

Dr. Sandra Greene Chair, State Health Coordinating Council  
 North Carolina Division of Health Service Regulation  
 Healthcare Planning and Certificate of Need Section  
 2704 Mail Service Center  
 Raleigh, NC 27699-2704

Dear Dr. Greene and The State Health Coordinating Council Members:

Thank you for the opportunity to comment to the State Health Coordinating Council in reference to the Special Needs petition for a Hospice Home Care Office in Mecklenburg County submitted by Heart ‘N Soul, dba HNS of the Carolinas. Carolina Caring **opposes** this petition and believes that Mecklenburg County is adequately serving the African American community and other minority communities in the county.

Mecklenburg County is currently served by over 20 licensed Hospice organizations all of which have specific initiatives to increase access to care and promote health equity. Per the below chart, the death service ratios for the African American and Asian populations in Mecklenburg County are higher than the state average. This demonstrates that the Black and Asian populations are being reached and cared for better in Mecklenburg than those in the state as a whole. This often results in patients spending their final days with enhanced comfort, dignity, and a deeper sense of humanity.

**DEATH SERVICE RATIO BY RACE/ETHNICITY**

Mecklenburg County, NC

Year	ALL	BLACK	HISPANIC	ASIAN	NATIVE	WHITE
2014	51.5	43.0	40.9	37.7		55.5
2015	52.8	40.6	39.1	45.9		58.0
2016	56.8	42.7	55.3	43.8		62.9
2017	54.4	42.6	51.4	44.1		59.9
2018	56.5	44.5	49.0	42.1		62.6
2019	53.5	44.2	45.8	41.0		58.5
2020	53.1	43.1	27.9	37.8		59.0
2021	52.6	41.9	31.4	37.9		59.2
2022	54.2	44.3	41.9	35.3		60.3
2023	57.1	45.8	32.4	54.5		63.8

**DEATH SERVICE RATIO BY RACE/ETHNICITY**

North Carolina

Year	ALL	BLACK	HISPANIC	ASIAN	NATIVE	WHITE
2014	46.1	35.7	39.0	38.0	33.8	48.7
2015	47.2	36.5	39.0	45.3	31.0	49.9
2016	48.7	37.5	47.7	42.5	41.3	51.5
2017	49.2	38.3	44.3	44.5	39.6	52.0
2018	49.2	38.2	39.0	41.1	42.0	52.1
2019	50.5	40.1	42.2	39.6	47.7	53.3
2020	47.9	37.0	29.2	39.2	42.9	51.1
2021	46.8	36.0	31.5	38.3	38.8	50.0
2022	49.1	37.9	39.5	36.3	43.1	52.2
2023	52.3	41.1	38.4	45.8	44.2	55.4

**While there is always room for improvement, the data clearly demonstrates that the notion of underutilization of hospice care among racial and ethnic minorities in Mecklenburg County is unfounded.** Mecklenburg County continues to experience an increase in the number of African American deaths being served with hospice, ensuring that their needs are comprehensively met.

As shown in the chart below, **39%** of Carolina Caring’s hospice service users in Mecklenburg County are from minority backgrounds. We are committed to providing hospice care wherever patients consider home, with a focus on a comfortable and familiar environment, surrounded by loved ones.

Additionally, the chart below highlights how our efforts align closely with the demographic composition of the community.

- We serve a significant proportion of the Black community, nearly matching the general population (30% vs. 32%).
- We have observed a substantial increase in the number of Hispanic patients we serve, with a 600% rise from 2023 (from 1 to 7 patients). Should this trend continue, we project a 1100% increase by the end of 2024 (from 1 to 12 patients).
- Similarly, our Asian patient population has already increased by 266% in the first seven months of 2024 compared to last year (from 3 to 11 patients). If this trend persists, we anticipate a 533% increase for the full year (from 3 to 18 patients).
- To effectively serve our diverse populations, we employ a notably high percentage of diverse staff in Mecklenburg County, with 50% Black and 60% minority representation. This strategy underscores our commitment to culturally competent care and our efforts to build trust and sustain relationships within underserved communities.

**Carolina Caring’s Admission Trend Data for Mecklenburg 2021-2024 YTD**

Race / Ethnicity	2021	2022	2023	As of July 2024	Total	% Served of our total pop	Meck County Population Statistics 2021
White	32	66	53	54	205	61%	45%
Black or African-American	25	31	28	18	102	30%	32%
Hispanic or Latino	8	3	1	7	19	6%	14%
Asian	1	3	4	3	11	3%	6.00%
American Indian/Alaska Native	0	0	0	0	0	0	0.30%
Two or More Races	0	0	0	0	0	0	2%
<b>Grand Total</b>	66	103	86	82	337	100%	100%

Carolina Caring’s team, deeply rooted in the community for over 45 years, brings a wealth of lived experiences that span various racial, ethnic, and religious identities. This deep cultural connection underscores our commitment to providing empathetic and informed care that resonates with the diverse needs of the communities we serve. Our team undergoes annual cultural competency training and has established an internal diversity, equity, and inclusion resource group named Carolina Caring

United, which is dedicated to enhancing cultural awareness and fostering participation in diverse cultural activities throughout the year.

Carolina Caring actively collaborates with community partners across Mecklenburg County, including community health workers, free and reduced health clinics, and senior centers. Our engagement in these historically underserved communities allows us to educate about hospice services and engage in meaningful discussions that respect and honor cultural beliefs and values. This commitment ensures we deliver responsive healthcare where it's most needed.

Recognizing the complexity of this vital work, Carolina Caring invests time in cultivating genuine relationships with community leaders, enhancing trust and improving the accessibility and quality of hospice care for everyone. Our palliative medicine program, which offers care at home for individuals with serious or chronic illnesses, is particularly beneficial in these communities. We understand the heightened vulnerability of these populations to such health conditions, and our early involvement is proving to have significant benefits.

While we acknowledge the intent behind the recent petition advocating for improvements in reaching minority populations, we believe the needs are already being met. Our ongoing efforts and data show substantial progress in serving these communities effectively. The petition also lacks evidence that a minority-owned and operated hospice would inherently provide better service or outreach to underserved populations. Notably, similar claims have not been substantiated in other states.

The chart below illustrates a significant discrepancy in the effectiveness of the petition's outreach efforts across different racial groups from 2022 to 2023. Despite a 70% overall increase in admissions, the distribution among racial groups was uneven. The data shows a 122% increase in the percentage of White patients served, rising from 1.8% to 4%. In contrast, the percentage of Black patients served increased by only 56% (3.7 to 5.8%). This suggests that while the petition claims to focus on minorities, its initiatives may not be as effective in reaching or appealing to Black communities compared to White communities. This raises questions about the equity of the petition's outreach strategies and the need for targeted improvements to better serve minority populations.

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## SHARE OF PATIENTS SERVED BY RACE/ETHNICITY

HEART AND SOUL HOSPICE LLC - 441605

Davidson County, TN

Year	All	Black	Hispanic	Asian	Native	White
2014						
2015						
2016						
2017						
2018						
2019						
2020						
2021	0.4%					
2022	2.3%	3.7%				1.8%
2023	4.3%	5.8%				4.0%

This signifies how hard it is to build trust and deliver care models that make progress in reaching these communities. We believe that expanding the number of programs in these communities, as suggested by the petition, would only dilute the focused and effective care we are committed to enhancing.

Furthermore, comparative data from the recent Hospice Care Index, a component of the CMS Hospice Quality Reporting Program Requirements, indicates that Heart N' Souls performance (8) is below both national (8.8) and state averages (9.2), which suggests that changing the provider may not lead to the improvements the petition anticipates. Additionally, in 2023, the petition reported no General Inpatient (GIP) or Continuous care among 172 patients, highlighting a gap in providing higher levels of care

In conclusion, Carolina Caring believes the petition in question is unnecessary, as all hospice agencies in North Carolina are committed to serving anyone in need, regardless of race, gender, or ethnicity. We are confident that the numerous organizations already serving Mecklenburg County are effectively improving access and ensuring that hospice services reach the right recipients at the crucial time they are most needed. Carolina Caring remains dedicated to the challenging yet vital work of reaching these underserved communities, reaffirming our unwavering commitment to health equity and our pledge to serve all members of our community with the highest standards of care and respect.

Thank you for your consideration.

Sincerely,



Dana C. Killian  
President & CEO  
Carolina Caring