



July 12, 2024

The Honorable Earl Blumenauer
1111 Longworth House Office Building
Washington, DC 20515

RE: Hospice CARE Act

Dear Representative Blumenauer,

On behalf of the Hospice and Palliative Nurses Association (HPNA) and our nearly 8,000 members across the country, we write to thank you for your leadership and efforts to improve and modernize the practice of hospice and palliative care, and we appreciate this opportunity to comment on the Hospice CARE Act discussion draft.

HPNA is a national nonprofit organization of nursing professionals serving their communities in the specialty of hospice and palliative nursing across the lifespan. Established in 1986, HPNA is the only nursing organization of its kind. Our mission is to advance nursing expertise in hospice and palliative care through education, advocacy, leadership, and research, and our vision is for every person living with serious illness to receive equitable, comprehensive, and innovative hospice and palliative nursing care. HPNA's members are committed to providing the highest level of treatment and dignity to their patients and families, including at the end of life. We strongly support policy that strengthens oversight while also ensuring nurses can practice to the full extent of their training to improve patient care and alleviate strain on the healthcare workforce.

There are two areas within the draft legislation where HPNA has specific requests. First, where the draft language specifies "nurse practitioner," we request that the language be altered to "advanced practice registered nurses." This allows hospices the flexibility to hire from a larger pool of qualified healthcare practitioners. Although the issue is well known, it bears repeating that there are no easy or short-term fixes to increasing the number of nurses in the workforce, so it is critical that the legislation specify this broader category of nurses who have met advanced educational and clinical practice requirements.

Additionally, subsection (n) currently requires a face-to-face encounter by either a medical director or physician who is making a recertification request to occur within 10 days of a hospice recertification. The intent of this language is understandable, yet it would, in practice, prevent access to hospice care for qualified patients. Rural patients would find extended delays in recertification simply because of challenges that occur when there is significant distance between patient and provider. More pervasive, however, is the difficulty for patients seeking hospice care to travel, regardless of rural, suburban, or urban setting. Their fragile medical state often requires them to be reliant upon oxygen, other medical



equipment, and caregivers. The logistics of transportation, waiting rooms, and time away from home are more than exhausting. This negatively impacts their health—the opposite of caregiving.

We respectfully ask that the legislation allow telehealth to continue to serve as a tool for providers to recertify hospice patients. This capability has reduced wait times and clinician burden, allowing for more time to be spent on patient care. Most importantly, it can improve quality of life and comfort for these individuals—directly supporting the goals of hospice care.

As you continue your hard work on this important legislation, please do not hesitate to reach out to HPNA for additional feedback on possible policy solutions. Our members work directly with hospice patients every day and truly are the subject-matter experts who understand where laws and regulations overlap with patient care and outcomes.

Again, thank you for your commitment to improving the quality of hospice and palliative care and for understanding the important role it plays in the lives of patients and their families, as well as the unique challenges the healthcare workforce faces in providing end-of-life care. Please reach out to Sarah Potter, manager of advocacy and health policy, if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Lynn Reinke".

Lynn Reinke, PhD, ANP-BC, FAAN, FPCN, ATSF
2024 HPNA President

A handwritten signature in black ink that reads "Virginia A. Marshall".

Virginia (Ginger) Marshall, MSN, ACNP-BC, ACHPN®, FPCN
Chief Executive Officer, HPNA