



Denise Schrader, RN MSN NEA-BC
Chairman of the Board

NATIONAL ASSOCIATION FOR HOME CARE & HOSPICE
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Val J. Halamandaris, JD
President

May 1, 2015

Representative Tom Reed
Representative Mike Thompson
U.S. House of Representatives
Washington, D.C.

Dear Representatives Reed and Thompson:

The National Association for Home Care & Hospice (NAHC) is the nation's largest association representing home health, home care, and hospice organizations. Our membership includes freestanding hospice organizations as well as hospices that are linked to home health agencies and to health systems. As such, we appreciate the opportunity to provide comment on your proposed legislation, H.R. 2208 -- the Hospice Commitment to Accurate and Relevant Encounters Act -- Hospice CARE.

The intent of the hospice face-to-face requirement is to ensure adequate and appropriate involvement of medical professionals in certification of ongoing eligibility for hospice care. However, as currently implemented, the requirement may delay access to care and serve as a deterrent for some hospices to take eligible patients in need of immediate care onto service. This was neither its intent nor an advisable result of the requirement. Your legislation addresses these concerns by allowing hospices to utilize clinical nurse specialists, physician assistants, or other health professionals as determined by the Secretary of Health and Human Services (in addition to physicians and nurse practitioners) to conduct the face-to-face encounter. Additionally, the Hospice CARE Act would permit hospices to conduct the face-to-face within seven days of the start of the applicable benefit period when exceptional circumstances are in play. These refinements to existing hospice face-to-face requirements are greatly needed, and will go a long way toward ensuring that patients will receive vital hospice services in a timely fashion. NAHC wholeheartedly endorses the Hospice CARE Act and your efforts in this regard.

We greatly appreciate your introduction of the Hospice CARE Act, and stand ready to assist you in any way that we can to help promote passage of this important legislation. We also commend your longstanding commitment to the hospice program and the patients and families it serves.

Sincerely,

A handwritten signature in black ink, reading "Val J. Halamandaris" with a long horizontal flourish extending to the right.

Val J. Halamandaris
President