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I apologize for the delay in submitting my comments. Thank you.

## PUBLIC HEARING COMMENTS

### PETITION TO REMOVE NEED DETERMINATION FOR ONE ADDITIONAL HOSPICE HOME CARE OFFICE IN HAYWOOD COUNTY FROM THE 2026 SMFP

**July 23, 2025**

Good afternoon,

As the CEO with Four Seasons, a nonprofit mission-driven, hospice and palliative care provider that has served Western North Carolina with Trusted Care for more than 40 years. Thank you for the opportunity to speak today.

We are here to respectfully request that the need determination for one additional hospice home care office in Haywood County be removed from the Proposed 2026 State Medical Facilities Plan.

We deeply appreciate the work that goes into the SMFP and the important role it plays in ensuring access to care across the state. But in this instance, we believe the need determination in Haywood County is not supported by the data—and if left unadjusted, may have unintended consequences for a community who is already being well served with high quality care from local hospice providers.

There are three key reasons we believe the need determination should be removed.

First, the projected statewide median percent of deaths served by hospice, which is used to calculate need, may be artificially inflated. The 2026 SMFP projects this figure to be 51.5%, appearing to be the highest in the history of the methodology. It appears to be based on a 6.7% growth rate, more than two-and-a-half times the long-term average. This spike is not the result of a system-wide surge in access to hospice. It rather appears to be a statistical illusion caused by the pandemic.

When COVID occurred, a large number of medically fragile individuals died sooner than expected. This occurrence, may commonly be known as mortality displacement or pull-forward deaths, caused total deaths to surge in 2020 and 2021. Then, deaths appear to have declined sharply in 2022 and 2023. Hospice deaths, however, held steady or increased slightly.

That means the denominator in the calculation reduced, while the numerator increased—causing the percentage of deaths served by hospice to rise rapidly, even though actual system demand appeared to remain stable. We believe that this may also be referred to as the “echo effect.” This methodology misinterprets the statistical rebound as sustained growth and builds it into the projection model—overstating future need.

Second, Haywood County’s five-year death rate, the key input used to project local hospice need, appears inflated because it includes three years of elevated mortality due to COVID.

Unlike the statewide pattern, where the pull forward effect occurred primarily in 2020 and 2021, Haywood County experienced three full years of elevated mortality. Deaths report to have increased over 24% from 2020 through 2022 compared to 2019 levels. These were not population-based increases, to our knowledge. But rather due to pandemic-driven losses, concentrated among our most vulnerable community members. Those deaths have already occurred, yet the methodology appears to treat them as the basis for future projections. As a result, the county’s five-year average death rate looks to be artificially elevated, having a similar impact on projected hospice need.

Third, utilization in Haywood County is already rebounding to pre-pandemic levels.

Hospice penetration appears to have dropped during COVID, as it did statewide, but it has since improved. In 2024, 42.1% of Haywood County deaths were served by hospice, up from just 33.9% in 2021, which is within two percentage points of pre-pandemic levels. This does not appear to demonstrate a system in crisis, but rather a system that is progressing and recovering to meet the needs of those within the communities we serve every single day.

Lastly, I would like to emphasize that Four Seasons is a high-quality provider with a deep commitment to this community. We scored 99.5% on CMS’s Comprehensive Assessment measure and earned a perfect 10 on the national Hospice Care Index, and continue to be recognized as a Hospice Honors organization. In 2024, we served 228 hospice admissions and provided over 11,000 days of care in Haywood County. This is strong and we are committed to continuing to provide trusted care with strength for the community.

In closing, we respectfully request the State Health Coordinating Council to consider removing the need determination for Haywood County so that planning decisions reflect true community need, not temporary pandemic effects.

Thank you for your time and for your continued commitment to data-informed, patient-centered care. We are honored to provide trusted care within North Carolina.

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