



Saturday, July 19, 2025

Dear Members of the NC State Health Coordinating Council (SHCC),

We appreciate the opportunity to provide comments on the Hospice Chapter of the proposed 2026 State Medical Facilities Plan (SMFP).

As you are aware, the Proposed 2026 SMFP includes an unprecedented number of need determinations for hospice home care agencies. Our team at Teleios Collaborative Network (TCN) has conducted a thorough review of statewide and county-level data to better understand the factors contributing to this surge.

Our analysis indicates a clear pattern consistent with a “pull forward” or mortality displacement phenomenon resulting from the COVID-19 pandemic. Statewide deaths spiked significantly in 2020 and 2021, particularly among fragile, hospice-appropriate patients. As hospice providers resumed full operations in 2022–2024, penetration rates rebounded—not due to systemic under-service, but because providers were once again able to serve appropriate patients. This rebound has artificially inflated the growth rate of the statewide median deaths served, distorting what should otherwise be a stable planning metric.

We reviewed death and hospice admission data for counties generating a need determination and observed similar trends.



The table below illustrates the dramatic increase in total NC deaths during 2020 and 2021, followed by a decline in 2022 through 2024:

	Deaths	% Change	Hospice Deaths	% Change	Deaths Served By Hospice	% Change
2017	93,202		41,685		44.7%	
2018	94,005	0.9%	42,352	1.6%	45.1%	0.7%
2019	94,686	0.7%	44,556	5.2%	47.1%	4.4%
2020	108,398	14.5%	46,982	5.4%	43.3%	-7.9%
2021	118,040	8.9%	49,660	5.7%	42.1%	-2.9%
2022	112,906	-4.3%	50,148	1.0%	44.4%	5.6%
2023	107,820	-4.5%	50,585	0.9%	46.9%	5.6%
2024	103,054	-4.4%	52,891	4.6%	51.3%	9.4%

Source: 2019 SMFP-2025 SMFP, Proposed 2026 SMFP

While hospice deaths have returned to a normal pre-COVID growth rate, the overall number of total deaths has declined. This creates an artificial projection of need when growth rates are extrapolated into the future.

Please know we at TCN fully support the Certificate of Need (CON) process and methodology in North Carolina. We also agree with our colleagues at the Association for Home & Hospice Care (AHHC) it is time to re-evaluate the CON methodology to ensure it is refreshed and ready for the future. And as you journey through assessing the preliminary 2026 SMFP and the projected needs shown, we respectfully ask that you consider and keep in mind this statistical anomaly caused by COVID-19 when reviewing county-specific petitions.

Should you require any additional information, please feel free to contact us at +1 (828) 329-0715 or via email at ccomeaux@teleioscn.org.

Sincerely,

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