



August 8, 2017

State Health Coordinating Council
2704 Mail Service Center
Raleigh, NC 27699-2704

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

Thank you for the opportunity to comment to the State Health Coordinating Council in reference to the petition for a Hospice Home Care Office in Mecklenburg County submitted by Continuum Care Hospice out of California. The Association for Home & Hospice Care of NC (AHHC) **opposes** this petition and believes that Mecklenburg County is adequately serving the African American community by several Hospice agencies in that county. Mecklenburg County is served by Hospice & Palliative Care Charlotte Region, which has three offices and two hospice inpatient units in the county, in addition to Novant Health Hospice & Palliative Care. Mecklenburg County is also served by Hospice of Iredell County, Hospice & Palliative Care Cabarrus County, Gaston Hospice and Hospice of Union County and others, who are providers in contiguous counties. The data supports that Mecklenburg County is the exact opposite of what the petition states in that African Americans are underserved in this county. The major urban counties in NC such as Mecklenburg, as a percentage, has fewer white admissions yet more non-white and African American admissions as referenced by the chart below.

As stated in the petition, nationally in 2014, only 7.6% of hospice patients were African American. Based upon the most recently published North Carolina hospice data, 13.55% of hospice admissions were African American. However, the most recent aggregated Mecklenburg licensure data shows hospice admissions at 20.96%, a rate 54.7% higher than the state average. We believe this data conclusively refutes the claim of Continuum Care Hospice that Mecklenburg County has a greater disparity in service to the African American community than any other county in North Carolina.

It is important to note that North Carolina does not currently collect county specific admission or death data by race. While race data might be a valuable addition to future licensure data collection, adequate data does not currently exist to establish a need determination for hospice homecare services in a specific geographic service area based on race.

In summary, AHHC believes this petition is unnecessary. All Hospice agencies in North Carolina market to anyone who needs their service regardless of race, gender or ethnicity. AHHC feels that these agencies currently do a great job in getting the services to the right recipients at the right time when individual families come to the conclusion that Hospice is right for them. We do hope to meet the petitioners in the near future to talk about their petition and what we can do to understand their position going forward. We also encourage Continuum Care Hospice to apply for a Hospice Home Care agency whenever the methodology shows a need in NC.

Thank you for your consideration.

Cordially,

A handwritten signature in black ink that reads "Tim Rogers". The signature is written in a cursive, flowing style.

Timothy Rogers
President & CEO

NC Most populated counties - Hospice Admissions by Race

2015

Facility County	AmericanIndian	Asian	AfricanAmerican	Hawaiian	White	Other	Total	NonWhite	%White	%NonWhite	%AfricanAmerican
Forsyth	0	5	316	0	1195	76	1592	397	75.06%	24.94%	19.85%
Guilford	4	21	449	0	1708	33	2215	507	77.11%	22.89%	20.27%
Mecklenburg	4	42	801	1	2684	129	3661	977	73.31%	26.69%	21.88%
Wake	4	36	563	0	2339	126	3068	729	76.24%	23.76%	18.35%

2016

Facility County	AmericanIndian	Asian	AfricanAmerican	Hawaiian	White	Other	Total	Non_White	%White	%Non-White	%AfricanAmerican
Forsyth	2	5	244	1	1,172	69	1,493	321	78.50%	21.50%	16.34%
Guilford	6	20	456	-	1,733	38	2,253	520	76.92%	23.08%	20.24%
Mecklenburg	6	26	794	1	2,724	237	3,788	1,064	71.91%	28.09%	20.96%
Wake	5	49	632	3	2,615	118	3,422	807	76.42%	23.58%	18.47%