



May 30, 2025

Eric Hernandez, Acting Executive Director
Certificate of Need Program
Washington State Department of Health
111 Israel Road SE
Tumwater, WA 98501

Subject: FKC Fort Vancouver - Determination of Reviewability Request

Dear Mr. Hernandez:

Pursuant to Washington Administrative Code 246-310-050, Pacific Northwest Renal Services LLC submits this request for a determination of reviewability regarding a proposed expansion of home hemodialysis training services at its existing CN-approved kidney dialysis facility, Fresenius Kidney Care Fort Vancouver, in the Clark County ESRD Planning Area.

A check for the review fee of \$1,925.00, per WAC 246-310-990(1), has been mailed separately.

Please feel free to contact me if there are any questions on this DOR request. I can be reached at John.Rodriguez2@freseniusmedicalcare.com.

Sincerely,

A handwritten signature in black ink, appearing to read 'John', followed by a long horizontal line.

John Rodriguez, BSN, RN
Regional Vice President – Pacific Northwest
Fresenius Medical Care

Determination of Reviewability Request

Fresenius Kidney Care Fort Vancouver - Home Hemodialysis Expansion

Pursuant to Washington Administrative Code (“WAC”) 246-310-050, Pacific Northwest Renal Services LLC (“PNRS”), a subsidiary of Fresenius Medical Care Holdings, Inc., submits this request for a determination of reviewability (“DOR”) regarding a proposed expansion of home hemodialysis training services at its existing CN-approved kidney dialysis facility, Fresenius Kidney Care Fort Vancouver (“FKC Fort Vancouver”), in the Clark County ESRD Planning Area.

Facility Information

- **Entity Name:** Pacific Northwest Renal Services LLC, a subsidiary of Fresenius Medical Care Holdings, Inc.
- **Facility Name:** Fresenius Kidney Care Fort Vancouver
- **Facility Address:** 13118 Northeast 4th Street, Vancouver, Washington 98684
- **CMS Certification number (CCN):** 502522
- **Planning Area:** Clark County
- **Most Recent CN-Approval / Exemption Activity:** CN #1731 dated March 30, 2018; Replacement Authorization #104 dated December 9, 2020.
- **In-Center Station Count:** 24 general in-center and 1 isolation station.

Project Description

FKC Fort Vancouver is a CN-approved kidney dialysis facility in Clark County. It is CMS certified and actively provides in-center and home training services. For example, in the most recent 4Q2024 ESRD Network 16 Modality Report, FKC Fort Vancouver¹ reported 198 total patients, including 131 in-center hemodialysis (“HD”), 35 home hemodialysis (“HHD”), 11 continuous ambulatory peritoneal dialysis (“CAPD”), and 21 continuous cyclic peritoneal dialysis (“CCPD”) patients.

FKC Fort Vancouver currently has six rooms that can be used for home training, but space limitations impact its ability to accommodate multiple home hemodialysis trainings, which typically last 4-6 weeks. With home peritoneal dialysis (“PD”) training, clinic visits, and doctor days also requiring these rooms, the facility’s capacity for HHD training is restricted due to room availability. Currently, when all six rooms are in use, FKC Fort Vancouver is forced to delay training or schedule sessions at less-than-ideal times—early mornings or late evenings—which is not optimal for patients.

DOR Request

FKC Fort Vancouver has space available on its treatment floor to accommodate a home hemodialysis training space to expand additional capacity for HHD training services. FKC Fort Vancouver submits this DOR to confirm that the proposed HHD expansion is not a CN-reviewable activity.

¹ Listed as “PNRS Ft Vancouver” in modality report under CCN 502522.

Adding the proposed HHD training space would significantly increase flexibility and availability for HHD training. It would allow FKC Fort Vancouver to train more patients while also providing dedicated spaces for HHD training. This expansion would optimize the use of the existing six rooms, enabling more efficient scheduling for one-on-one training, home PD training, and clinic visits.

Additional Information

- **Cost estimate:** there are minimal costs anticipated to accommodate the proposed HHD expansion. There may be minor water treatment and equipment costs, but there is no proposed change to the treatment floor space.
- **Home Training Services Only:** FKC Fort Vancouver recognizes that determination regarding the proposed expansion associated with this DOR request will be limited to HHD training services, and any expansion of in-center services/stations will be subject to CN review and approval. Further, the proposed project will not impact their-center services performed at FKC Fort Vancouver.
- **Department's Historical Practice:** the Department has consistently determined that home dialysis training services are not subject to CN review. For example, Fresenius Medical Care is aware of several DORs in which the Department reached this conclusion, including but not limited to determinations regarding past Fresenius Medical Care DORs requests (e.g. DORs 21-33, 21-34, 21-35, 21-36). The following excerpts from the Department's DOR #21-35 decision are particularly instructive:
 - *"The Department does not currently conduct CN review for training space, rooms, or equipment ("training accommodations")";² and*
 - *"It is clear that since 2007, the Department has not considered dialysis training accommodations to be subject to CN review".³*
- **ESRD Network 16 Recommendation:** FKC Fort Vancouver's proposed HHD expansion is consistent with the recommendations from ESRD Network 16 leadership made in a March 27, 2025 email to the Department:
 - *"Home dialysis provides significant benefits, including improved quality of life, reduced medication dependence, fewer hospitalizations, and overall better patient outcomes. To support access to home dialysis, Comagine Health ESRD Network 16 requests that the Washington State Certificate of Need allow home dialysis training to take place in any appropriate area of a certified dialysis facility. We propose that training be permitted on the dialysis floor..."⁴*

² Determination of Reviewability #21-35. September 17, 2021. P. 4.

³ *Ibid.*

⁴ Barbara Dommert-Breckler. Email to Eric Hernandez and Christine Anderson. Subject: Expansion of home dialysis (peritoneal and home hemodialysis) training space. March 27, 2025.