

October 8, 2013

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**OCT 15 2013**

**HEALTH FACILITIES &  
SERVICES REVIEW BOARD**

Ms. Kathryn Olson  
Chairwoman  
Illinois Health Facilities & Services Review Board  
525 West Jefferson, 2<sup>nd</sup> Floor  
Springfield, IL 62761

**Re: Opposition Comments, #13-049 Nocturnal Dialysis Spa, LLC**

Dear Ms. Olson:

I am a nephrologist in the western suburbs and am the medical director at the Fresenius DuPage West and Naperville North dialysis clinics and previously the Glendale Heights clinic. I am aware of the Nocturnal Dialysis Spa CON application to open a dialysis clinic in Villa Park which intends to offer regular dialysis on the first and second shift, and nocturnal dialysis on the third shift. First, this is odd because nocturnal dialysis is usually offered at night. Possibly the application means no traditional third shift will be offered but there will be a "nocturnal" shift. I do not think this facility is necessary because there are under-utilized facilities in the area, and also Fresenius Medical Care and other providers have offered nocturnal dialysis for many years. In my experience, the patient demand for nocturnal dialysis is simply not there. The application says that the facility "can accommodate" 24 nocturnal patients, which is different than saying there are 24 patients who want nocturnal dialysis. If in fact there are that many patients I am certain existing providers would offer nocturnal dialysis to these patients – there is no reason they would not.

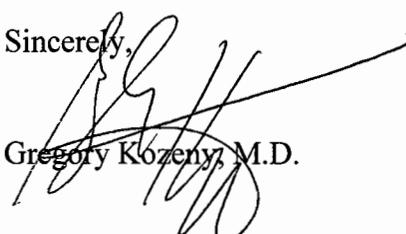
Several years ago at the Fresenius Glendale Heights facility we offered the patients three daily traditional dialysis shifts and also a nocturnal shift where patients essentially came to the clinic to go to bed at night and receive treatment at the same time. While there are numerous benefits to nocturnal dialysis, which is a longer slower treatment, most patients do not like it because they still have to come three times a week. Also the patients who tried it for the most part found that they preferred to be at home during the sleep-time hours and had difficulty securing transportation late at night and in the pre-dawn hours. They asked to return to "traditional" dialysis shifts. The lack of interest in nocturnal is certainly not because patients are not informed. Chronic Kidney Disease (CKD) and new ESRD patients are educated on all the treatment options consisting of Transplant, Hemodialysis including nocturnal, Peritoneal Dialysis and Home Hemodialysis. As the medical director of the DuPage West and Naperville North facilities, I would welcome

the opportunity to work with Fresenius Medical Care in providing nocturnal dialysis once again if there are area patients who want this option.

The establishment of a new facility to offer nocturnal dialysis as a treatment shift option is not necessary. Nocturnal dialysis can be offered at any facility currently operating in the Villa Park area.

Thank you for the opportunity to give you my comments on nocturnal dialysis.

Sincerely,



Gregory Kozeny, M.D.