

Hospice Action Network (HAN) is the advocacy affiliate of the National Hospice and Palliative Care Organization (NHPCO). NHPCO is the nation's largest and oldest membership association for providers who care for people affected by serious and life-limiting illness. NHPCO represents over 4,000 hospice locations with thousands of hospice staff and volunteers, and 42 state hospice and palliative care organizations representing 44 states.

HAN is working with provider members, state organizations, other national healthcare organizations, and relevant stakeholders to advance the NHPCO legislative and regulatory agenda. As hospice advocates, we urge Congress and the Administration to support policies that promote equitable access to high-quality hospice and palliative care for patients and families in need across our communities and support policies that improve healthcare delivery.

Protect Care for Patients and Families

- Program Integrity: Ensure appropriate oversight and regulation to protect access to high-quality hospice care for patients and families via additional oversight of new and suspicious hospices to prevent bad actors from operating.
- Special Focus Program: Improve the hospice Special Focus Program (SFP) to ensure proper identification of poor-performing hospices. Advocate for reforms to the SFP which would require delivery of technical assistance to raise the quality of care delivered to beneficiaries.
- Telehealth Flexibilities: Extend, or make permanent, flexibilities issued through legislation and regulatory waivers which would enable hospice and palliative care providers to offer needed care to more Americans facing serious or life-limiting illness wherever they call home. These flexibilities would allow for increased access to care in rural and high-traffic urban areas as well.
- **Bereavement Services:** Expand coverage of bereavement services offered by hospice providers that care for grieving communities in the face of natural disasters and other mass casualty incidents.
- Veterans Care: Ensure our nation's heroes have access to serious-illness and end-of-life care specific to their unique needs and protect access to their burial and funeral benefit, earned in service to their country.

Make Meaningful Benefit Improvements to Increase Access and Advance Health Equity

- Workforce Crisis: Address the workforce crisis providers are facing by allowing practitioners to perform at the top of their licensure plus, secure the workforce of tomorrow by increasing diverse healthcare professionals with expertise in palliative and hospice care.
- Eligibility: Reform the outdated six-month prognosis barrier and tie hospice eligibility to need, not an arbitrary time limit.
- Concurrent Care: Avoid having patients in need of hospice care make "the terrible choice" between continuing disease specific therapies like dialysis and accessing person-centered, interdisciplinary care services offered by hospice providers.
- **Equity and Inclusion:** Advance health equity by removing structural barriers to high-quality hospice and community-based palliative care and building trust by offering education and culturally appropriate outreach and resources to improve communication and increase transparency.



Innovation In Serious Illness Care Delivery and Payment

- Community-Based Palliative Care Benefit: Build upon the Centers for Medicare and Medicaid Services (CMS) Innovation Center's (CMMI) Medicare Care Choices Model (MCCM) which improved quality and produced cost savings when testing concurrent care in hospice. Determine the scope of minimum required services that define "community-based palliative care" which is offered by an interdisciplinary team and have CMS adopt the defined services. Improve care delivery across the care continuum by covering needed community-based palliative care further upstream from hospice.
- MA VBID Hospice Carve-In Sunsetting: Ensure a seamless ending to the hospice component of the CMMI Medicare Advantage Value-Based Insurance Design (VBID) model through support for providers and comprehensive evaluation reports including quality measures, utilization of services, and costs.

Protect Access and Ensure Quality

- Financing: Ensure hospice providers can offer the right care at the right time by securing a level of reimbursement for services which guarantee that every American facing serious or life-limiting illness has access to the high-quality hospice and palliative care they deserve.
- Quality Improvement: Position NHPCO's Quality Connections program as the gold standard for providers offering the high-quality care that all Americans facing serious and life-limiting illness deserve.
- OIG Engagement: Serve as the main resource for the US Department of Health and Human Services (HHS) Office of Inspector General by leading a national coalition to engage on issues related to hospice program audits, inspections, and evaluations.
- Red Tape Reduction: Ensure resources are going directly to patient care by eliminating overly burdensome regulations which jeopardize access, while strengthening program integrity measures that promote highquality care.

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