

**From:** [Tina Pell](#)  
**To:** [DHSR.SMFP.Petitions-Comments](#)  
**Subject:** [External] Mecklenburg County Hospice CON request - HeartNSoul Hospice  
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Good Afternoon,

Please note our concerns regarding the request of an additional Hospice CON in Mecklenburg County. As a member of the Association for Home and Hospice Care of North Carolina, we have the following concerns:

- We support continued efforts to improve health equity for all North Carolinians, including hospice patients
- North Carolina licensed hospices are engaged in initiatives to increase hospice utilization among historically underserved populations, including African Americans
- These initiatives are required as part of all hospices' accreditation and Medicare certification
- The underutilization of hospice by African Americans is a complex and national problem—it is in no way unique to Mecklenburg County or even North Carolina
- Mecklenburg County is currently serviced by at least 24 licensed hospice home care agencies, all of which serve African Americans and have specific initiatives to increase access or promote health equity
- The standard need methodology ensures a sufficient number of hospices in Mecklenburg County and all 100 North Carolina counties and ensures that these hospices can provide quality, cost-effective care
- The petition requests an additional need determination in Mecklenburg County without demonstrating that the methodology is flawed or fails to provide sufficient access to hospice
- The petition is entirely premised on the notion that a hospice "owned and operated" by a subpopulation could better serve that subpopulation
- The petition fails to provide any support for this premise—the petitioner's limited experience in other states does not provide such evidence
- This premise harkens back to an illegal, segregated health care system
- If the petition were approved, it would provide no assurance that the petitioner or any other minority-owned hospice would receive the Certificate of Need
- The CON law does not permit the Department to consider the race of any new institutional health service's owner or operator
- We respectfully request this petition be denied in the same way that a similar petition was denied in 2017

Thank you for your consideration in this matter.

Tina Pell

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