

September 23, 2020

Leader Mitch McConnell  
Majority Leader, US Senate  
317 Russell Senate Office Building

Speaker Nancy Pelosi  
Speaker of the US House of Representatives  
1236 Longworth House Office Building  
Washington, DC 20515

**RE: Community-Based Palliative Care Demonstration Model**

Dear Leader McConnell and Speaker Pelosi:

On behalf of the National Hospice and Palliative Care Organization (NHPCO), and the National Coalition for Hospice and Palliative Care, we thank you for your continued leadership in keeping Americans safe and supporting our health care providers as we face the coronavirus pandemic together. We appreciate your ongoing collaboration with the hospice and palliative care community in responding to the COVID-19 public health emergency.

Together with the undersigned organizations, we respectfully request your support for testing a new health care payment and delivery model that would improve access to community-based palliative care for patients and families facing serious illness. Specifically, we have urged Secretary of Health and Human Services Alex Azar to develop and implement a community-based palliative care demonstration through the Centers for Medicare & Medicaid Services Center for Medicare & Medicaid Innovation (CMMI).

There is a significant evidence base to support the need for a CMMI supported community-based palliative care effort that would lead to improved quality and cost outcomes for beneficiaries experiencing serious illness. In fact, a 2017 study in the *Journal of Palliative Medicine* found that the impact of a community-based palliative care program implemented within an Accountable Care Organization (ACO) “was associated with significant cost savings, fewer hospitalizations, and increased hospice use in the final months of life.”<sup>1</sup> Additionally, a community-based palliative care demonstration would enable access to a specially-trained interdisciplinary clinical team providing relief from symptom distress while the patient continues to pursue curative treatment. This is especially important for seriously ill patients with comorbidities who are battling conditions such as COVID-19.

The most feasible and expeditious way to test the impact of a national community-based palliative care benefit is by launching a community-based palliative care demonstration through CMMI, either by adding to an existing model or by creating a new one. We believe such a demonstration would:

- improve the quality of care for at-risk individuals;
- protect high-risk individuals from unnecessary exposure to COVID-19 and other dangers;

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<sup>1</sup> Dana Lustbader, Mitchell Mudra, Carole Romano, Ed Lukoski, Andy Chang, James Mittelberger, Terry Scherr, and David Cooper. The Impact of a Home-Based Palliative Care Program in an Accountable Care Organization. *Journal of Palliative Medicine*. Jan 2017.23-28.  
<http://doi.org/10.1089/jpm.2016.0265>

- reduce the occurrence of preventable hospitalizations and emergency department visits by appropriately managing distressing symptoms;
- utilize a limited workforce more effectively;
- enhance the use of telehealth – since community-based palliative models incorporate frequent visits with patients via telehealth – avoiding burdensome and risky trips to clinical care sites; and
- reduce total cost of care for this target population.

We feel confident that patients who receive community-based palliative care will have a marked improvement in quality of life, experience fewer avoidable emergency department visits and hospital admissions, and may even live longer.

We appreciate the opportunity to provide stakeholder input on a community-based palliative care demonstration and would welcome the opportunity to meet with you and your staff to discuss our recommendations. Thank you again for your leadership and for taking actions to support innovation in palliative care. If you have questions, please contact Mark Slobodien, NHPCO's Director of Legislative Affairs, at [mslobodien@nhpco.org](mailto:mslobodien@nhpco.org).

Sincerely,

National Hospice and Palliative Care Organization  
 National Coalition for Hospice and Palliative Care  
 (other supporting orgs listed here alphabetically)

**National Organizations**

The Alliance for the Advancement of End of Life Care  
 American Academy of Family Physicians  
 American Academy of Hospice and Palliative Medicine  
 American Cancer Society Cancer Action Network  
 Association of Professional Chaplains  
 Cambia Health Foundation  
 Cancer Support Community  
 Center to Advance Palliative Care  
 Children's National Hospital  
 Families USA  
 Health Care Chaplaincy Network  
 Home Care Association of America  
 Hospice and Palliative Nurses Association  
 The John A. Hartford Foundation  
 LeadingAge  
 Medicare Rights Center  
 Motion Picture & Television Fund  
 National Association of Home Care and Hospice (NAHC)  
 National Palliative Care Research Center  
 National Patient Advocate Foundation  
 National POLST  
 Oncology Nursing Society

Physician Assistants in Hospice and Palliative Medicine  
Respecting Choices  
Social Work Hospice and Palliative Care Network  
Society of Pain and Palliative Care Pharmacy  
Supportive Care Coalition (SCC)

**State Organizations**

Alabama Hospice and Palliative Care Organization  
The Alliance for the Advancement of End of Life Care (LA/MS)  
Association for Home & Hospice Care of North Carolina  
California Hospice and Palliative Care Association  
The Carolinas Center  
Coalition for Compassionate Care of California  
Connecticut Association for Healthcare at Home  
Florida Hospice and Palliative Care Association  
Granite State Home Health & Hospice Association (NH)  
Home Care & Hospice Association of NJ  
Homecare & Hospice Association of Utah  
Hospice & Palliative Care Association of Arkansas  
Hospice and Palliative Care Association of Iowa  
The Hospice and Palliative Care Association of New York State  
Hospice and Palliative Care Federation of Massachusetts (HPCFM)  
Hospice & Palliative Care Network of Maryland  
Hospice Council of West Virginia  
Idaho Health Care Association (IHCA)  
Illinois HomeCare & Hospice Council  
Illinois Hospice & Palliative Care Organization  
Indiana Association for Home and Hospice Care  
Kansas Hospice and Palliative Care Organization  
Kentucky Association of Hospice and Palliative Care  
Kokua Mau (Hawaii)  
Louisiana-Mississippi Hospice & Palliative Care Organization  
The Maine Hospice Council, Inc.  
Michigan HomeCare & Hospice Association  
Ohio Council for Home Care and Hospice  
Oregon Hospice & Palliative Care Association  
South Carolina Home Care & Hospice Association  
South Dakota Association of Healthcare Organizations  
Texas & New Mexico Hospice Organization  
Virginia Association for Home Care and Hospice  
Washington State Hospice & Palliative Care Organization