

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 Heart’N Soul, dba HNS of the Carolinas. Caldwell Hospice and Palliative Care, Inc. DBA AMOREM **opposes** this petition and believes that Mecklenburg County is adequately serving the African American community and other minority communities in the county.

Mecklenburg County is currently served by twenty licensed Hospice organizations and per the charts below, the death service ratio for the African American population in Mecklenburg County is higher than the state average.

DEATH SERVICE RATIO in Mecklenburg County, NC							
Year	ALL	BLACK	HISPANIC	ASIAN	WHITE	GAP	% GAP
2017	54.4	42.6	51.4	44.1	59.9	17.3	29%
2018	56.5	44.5	49.0	42.1	62.6	18.1	29%
2019	53.5	44.2	45.8	41.0	58.5	14.3	24%
2020	53.1	43.1	27.9	37.8	59.0	15.9	27%
2021	52.6	41.9	31.4	37.9	59.2	17.3	29%
2022	52.7	43.6	41.7	34.1	59.4	15.8	27%

DEATH SERVICE RATIO in North Carolina							
Year	ALL	BLACK	HISPANIC	ASIAN	WHITE	GAP	% GAP
2017	49.2	38.3	44.3	44.5	52.0	13.7	26%
2018	49.2	38.2	39.0	41.1	52.1	13.9	27%
2019	50.5	40.1	42.2	39.6	53.3	13.2	25%
2020	47.9	37.0	29.2	39.2	51.1	14.1	28%
2021	46.8	36.0	31.5	38.3	50.0	14.0	28%
2022	48.4	37.5	38.5	35.7	51.6	14.1	27%

While we respect the petition wanting to put forth the concept of reaching minority populations, we do not believe this petition is necessary as there are already many high-quality licensed hospices working on this challenge and showing progress as evidenced by the data above. Minority populations are underserved nationwide thus signifying there are no quick-fix solutions. The best solution is a long-term commitment to these communities and building trust by providing great care. The current CON process for North Carolina works and we do not support an unsubstantiated approach to circumvent that process by using underserved communities as an angle to gain market access to all of North Carolina.

The petitioner has not proven in other states that their claims of doing a better job of reaching minority populations have worked. As you can see below in these charts, Tennessee has a lower death service ratio than North Carolina and the death service ratio in Davidson County, TN, where Heart’N Soul made a similar petition actually got worse not better again signifying how hard it is to build trust and care models that make progress in reaching these communities.

States with Low Death Service Ratios							
	ALL	BLACK	HISPANIC	ASIAN	WHITE	GAP	% GAP
New Jersey	43.9	29.2	31.3	27.3	47.7	18.5	39%
California	43.8	30.6	31.7	33.4	48.3	17.7	37%
Washington	41.3	27.1	29.9	34	42.2	15.1	36%
District of Colum	27.2	22.1	21.3	25.0	44.0	21.9	50%
New York	26.3	16.2	21	21.7	28.8	12.6	44%
Michigan	48.7	32.7	37.0	38.5	52.6	19.9	38%
Tennessee	45.9	34.4	31.7	43.4	47.9	13.5	28%

Death Service Ratio in Davidson County TN							
	ALL	BLACK	HISPANIC	ASIAN	WHITE	GAP	% GAP
2017	48.8	41.4	66.7	31.4	51.2	9.8	19%
2018	49.3	40.6	43.8	45.9	52.2	11.6	22%
2019	48.4	38.4	36.4	25	52.1	13.7	26%
2020	49.2	37.5	40	48.7	53.7	16.2	30%
2021	46.4	35.8	19.2	22.9	50.9	15.1	30%
2022	49.7	36.6	30	45.5	53.8	17.2	32%

In summary, AMOREM believes this petition is unnecessary. All Hospice agencies in North Carolina market to anyone who needs their service regardless of race, gender or ethnicity. AMOREM believes that numerous organizations currently serving Mecklenburg County are doing a great job and improving access to hospice services by getting the right care to the right recipients at the right time.

Thank you for your consideration.

Sincerely,



April L. Moore
Vice President of Business Services



960 North First Street
 Albemarle NC 28001
 Office 704-983-4216
 Fax 704-983-6662
 Toll Free 800-230-4236
 hospiceofstanly.org

August 9, 2023

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 Heart 'N Soul, dba HNS of the Carolinas. Hospice of Stanly County, Inc. **opposes** this petition and believes that Mecklenburg County is adequately serving the African American community and other minority communities in the county.

Mecklenburg County is currently served by 20 licensed Hospice organizations. As shown below, the death service ratio for the African American population in Mecklenburg County is better than the state average, as is the death service ratio for Stanly County, a neighboring county.

DEATH SERVICE RATIO in Mecklenburg County, NC							
Year	ALL	BLACK	HISPANIC	ASIAN	WHITE	GAP	% GAP
2017	54.4	42.6	51.4	44.1	59.9	17.3	29%
2018	56.5	44.5	49.0	42.1	62.6	18.1	29%
2019	53.5	44.2	45.8	41.0	58.5	14.3	24%
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While we respect the petition wanting to put forth the concept of reaching minority populations, we do not believe this petition is necessary as there are already many high-quality licensed hospices working on this challenge and showing progress as evidenced by the data above. Minority populations are underserved nationwide thus signifying there are no quick fix solutions but rather the best solution is a long-term commitment to these communities that includes building trust and providing great care. The current CON process for North Carolina works, and we do not support an unsubstantiated approach to circumvent that process by using underserved communities as an angle to gain market access to all of North Carolina.

In summary, Hospice of Stanly County, Inc. believes this petition is unnecessary. All Hospice agencies in North Carolina market to anyone who needs their service regardless of race, gender, or ethnicity. Hospice of Stanly County, Inc. believes that numerous organizations currently serving Mecklenburg are doing a great job in improving getting the services to the right recipients at the right time when individual families conclude that Hospice is right for them.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink that reads "Lori S. Thayer".

Lori S. Thayer, RHIA, CLE
Chief Executive Officer

North Carolina Division of Health Service Regulation Healthcare Planning
 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 Heart 'N Soul, dba HNS of the Carolinas. Carolina Caring **opposes** this petition and believes that Mecklenburg County is adequately serving the African American community and other minority communities in the county.

Mecklenburg County is currently served by **over** 20 licensed Hospice organizations all of which have specific initiatives to increase access or promote health equity. Per the below, the death service ratio for the African American and Hispanic population in Mecklenburg County are better than the state average.

DEATH SERVICE RATIO in Mecklenburg County, NC							
Year	ALL	BLACK	HISPANIC	ASIAN	WHITE	GAP	% GAP
2017	54.4	42.6	51.4	44.1	59.9	17.3	29%
2018	56.5	44.5	49.0	42.1	62.6	18.1	29%
2019	53.5	44.2	45.8	41.0	58.5	14.3	24%
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While we agree that improvement is needed so no one goes without high quality, end-of-life care, our organization is working diligently for this to be the case and we believe through our efforts that improvement has been made.

As you can see in the following chart, the number of African American deaths in Mecklenburg County served with hospice has increased. Carolina Caring provides hospice services in Mecklenburg County and 32% of our census in this county is minority patients. This is just one indicator of our commitment to deliver culturally competent care and our ongoing efforts building trusted relationships in underserved communities.

Carolina Caring provides these services wherever the patient calls home, understanding the value of patients being in a space that is comfortable and familiar, surrounded by the people who love them.

Mecklenburg County, NC										
Year	Medicare Enrollment	Black Medicare Entollment in County	Death Rate per 1,000	Increase in Death Rate per 1,000 during COVID	Resident Deaths	Black Deaths	Increase in Black Deaths due to COVID	Black Death Service Ratio	Black Hospice Deaths Observed	Increase in Black Hospice Deaths due to COVID
2017	142,565	42,478	34.3		4,891	1,614		0.426	688	
2018	147,848	44,342	35.2		5,207	1,718		0.445	765	
2019	152,547	46,068	34.6		5,276	1,741		0.442	770	
2020	156,484	47,513	38.6	3.9	6,046	1,995	187	0.431	860	81
2021	160,785	49,140	38.4	3.7	6,171	2,036	181	0.419	853	76
2022	165,070	50,571	36.7	2.0	6,051	1,997	99	0.436	871	43
Average Death Rate per 1000 from 2017 - 2019 = 34.7										

Carolina Caring engages with community partners throughout Mecklenburg County to reach these historically underserved communities. This outreach effort affords us the opportunity to educate on hospice services and have meaningful conversations to understand what is important to them. This underscores our commitment to honoring cultural beliefs and values while providing responsive healthcare in communities with the greatest needs.

Carolina Caring recognizes that this is vital work and that it takes time to do it in the right way. Carolina Caring also understands that fostering authentic relationships with key leaders in these communities will create trust and elevate the quality and timely accessibility of hospice care for all.

Additionally, Carolina Caring offers a palliative medicine program that provides care in the home setting for individuals with serious/chronic illness. Carolina Caring understands that vulnerable populations are at a greater risk for developing certain serious or chronic conditions; and early involvement can have distinct benefits. Providing this program in Mecklenburg County further demonstrates our reach into these minority communities as a trusted resource.

While we respect the petition wanting to put forth the concept of improvement in reaching minority populations, we do not believe this petition is necessary as our work is showing progress. Furthermore, the petition fails to adequately demonstrate *how* the percentage of minority deaths served by hospice would increase. Minority populations are underserved nationwide thus signifying that there are no quick fix solutions, but rather the best solution is a long-term commitment to these communities and building trust and providing great care. This is what Carolina Caring has been and will continue to be committed to.

The petition is entirely based on the notion that a hospice “owned and operated” by a minority could better serve an underserved population. The petition fails to provide any support for this premise. The petitioner has not proven in other states that their claims of doing a better job of reaching minority populations has actually worked. As you can see below in these charts, Tennessee is worse than North Carolina and Davidson County, where Heart 'N Soul made a similar petition got worse, not better.

Again, this signifies how hard it is to build trust and deliver care models that make progress in reaching these communities. Carolina Caring is committed to continuing that hard work and we expect to see the deaths served continue to rise and allowing more programs into this community will only detract from that great work being furthered.

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In summary, Carolina Caring believes this petition is unnecessary. All Hospice agencies in North Carolina market to anyone who needs their service regardless of race, gender, or ethnicity. Carolina Caring believes that the numerous organizations currently serving Mecklenburg are doing a great job in improving access of services and getting these services to the right recipients at the right time when individual families conclude that Hospice is right for them. Carolina Caring is committed to continuing this hard, but important, work of reaching these underserved communities.

Thank you for your consideration.

Sincerely,



Dana C. Killian
 President & CEO
 Carolina Caring