

March 27, 2020

Christopher C. Krebs  
Director  
Cybersecurity and Infrastructure Security Agency (CISA)

Comments submitted via [CISA.CAT@cisa.dhs.gov](mailto:CISA.CAT@cisa.dhs.gov)

Dear Director Krebs,

On behalf of the National Hospice and Palliative Care Organization (NHPCO), I would like to thank you for your leadership in coordinating the overall federal effort to ensure the security and resilience of the Nation's critical infrastructure.

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.

Hospice Providers are front line healthcare workers who often provide care in the home and are increasingly being exposed to the COVID-19 disease. 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. Across the country, health care workers on the frontlines of the escalating fight against COVID-19, the disease caused by the novel coronavirus, describe a grim scene of rationed with some providers labeling the situation as frontlines feel like 'lambs to the slaughterhouse'. This is an enhanced issue for our provider community because so much of our care is provided in a patient's home.

We applaud CISA for creating a list to assist State, local, tribal and territorial governments in prioritizing activities related to continuity of operations and incident response, including the appropriate movement of critical infrastructure workers within and between jurisdictions. Furthermore, we are pleased that hospices are on the list of medical services because our provider community provides critical care to patients at the end of life, most often in the community. However, the challenge is in the language used here:

*We recognize that State, local, tribal, and territorial governments are ultimately in charge of implementing and executing response activities in communities under their jurisdiction, while the Federal Government is in a supporting role. As State and local communities consider COVID-19-related restrictions, CISA is offering this list to assist*

*prioritizing activities related to continuity of operations and incident response, including the appropriate movement of critical infrastructure workers within and between jurisdictions. **Accordingly, this list is advisory in nature.** It is not, nor should it be considered to be, a federal directive or standard in and of itself.*

The hospice and palliative care community is relying on the CISA list as one form of identification for hospice as critical infrastructure workers. We need this designation to be identified as **priority** for the distribution of PPE. Anything stronger that can be stated during this national emergency would be essential for many community-based providers to continue to care for vulnerable and very sick patients.

We would be very pleased to address any questions or concerns you may have and appreciate your consideration of this important request. Both Ms. Judi Lund Person, Vice President of Regulatory and Compliance at [jlundperson@nhpco.org](mailto:jlundperson@nhpco.org) and Ms. Annie Acs, Director of Health Policy and Innovation at [aacs@nhpco.org](mailto:aacs@nhpco.org) are available if you have questions or would like to arrange a meeting.

Thank you for your service and consideration.

Sincerely,

A handwritten signature in black ink, appearing to read 'Edo Banach', written in a cursive style.

Edo Banach  
President & CEO