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November 17, 2020

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

DOR21-16

Dear Mr. Hernandez:

Pursuant to Washington Administrative Code ("WAC") 246-310-050 and WAC 246-310-830 (4), Pacific Northwest Renal Services LLC submits this determination of non-reviewability ("DOR") regarding the relocation of its current CN-approved twenty-four (24) in-center and one (1) isolation room kidney dialysis center ("FKC Fort Vancouver").

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 503.507.4967 or Casey.Stowell@fmc-na.com.

Sincerely,

Casey Stowell

Casey Stowell
Regional Vice President – Pacific Northwest
Fresenius Medical Care

Fresenius Kidney Care Fort Vancouver
Determination of Non-Reviewability Relocation Request

Existing Facility Address

The address of the existing facility, FKC Fort Vancouver, is:

312 SE Stone Mill Dr, Suite 150
Vancouver, WA 98684

New Facility Address

The address of the new FKC Fort Vancouver facility is:

13118 NE 4th Street,
Vancouver, WA 98684¹

WAC 246-310-830 (4)(a)

(4) When an entire existing kidney dialysis facility proposes to relocate all of its stations within the same planning area, a new health care facility is not considered to be established under WAC [246-310-020](#) (1)(a) if:

(a) The existing kidney dialysis facility ceases operation after the relocation;

Confirmed, the existing FKC Fort Vancouver clinic will cease operations after the relocation.

WAC 246-310-830 (4)(b)

(b) No new stations are added to the replacement kidney dialysis facility. The maximum treatment floor area square footage as defined in WAC [246-310-800](#) (11)(a) is limited to the number of certificate of need stations that were approved at the existing facility;

No new stations will be added to the replacement clinic as a result of the relocation pursued in this DOR request.

Please see Exhibit 1 for treatment floor square footage calculations, including comparisons between the maximum treatment floor space allowable under WAC 246-310-800(11)(a) and the actual square footage at the new site. As demonstrated in Exhibit 1, the actual square footage (5,180 SF) is less than the maximum allowable (7,263 SF).

Please see Exhibit 2 for the single line drawing.

WAC 246-310-830 (4)(c)

(c) There is no break in service between the closure of the existing kidney dialysis facility and the operation of the replacement facility;

¹ This is a newly demised suite and may get assigned a suite number by the City/and or Post office

There will be no break in service between the closure of FKC Fort Vancouver's existing clinic and the replacement facility becoming operational which is expected by July 2021.

WAC 246-310-830 (4)(d)

(d) The existing facility has been in operation for at least five years at its present location;

Fresenius has operated FKC Fort Vancouver at its current site for more than five years. Archived data from the CMS Dialysis Facility Compare website (dated October 23, 2014) lists FKC Fort Vancouver's (provider number 502522) address as 312 SE Stonemill Dr Suite 150, Vancouver, WA, 98684.² Therefore, there is publicly available documentation that FKC Fort Vancouver has been in operation for over five years at its present location.

WAC 246-310-830 (4)(e)

(e) The existing kidney dialysis facility has not been purchased, sold, or leased within the past five years.

FKC Fort Vancouver has not been purchased, sold, or leased within the past five years. Therefore, it satisfies WAC 246-310-830 (4)(e).

² See DFCArchive Revised FlatFiles 20141023.zip at <https://data.medicare.gov/data/archives/dialysis-facility-compare>

Exhibit 1.
Treatment Floor Square Footage Calculations

FKC Ft. Vancouver

Relocation of 24 stations + 1 isolation room

Maximum Allowable Treatment Area Table

[WAC 246-310-800 \(11\)](#)

AREA	ALLOWABLE SF	Units	# STATIONS	CALCULATED SF
General use/non-isolation	150	sf/station	23	3,450
Bed station / non-isolation	200	sf/station	1	200
Isolation station	200	sf/station	1	200
Future expansion stations	150	sf/station	2	300
Subtotal				4,150
Other treatment	75%	% of Subtotal		3,113
Maximum Treatment S.F. Area				7,263

Actual Square Footage Table

AREA	ACTUAL UNIT SF	Units	# STATIONS	ACTUAL SF
General use/non-isolation	80	sf/station	23	1,840
Bed station / non-isolation	100	sf/station	1	100
Isolation station	137	sf/station	1	137
Future expansion stations	80	sf/station	2	160
Subtotal				2,237
Other treatment				2,943
Actual Treatment S.F. Area				5,180
Non-Treatment Floor Space				9,841
Actual Total Clinic S.F. Area				15,021

<u>Total Maximum Treatment SF</u>		<u>ACTUAL Treatment SF</u>
7,263	>	5,180

Exhibit 2.
Single Line Drawing



LEGEND	
	TREATMENT STATIONS
	OTHER TREATMENT AREA
	FUTURE STATIONS

CON FLOOR PLAN FOR:

FT VANCOUVER, WA

PROJECT #004686-5-RL-W-BO-2018

ADDRESS: 13118 NE 4TH STREET, WA 98684

DRAWN BY:

GROSS SQUARE FOOTAGE:

NET SQUARE FOOTAGE:

TREATMENT SQUARE FOOTAGE:

SCALE: NOT TO SCALE

SSM

15,021 SF

14,432 SF

5,180 SF

