



NHPCO

National Hospice and Palliative
Care Organization

March 6, 2020

Seema Verma

Administrator

Centers for Medicare and Medicaid Services

200 Independence Avenue, SW

Washington, D.C. 20101

Dear Administrator Verma,

On behalf of the National Hospice and Palliative Care Organization (NHPCO), I would like to thank you for your leadership on the COVID-19 Task Force and for your collaboration with the hospice and palliative care community on Wednesday, March 4 at the White House. I appreciated the opportunity to help inform the Administration's Coronavirus preparedness efforts on behalf of hospice and palliative care providers and look forward to continued dialogue with you, the Vice President, and Ambassador Birx on the development of guidance that will help meet the needs of the hospice and palliative care providers offering community-based care to vulnerable Americans across the nation.

NHPCO is the largest membership organization representing the entire spectrum of not-for-profit and for-profit hospice and palliative care programs and professionals in the United States. Comprised of over 4,000 hospice locations with more than 57,000 hospice staff and volunteers, as well as 46 state organizations.

Our provider community has informed us of a variety of issues that hospice and palliative care providers are facing as the COVID-19 outbreak becomes more widespread.

Providers have also offered the following recommendations as potential remediations for these issues.

Access

Hospice providers have reported facing difficulty accessing to patients who are enrolled in hospice care who reside in nursing homes and other facilities when the facility has identified a case of COVID-19.

Recommendation: CMS should issue guidance in the form of a memo allowing outside providers, such as a hospice provider, to have access to their patients in the facility if they follow the facility's requirements for screening entrants.

Hospice providers could then use utilize a copy of the memo to gain entrance to



the facility. The hospice provider should also be following their infection control policy, including utilization of personal protective equipment while in the facility and caring for their patient. Additionally, it is imperative that the requirements regarding implementation of a hospice patient's plan of care be relaxed (i.e. scope and frequency of visits).

Supplies & Testing

Hospice and palliative care providers are having trouble accessing personal protective equipment (PPE) due to the worldwide shortage related to decreases in exports from select countries and increases in demand. This is an enhanced issue for our provider community because so much of our care is provided in a patient's home.

Recommendation: CMS needs to provide guidance regarding associated procedures and processes that hospice providers can follow to gain access to the anticipated increase in PPE that will become available with increased funding. Provider PPE needs include the following: isolation gowns, masks (including n95 respirators and surgical masks), face shields and goggles, and medical grade gloves.

Telehealth

Increased telehealth visits would allow hospice providers to be in close communication with patients and their family while controlling potential transmission of disease.

Recommendation: CMS should issue guidance relaxing any restrictions on the use of telehealth to facilitate safe access for uninterrupted hospice care to a patient in a facility or home particularly when fulfilling routine requirements such as a face-to-face visit. NHPCO is supportive of the CONNECT for Health Act of 2019, the proposed legislation to waive telehealth restrictions when necessary and to remove geographic and originating site restrictions for services like mental health and emergency medical care.

Additional Recommendations

Recommendation: NHPCO requests to work directly with the administration in creating guidance that will reflect the unique needs and abilities of home-based health care providers, including hospices, to ensure healthcare and patient safety.

Recommendation: Should the President declare a disaster or emergency under the Stafford Act or National Emergencies Act, NHPCO requests that hospice be an included provider in 1135 blanket waiver that is issued.



NHPCO

National Hospice and Palliative
Care Organization

We appreciate your leadership and the opportunity to follow up on our discussions with written recommendations. Hospice and palliative care providers stand ready to continue to offer expert advice on how to support to patients and families in the community. Your adoption of these recommendations will allow hospice and palliative care providers to continue to provide uninterrupted care while promoting safety and health for all Americans.

We look forward to discussing these recommendations with you and your staff. Feel free to have your staff contact Annie Acs, NHPCO Director of Health Policy & Innovation at aacs@nhpco.org or Judi Lund Person, Vice President of Regulatory and Compliance at jlundperson@nhpco.org if you have questions or would like to arrange a meeting.

Sincerely,

Edo Banach, President & CEO
NHPCO