeles [98362]. It is also unclear whether the dialysis center relocated or the address was reassigned by the post office.
- On March 30, 2018, CN #1708 was issued to NKC approving the addition of one isolation station as allowed under Washington Administrative Code (WAC) 246-310-809. CN #1708 was

effective on January 1, 2018.¹ On June 18, 2019, NKC requested to indefinitely postpone the isolation station adjustment at a number of dialysis centers, including Port Angeles Kidney Center. As a result, the dialysis center remained at 10 dialysis stations and does not currently operate an exempt isolation station as allowed under WAC 246-310-809. On October 1, 2019, CN #1708R was issued to NKC noting the adjustment.

Your February 23, 2021, letter requests relocation of the currently operational 10-station NKC Port Angeles Kidney Center in its entirety as allowed under WAC 246-310-830(4).

APPLICABLE STATUTE AND RULE

- RCW 70.38.105(3) requires the granting of a Certificate of Need or receipt of an exemption from the department prior to proceeding with a project that is subject to review.
- The department may grant an exemption under WAC 246-310-830(4) for the relocation of an entire kidney disease treatment center provided the following five requirements are met.
 - (a) The existing facility ceases operation;
 - (b) No new stations are added to the relocated facility;
 - (c) There is no break in service between the closure of the existing facility and the operation of the relocated facility;
 - (d) The existing facility has been in operation for at least five years at its present location; and
 - (e) The existing facility has not been purchased, sold, or leased within the past five years.

DETERMINATION OF REVIEWABILITY - PROJECT DESCRIPTION

- Historical documentation demonstrates NKC’s ownership since at least October 2007.
- The proposed site for NKC Port Angeles Kidney Center is 707 South Chase Street in Port Angeles [98362].² The current site and the new site are both located in Clallam County.
- NKC expects that the dialysis center would become operational at the new site by the end of January 2023. The existing facility would cease operation as a dialysis center at its current location once the relocated facility is operational and the staff and patients have relocated.
- No break in dialysis services would occur as a result of the relocation.
- A breakdown of the existing 10 stations for the new site is shown below.

	CMS Certified Stations	Stations Counted in Methodology
General Use In-Center Stations	8	8
Permanent Bed Station	1	1
Exempt Isolation Station	0	0
Isolation Station (not exempt)	1	1
Total	10	10

¹ It is noted that CN #1708 incorrectly identified 11 stations operational at Port Angeles Kidney Center, and with the isolation station adjustment the facility total was identified at 12 stations.

² The February 23, 2021, letter also notes that the city of Port Angeles may reassign this address based on the parking lot access.

- Consistent with WAC 246-310-800(11), NKC provided a floor plan showing the maximum allowable space for a 10-station facility with no future expansion stations is 2,713 square feet; the new site uses 2,039 square feet.

CONCLUSION

Based on the above information, the Certificate of Need Program concludes the NKC Port Angeles Kidney Center relocation project qualifies for a relocation under WAC 246-310-830(4). NKC must agree to the following conditions before the department will issue a Replacement Authorization for the relocated facility.

Conditions of Relocation Approval

1. Northwest Kidney Centers agrees with the project description. Northwest Kidney Centers further agrees that any change to the project as described above, requires new Certificate of Need Program review.
2. Northwest Kidney Centers agrees, in adherence to WAC 246-310-830(4)(a), that the existing kidney dialysis facility located at 809 Georgiana Street in Port Angeles will cease operation after the relocation.
3. Northwest Kidney Centers agrees, in adherence to WAC 246-310-830(4)(c) there will be no break in service between the closure of the existing kidney dialysis facility and the operation of the replacement facility.

You have two options, either accept or reject the above in its entirety. If you accept the above in its entirety, your request will be approved and a Relocation Authorization for the project will be issued. If you reject any provision of the above, you must identify that provision, and your request will be denied because approval would not be consistent with applicable Certificate of Need review criteria.

Please notify the Department of Health within 20 days of the date of this letter whether you accept the conditions above. Your written response can be sent to karen.nidermayer@doh.wa.gov.

If you have any questions or would like to arrange for a meeting to discuss our decision, please contact me at (360) 236-2955.

Sincerely,



Eric Hernandez, Program Manager
Certificate of Need
Community Health Systems