



June 11, 2019

Honorable Ron Kind
Honorable Jackie Walorski
Honorable Adrian Smith
Honorable Ann M. Kuster
Honorable Chellie Pingree
Honorable Jack Bergman
Honorable Cynthia Axne
United States House of Representatives
Washington, D.C.

Dear Representatives Kind, Walorski, Smith, Kuster, Pingree, Bergman, and Axne:

The Forum of State Associations (Forum) is an affiliated organization of the National Association for Home Care & Hospice (NAHC). NAHC and members of the Forum advocate for legislative, regulatory and other changes that will help to improve the quality and availability of home care and hospice services throughout the nation. **NAHC and the undersigned Forum members are writing to express our enthusiastic support for H.R. 2594, the Rural Access to Hospice Act of 2019.**

When enacted in 1982, the legislation that authorized the Medicare Hospice Benefit recognized the right of hospice patients to maintain the involvement of their personal physician in their care as they entered the final stages of life. Today, Nurse Practitioners (NP) and Physician Assistants (PAs) often also fulfill the role as primary clinicians for many patients and families and are helping to provide continuity of care, support, and comfort for those transitioning to hospice services. As a result, Medicare allows a hospice patient's designated attending physician/NP/PA to bill Medicare for services related to the terminal illness or related conditions as long as the attending physician/NP/PA is not an "employee" of the hospice. This flexibility has brought great comfort and eased fears experienced by individuals as they and their loved ones address the realities of life-limiting illnesses.

However, through some oversight, the authorizing legislation did not address conditions under which a patient's personal physician/NP/PA is the employee of a Rural Health Clinic (RHC) or Federally-Qualified Health Center (FQHC). As a result, RHCs and FQHCs may NOT bill Medicare for hospice

attending physician/NP/PA services performed by their employees. This may discourage RHC and FQHC personnel from serving as attending physicians for hospice patients which may, in turn, discourage use of hospice services and deny Medicare beneficiaries and their caregivers the vital benefits that hospice has to offer.

The Rural Access to Hospice Act of 2019 would address this serious oversight and help to ensure that hospice patients served by RHCs and FQHCs are afforded the right to continuity of care that their counterparts in more populous areas of the country have enjoyed for more than 30 years. This legislation does so by permitting RHCs and FQHCs to bill Medicare for hospice attending physician services provided by center-employed physicians/NPs/PAs.

We endorse your efforts to promote the important changes that would occur through enactment of the Rural Access to Hospice Act of 2019 and extend our sincere thanks. Your efforts directly help to ensure Americans across the country are able to access quality hospice care services and live in the comfort of their homes with independence and dignity. We stand ready to assist in any way that we can to work toward enactment of **H.R.2594**. If you have any questions, please feel free to contact Theresa Forster (tmf@nahc.org) at the National Association for Home Care & Hospice (NAHC) at 202-547-7424.

Sincerely,

National Association for Home Care & Hospice
Home Care Association of Arkansas (AK)
Arizona Association for Home Care (AZ)
Arizona Hospice and Palliative Care Organization (AZ)
California Association for Health Services at Home (CAHSAH)
Connecticut Association for Healthcare at Home (CT)
Home Care Association of Florida (FL)
Georgia Association for Home Health Agencies (GA)
Illinois Home Care & Hospice Council (IL)
Indiana Association for Home and Hospice Care (IN)
Kansas Home Care & Hospice Association (KS)
Kentucky Home Care Association (KY)
Home Care & Hospice Alliance of Maine (ME)
Michigan Home Care & Hospice Association (MI)
Minnesota Home Care Association (MN)
Missouri Alliance for Home Care (MO)
Mississippi Association for Home Care (MS)
Nebraska Home Care Association (NE)
Association for Home & Hospice Care of North Carolina (NC)
Granite State Home Health and Hospice Association (NH)
Home Care & Hospice Association of New Jersey (NJ)
Home Care Association of New York State (HCA)
New York State Association of Healthcare Providers, Inc. (NY)
Ohio Council for Home Care and Hospice (OH)
Ohio Health Care Association (OH)

Oklahoma Association for Home Care and Hospice (OK)
Oregon Association for Home Care (OR)
Pennsylvania Home Care Association (PA)
South Carolina Home Care & Hospice Association (SC)
Tennessee Association for Home Care (TN)
Virginia Association for Home Care & Hospice (VA)
Wisconsin Association for Home Healthcare, Inc. (WI)
Home Care Association of Washington (WA)
West Virginia Council of Home Care Agencies (WV)