



TRELLIS

Supportive Care

Palliative • Hospice • Family Support

August 9, 2023

State Health Coordinating Council
2704 Mail Service Center
Raleigh, North Carolina. 27699-2704
DHSR.SMFP.Petitions-Comments@dhhs.nc.gov

Submitted electronically

Dear State Health Coordinating Council Members and State Health Planning Staff:

Thank you for the opportunity to provide comments to the State Health Coordinating Council in reference to the petition for an adjusted need determination for one additional hospice home care agency in Mecklenburg County submitted by Heart and Soul Hospice of the Carolinas, LLC.

Trellis Supportive Care opposes this petition. The standard need methodology of the State Health Coordinating Council ensures that there are a sufficient number of hospice agencies in all 100 counties of North Carolina, including Mecklenburg County, and that these hospices can provide quality, cost-effective care. The petition requests an additional need determination in Mecklenburg County for a home hospice agency, however it does not demonstrate that the State Health Coordinating Council's methodology is flawed or fails to provide sufficient access to hospice care. Mecklenburg County is currently served by over 20 hospice agencies, and likewise hospice patient service in the county has risen yearly.

The petition specifically seeks to create an adjusted need determination of one hospice home care agency in Mecklenburg County focused on serving historically underserved racial and ethnic minority populations. The data presented to support this request represents a new untested methodology that may not accurately quantify need in accordance with the principles of CON. Further there is no outcomes data to support the assumption that the proposed additional hospice provider or the applicant's model of care would achieve the goal of improved utilization of hospice care for any specific population.

Hospice agencies across North Carolina, and the country, are engaged in efforts to increase hospice utilization among historically underserved populations. These efforts are supported by voluntary accreditation standards and the Medicare program's focus on equity in access to care. Populations that utilize hospice care at a lower level frequently have experienced inequitable access to healthcare before needing end of life care, and this experience can understandably influence patient choices when facing advanced illness. It is important to improve access to all forms of healthcare for all persons, however the addition of a hospice provider in Mecklenburg County would not ensure either increased utilization or quality of care for underserved populations. The proposed addition would also not ensure that only underserved populations would be served by the agency that received it.

Under the current methodology for assessing hospice need, North Carolina providers demonstrate a high level of quality care and overall perform above the national averages as listed on the CMS website Care Compare ([CMS Care Compare North Carolina Hospices](#)). The petitioner's agency in Tennessee has only been Medicare certified since 6/20/2021 and has no publicly reportable quality data available to assess whether the model meets the stated goals or provides quality care to the patients served ([Care Compare - Heart and Soul Hospice LLC](#)).

The petition references a lack of diversity of current hospice providers in Mecklenburg County, however many hospice providers in North Carolina are formed as non-profit organizations or are otherwise without a specifically identified owner. This is true of many of the hospices who cared for patients in Mecklenburg County according to the most recently available data. The medical providers, clinical staff and leadership of these existing agencies may reflect diverse populations and are not addressed in the petition. There may also be a question as to whether the Certificate of Need law allows the North Carolina Department of Health Service Regulation to consider the race of any new institutional health service's owner or operator in reviewing applications, which may lead to a question whether the petitioner, or any other minority owned hospice provider, would be awarded the proposed additional Certificate of Need. As a result, an incremental hospice provider might have no direct impact on increasing utilization of hospice care for populations that have historically experienced inequitable access to healthcare.

In closing, Trellis Supportive Care is opposed to an adjusted need determination for a hospice home care agency in Mecklenburg County, and respectfully requests that this petition be denied.

Thank you for your consideration,

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