



Larry Hogan, Governor · Boyd K. Rutherford, Lt. Governor · Robert R. Neall, Secretary

Commission on Kidney Disease
Eva Schwartz, Executive Director
4201 Patterson Avenue
Baltimore, MD 21215

October 25, 2019

Dear Medical Directors and Administrators,

We are writing this letter out of concern for the ongoing trend in nursing staff shortages in some outpatient units. There are many instances of a single nurse taking care of up to 18 patients. While we understand that there are circumstances which lead to staff exceptions, the frequency and even persistence despite recurrent citations of the unit is quite alarming.

We do recognize that there are challenges in retention and recruitment of nursing staff. However, the staffing of dialysis units is fundamentally established to ensure that patients are provided with safe and effective treatments. Consequently, the scope of responsibility for the nurses extends far beyond the individual patient's pre and post treatment assessments and medication administration. The nursing obligation ranges from supervision of the dialysis technicians to maintaining appropriate infection control practices and adherence to the physician orders. This directive is especially true with the increase in the age and complexity of the dialysis population, who frequently require more nursing oversight. Inadequate staffing long term can adversely impact patient outcomes, adherence to orders, potential warning signs in the unit or patients, and increase breaches in infection control.

It is imperative that the administrators, medical directors, and governing bodies of these facilities routinely evaluate the staffing ratios to guarantee that there are enough personnel to deliver the care needed by these patients, thus avoiding compromises in healthcare or safety. When the Commission approves your Plans of Correction, the expectation is that these deficiencies will be rectified immediately, and indefinitely. Continuing operations without the appropriate staff for the unit is unacceptable and in violation of Commission regulations governing standard of care.

Sincerely,


Dr. Donna Hanes
Commission Chairman