



1731 King Street
Alexandria, VA 22314
nhpco.org

tel. 703.837.1500
fax. 703.837.1233

July 27, 2020

Alex M. Azar
Secretary
US Department of Health and Human Services
200 Independence Avenue, SW
Washington, D.C. 20101

Seema Verma
Administrator
Centers for Medicare and Medicaid Services
U.S. Department of Health and Human Services
200 Independence Avenue, SW
Washington, D.C. 20101

RE: Dedicated Provider Relief Funding for COVID-19 Testing

Dear Secretary Azar and Administrator Verma:

On behalf of the National Hospice and Palliative Care Organization (NHPCO), I thank you for your continued leadership in keeping Americans safe and supporting our health care providers as we face the coronavirus pandemic together. NHPCO is the largest membership organization representing the entire spectrum of hospice and palliative care programs and professionals in the United States. NHPCO is comprised of almost 4,000 hospice locations with more than 57,000 hospice staff and volunteers, as well as 46 state hospice and palliative care organizations. We appreciate your ongoing collaboration with the hospice and palliative care community in responding to the COVID-19 public health emergency.

We are grateful to the Administration for providing the hospice and palliative care community resources and flexibilities that have enabled hospices to provide high quality care to their patients and families during this time of uncertainty. However, with COVID-19 infection rates increasing and new testing mandates being imposed at the state and federal level, providers are experiencing a significant funding gap in payment for testing for their frontline hospice workers. Hospices provide care to patients wherever they reside. According to the latest data available, 48.2% of patients received hospice care in

their home, 31.8% in nursing facilities and assisted living, 11.2% in inpatient hospice facilities, 7% in acute care hospitals, and 1.7% in other settings.¹

COVID-19 testing of frontline hospice workers is essential. There is equal risk of nursing home and hospice staff to contracting COVID-19 through community spread. Identifying COVID-19 positive care delivery professionals would assist in protecting vulnerable hospice patients, their families, and other nursing home and skilled nursing facility residents from life-threatening COVID-19 outbreaks.

In June 2020, approximately 40% of those who responded to an NHPCO survey of hospice providers reported serving patients in COVID-19 hot spots, and approximately 75% of respondents reported having treated patients who are presumed to be positive for COVID-19. Hospices directly impacted by COVID-19 exposure need support to keep patients and their families and other health care providers staffs safe.

In order to efficiently test staff, and meet state and nursing home requirements, hospices would need \$500 million² in dedicated funding aimed at covering COVID-19 tests for hospice staff working in patients' homes, nursing homes, facilities and assisted living facilities.

In addition to the individual test kits, hospice providers require assistance in accessing coronavirus test machines. On July 14, 2020 HHS announced³ a large-scale procurement of FDA-authorized rapid point-of-care diagnostic test instruments and tests to be distributed to nursing homes in COVID-19 hotspot geographic areas with the United States. We urge you to include hospice providers in this initiative, enabling the one-time procurement of devices and tests targeted to facilitate on-site testing among hospice patients and staff. This would enable hospice providers to augment their current capacity for COVID-19 testing, bolstering their ability to prevent reduce community spread of COVID-19.

We thank you for your consideration and look forward to continued collaboration with the Administration to strengthen the US health care system and to serve patients and families during this public health emergency.

Sincerely,



Edo Banach
President & CEO

¹ https://www.nhpc.org/wp-content/uploads/2019/07/2018_NHPCO_Facts_Figures.pdf

² 28,500 employees for weekly testing and three tests for 1.1 million family members/visitors at \$150 per test

³ <https://www.hhs.gov/about/news/2020/07/14/trump-administration-announces-initiative-more-faster-covid-19-testing-nursing-homes.html>