

July 24, 2025

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

*Sent only via email:* [John.Rodriguez2@freseniusmedicalcare.com](mailto:John.Rodriguez2@freseniusmedicalcare.com)

**RE: Determination of Reviewability #25-13 – FKC Fort Vancouver**

John Rodriguez:

The Department of Health (Department) has completed the review of your request regarding the expansion of home hemodialysis (HHD) training services at Fresenius Kidney Care (FKC) Fort Vancouver in Clark County. The facility and HHD training services would continue to be located at 13118 Northeast 4th Street, Vancouver, [98684] within Clark County.

Below is the information considered, and the facts relied upon by the Certificate of Need (CN) Program in reaching its conclusion regarding your request.

**SOURCE INFORMATION CONSIDERED**

- Pacific Northwest Renal Services (PNRS) LLC's Determination of Reviewability request DOR25-13 received May 30, 2025
- PNRS's screening response and supplemental information received July 15, 2025
- CN Program's facility file for FKC Fort Vancouver
- Previous Approvals:
  - CN #1484 issued August 16, 2012
  - CN #1731 issued March 30, 2018
  - RA #104 issued December 9, 2020
- Chapter 246-310 WAC
- Chapter 70.38 RCW

**Key Facts Considered**

- Fresenius Kidney Care Fort Vancouver is located at 13118 NE 4th Street, Vancouver, WA 98684 within the Clark County ESRD Planning Area.
- FKC For Vancouver's CMS Certification Number (CCN): 502522.
- FKC For Vancouver currently operates 24 general in-center hemodialysis stations plus 1 isolation station.

- FKC Fort Vancouver currently offers HHD training services.
- Pacific Northwest Renal Services has confirmed that:
  - The project is not for a standalone training program.
  - The expansion of training services will not result in in-center stations being impacted or taken offline.
  - The expansion of training services will not reduce in-center capacity.
  - The facility's operations will remain consistent with all prior CN<sup>1</sup> and RA<sup>2</sup> approvals.

## **DEPARTMENT ANALYSIS**

### **Current Statutes and Rules**

Under RCW 70.38.105(3), persons may not engage in undertakings subject to Certificate of Need review without Department authorization. RCW 70.38.105(4)(a) and RCW 70.38.025(6) define kidney disease treatment centers as reviewable health care facilities.

WAC 246-310-800 through 246-310-830 specifically address kidney dialysis facilities. WAC 246-310-800(10) defines such facilities to include those providing outpatient dialysis and training. WAC 246-310-800(21) defines “training services” as those provided to home dialysis patients, explicitly excluding training space from the facility’s station count.

WAC 246-310-812 establishes need forecasting methodology but does not include home training space in station calculations. Past Department determinations have confirmed that expansions to training accommodations, when unrelated to in-center service changes, are not subject to CN review.

### **Department Evaluation**

Because FKC Fort Vancouver is an existing CN-approved kidney disease treatment center, the sole consideration is whether the proposed expansion of HHD training services constitutes a reviewable change. Based on the information provided, the proposed expansion:

- Does not alter FKC Fort Vancouver’s capacity;
- Does not alter FKC Fort Vancouver’s current operations;
- Is limited to home training accommodations.

## **CONCLUSION**

In conclusion, based on the totality of information considered, including a review of Chapter 70.38 RCW and WAC 246-310, the Department concludes that the proposed expansion of home

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<sup>1</sup> CN1731 Issued January 1, 2018, approving a one-time adjustment to add one station as an exempt isolation station and CN1484 Issued August 16, 2012, approving the establishment of a 24-station facility which will “provide hemodialysis, peritoneal dialysis, shifts after 5:00 p.m., and training/support for home and peritoneal dialysis patients.”

<sup>2</sup> RA104 Issued December 9, 2020, approving the relocation of FKC Fort Vancouver.

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hemodialysis training services at FKC Fort Vancouver is consistent with services already approved at the facility and **does not require Certificate of Need review**.

**APPEAL OPTION**

This decision may be appealed. You or any person with standing may request an adjudicative proceeding to contest this decision within 28 calendar days from the date of this letter. The notice of appeal must be filed according to the provisions of Revised Code of Washington 34.05 and Washington Administrative Code 246-310-610. A request for an adjudicative proceeding must be received within the 28 days at one of the addresses listed on the following page.

Mailing Address:

Department of Health  
Adjudicative Service Unit  
Mail Stop 47879  
Olympia, WA 98504-7879

Physical Address

Department of Health  
Adjudicative Service Unit  
111 Israel Road SE  
Tumwater, WA 98501

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

Sincerely,

A handwritten signature in black ink, appearing to read 'Eric Hernandez', is written over the printed name.

Eric Hernandez, Program Manager  
Certificate of Need  
Community Health Systems