

NOTICE OF INTENT  
CERTIFICATE OF PUBLIC REVIEW

1. Name of Applicant:Nephrology Associates, PA
2. Address:4923 Ogeltwon-Stanton Rd Suite 200 Newark, De 19709
3. Telephone: 302-225-3622 \_ Fax: 302-225-0470\_  
Email:dfisher@delawarekidney.com
4. Person to Contact:David M Fisher \_\_\_\_\_
5. Type of Ownership:  
 Public                       Proprietary (Individual)  
 Private Non-profit       Proprietary (Partnership)  
 Proprietary (Corporation)
6. Anticipated Date of Filing Application:Feb 2022 \_\_\_\_\_
7. Estimated Capital Expenditure:\$150,000 \_\_\_\_\_
8. Please attach a brief Narrative (one page or less if possible) which describes the project.
9. STATEMENT OF CERTIFICATION:

The statements and information provided herein are true and correct to the best of my knowledge and belief.

DocuSigned by:  
*David M. Fisher*  
EEEAB910A4114B7...

12/30/2021

Signature of Chief Executive Officer

Date



# NEPHROLOGY ASSOCIATES

## Providers

Feroz Abubacker, M.D.  
Piyaporn Apivatanagul, M.D.  
Manmeet Brar, M.D.  
Peter Burke, D.O.  
Helen Chang-DeGuzman, M.D.  
Farhana Chowdhury, M.D.  
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Daniel N. Coar, M.D.  
William J. Dahms, Jr. D.O.  
Nealanjon Das, D.O.  
Svastijaya Daviratanasilpa, M.D.  
Manthodi K. Faisal, M.D.  
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Martin F. Gavin, D.O.  
Ranine Ghamrawi, M.D.  
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Collette J. Mehring, D.O.  
G. Jeffrey Milan, M.D.  
Wilson Nino, M.D.  
Rabail Qureshi, M.D.  
Theodore F. Saad, M.D.  
Sangeetha Satyan, M.D.  
Shalini Sehgal, M.D.  
Lindsey M. Slater, M.D.  
Prayus T. Tailor, M.D.  
Jean Ann M. Yaccino, D.O.  
Miroslaw P. Zdunek, M.D.

## Locations

4923 Ogletown-Stanton Rd., Ste 200  
Newark DE 19713  
P (302) 225-0451 F (302) 225-0472

St. Francis MSB  
701 N. Clayton St., Ste 401  
Wilmington, DE 19805  
P (302) 421-9411 F (302) 421-9460

137 West High St., Ste 1A  
Elkton, MD 21921  
P (410) 620-9200 F (410) 620-9207

104 Sleepy Hollow Drive, Ste 207  
Middletown, DE 19709  
P (302) 574-6800 F (302) 378-9888

1198 S. Governors Avenue,  
Building B, Suite 100  
Dover, DE 19904  
P (302) 734-3227 F (302) 734-0391

201 West Liberty Way  
Independence Commons  
Milford, DE 19963  
P (302) 424-3694 F (302) 424-3697

34434 Kings Street Row, Ste 4  
Lewes, DE 19958  
P (302) 360-0142 F (302) 360-0145

## Vascular Access Centers

1092 Old Churchmans Road  
Newark, DE 19713  
P (302) 472-9880 F (302) 472-9614

201 West Liberty Way  
Independence Commons  
Milford, DE 19963  
P (302) 424-3694 F (302) 424-3697

[www.delawarekidney.com](http://www.delawarekidney.com)

December 30, 2021

Delaware Health Care Commission

Delaware Health Resources Board

RE: Certificate of Public Review – Notice of Intent

Brief Project Narrative

Nephrology Associates, P.A. (NAPA) has operated a Vascular Access Center (VAC) in Newark for 17 years. Currently, the VAC operates as an extension of practice (EOP), licensed by the State of Delaware, and accredited by the Accreditation Association for Ambulatory Health Care (AAAHC). NAPA is the only nephrology practice in the State of Delaware with Interventional Nephrologists specifically trained in management of dialysis vascular access. These services to patients in Delaware are essential for them to receive life-sustaining dialysis treatments.

NAPA plans to convert the VAC to a free-standing Ambulatory Surgery Center (ASC) to continue providing high-quality, efficient, convenient, and cost-effective vascular access services to dialysis patients in Delaware. Severe reductions in payment, starting in 2017 and proposed for 2022; are seriously threatening our ability to maintain operations of the VAC

NAPA is concerned that if we close or reduce services at the VAC patient care will suffer and will have no alternative other than the hospital for these procedures, essentially “turning back the clock” on major progress in efficiency, cost-effectiveness, and quality of care. The sheer volume and immediacy of these procedures cannot be absorbed using existing community resources. If the VAC operations are reduced or closer will inevitably result in delayed care, missed dialysis treatments, and increased morbidity, leading to increased hospital admissions and increased use of catheters for dialysis care. Additionally, care provided in the hospital setting is significantly more expensive than in EOP or ASC settings, potentially adding to the already high cost of caring for End Stage Renal Disease (ESRD) patients. Taking these procedures to the hospitals is directly contrary to CMS initiatives to enhance accountability through a shared-risk payment model, known as “Comprehensive Kidney Care Contracting” (CKCC), which is designed to improve outcomes and reduce the overall cost of care for patients with chronic kidney disease (CKD) and ESRD. NAPA is currently taking steps to participate in this and other shared-risk payment models.



# NEPHROLOGY ASSOCIATES

The VAC was built 17 years ago to existing ASC Life Safety Code and State of Delaware standards. NAPA is aware that AIA guidelines and State Standards per the Delaware Office of Health Care Licensing and Certification. NAPA plans to make any necessary changes to the facility to ensure it is compliant with all required Codes and Guidelines.

In summary, changing to an ASC is a vital for us to continue providing the highest quality, timely, efficient, and cost-effective vascular-access care to our patients who and/or will receive dialysis.

Sincerely,

DocuSigned by:

*David M. Fisher*

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