

November 1, 2022

Eric Hernandez, Program Manager  
Certificate of Need Program  
Department of Health  
P.O. Box 47852  
Olympia, WA 98504-7852  
*Sent via [fslcon@doh.wa.gov](mailto:fslcon@doh.wa.gov)*

Dear Mr. Hernandez:

On August 25, 2022, consistent with the Department's August 9, 2022, COVID-19 Waiver offboarding guidance/process powerpoint, Northwest Kidney Centers (NKC) submitted a letter of intent to retain seven dialysis stations currently set up and operating at NKC Seattle.

Per WAC 236-310-080, please accept this Certificate of Need letter of intent as notification of our continued interest and intent to submit a certificate of need application by December 1, 2022. Consistent with WAC, the following information is provided:

1. A Description of the Extent of Services Proposed:

NKC relocated seven dialysis stations from our NKC Elliott Bay Kidney Center to NKC Seattle Kidney Center under the Governor's Proclamation. Both facilities were located in the King 2 Dialysis Planning Area and while no increase in total planning area stations occurred; there was an increase at NKC Seattle; located at 548 15<sup>th</sup> Avenue, Seattle. We propose to retain these stations at NKC Seattle and use them to primarily support home back up and help mitigate caregiver/workforce shortages.

2. Estimated Cost of the Proposed Project:

There is no capital cost associated with the permanent relocation, and there was no cost when we relocated them from NKC Elliott Bay to NKC Seattle.

3. Description of the Service Area:

Per WAC 246-310-800(15)(a), the service area is the King County 2 Dialysis Planning Area.

We also have attached to this letter, a copy of our August 25 waiver notification letter of intent. Please feel free to contact me with any questions.

Sincerely,



Liz McNamara, MN, RN  
Vice President of Patient Care Services and Chief Nursing Officer

August 25, 2022

Department of Health

Sent via [COVIDwaiver@doh.wa.gov](mailto:COVIDwaiver@doh.wa.gov)

RE: Letter of Intent- COVID-19 Waiver (NKC Elliott Bay and NKC Seattle Kidney Centers)

As outlined in the Department's August 9, 2022, COVID-19 Waiver Offboarding guidance/process powerpoint, Northwest Kidney Centers (NKC) here within submits a letter of intent to retain seven dialysis stations currently set up and operating at NKC Seattle. These stations provide home training backup and other home training services. The following information is provided:

1. A Description of the Extent of Services Proposed:

NKC relocated seven dialysis stations from our NKC Elliott Bay Kidney Center to NKC Seattle Kidney Center under the Proclamation. Both facilities were located in the King 2 Dialysis Planning Area and while no increase in total planning area stations occurred; there was an increase at NKC Seattle; located at 548 15<sup>th</sup> Avenue. We propose to retain these stations at NKC Seattle and use them to primarily support home back up and caregiver/workforce shortages.

2. Estimated Cost of the Proposed Project:

There is no capital cost associated with the permanent relocation, and there was no cost when we relocated them from NKC Elliott Bay to NKC Seattle.

3. Description of the Service Area:

Per WAC 246-310-280, the service area is the King County 2 Dialysis Planning Area.

In addition to the above, the following patient transition plan information is being provided.

- 1. The average number of patients:** Assuming three shifts per day, six days per week, the seven stations can accommodate up to about 35-40 patients per week.
- 2. Identification of similar facilities that could provide care to patients:** NKC estimates that there are five other dialysis facilities located within a 30-minute drive time (one way) of NKC Seattle. Network data suggest that a few have available capacity, but it has been our experience that they are currently constrained by workforce shortages. We do not have confidence


that these facilities would be readily and reliably able to support patients with back-up dialysis needs. As was discussed with CN Program staff on August 3, 2022, because these patients usually dialyze at home, they do not have a set incenter dialysis schedule. And, when these patients need in center dialysis ( home back up), they must be fitted into open times that the dialysis facilities have available for incenter patients. Because of limited staffing, these options have been less and less available.

**3. Steps to be taken for patients to be transition, if needed:** We believe that not all of these facilities are consistently operating at 3 shifts per day, 6 days a week because of workforce shortages. If a CN is denied, we will stop accepting new patients for in-center back-up at NKC Seattle; and will attempt to keep open a few daytime slots at each of our other facilities in the area so that they are better able to accept these patients. This means however, that most new patients will be "bumped" to evening slots, which is less than desirable as they learn to acclimate to dialysis, and to stabilize. Depending on the patient's location, evening transportation to and from dialysis can be challenging to obtain. The patients that are most impacted by this tend to be low income.

**4. Timeline for transitioning clients to CN approved facilities/services if an application is denied:** We estimate 60 days is required.

Thank you for your support in this matter. Please feel free to contact me with any questions.

Sincerely,



Liz McNamara  
VP of Patient Care Services, CNO