



**Willamette
Vital Health**

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**A Written Testimony to the Senate Health Care Committee on April 1, 2025, at 3:00pm
SB 1162: In Support of a Hospice Certificate of Need in Oregon**

Chair Senator Patterson, Members of the Committee,

Thank you for the opportunity to write a testimony on the critical need for a Certificate of Need (CON) requirement for hospice services in Oregon. As someone deeply invested in the quality and integrity of end-of-life care, I urge this committee to take action to prevent the oversaturation of hospice providers and protect vulnerable patients and families.

Addressing Rural Need vs. Oversaturation in Urban Areas

Oregon's hospice landscape is currently unbalanced. While rural communities struggle with access to quality hospice services, many highly populated areas are experiencing oversaturation, with a rapid influx of new providers. Without a CON requirement, hospice licenses are being granted indiscriminately, leading to a misallocation of resources and a decline in the standard of care.

Protecting Against Hospice Abuse and Fraud

Other states, such as California, have implemented a moratorium on new hospice licenses due to rampant fraud and abuse. In Oregon, the lack of regulatory oversight is opening the door to similar issues. Neighboring states with stricter hospice regulations are overflowing into Oregon, with businesses applying for licenses here—not based on community need, but rather as a business opportunity.

Without proper oversight, fraudulent or low-quality providers will proliferate, taking advantage of financial gain while failing to provide the compassionate, high-quality care that hospice patients deserve. A CON process would allow the state to vet applicants carefully and ensure that new providers are entering the market based on need rather than profit motives.

Decline in Quality of Care in Non-CON States

There is clear, data-driven evidence that states without a CON process for hospices experience a decline in quality of care. Federal CMS star ratings, which evaluate hospice providers based on patient experience and outcomes, show that states without CON requirements have lower overall ratings. This decline results from profit-driven, high-volume hospice enrollment without the necessary safeguards to maintain high standards of care.

By allowing unchecked expansion, Oregon risks:

- Decreasing federal quality scores
- Increasing patient and family complaints
- Overburdening regulatory agencies with investigations into poor-performing hospice


Ensuring Patients and Families Receive the Best Care

Ultimately, hospice care should be about quality over quantity. By allowing unrestricted hospice proliferation, Oregon is jeopardizing the well-being of dying patients and their families. Patients in their final stages of life deserve to receive care from highly qualified, reputable, and compassionate providers—not from operators focused primarily on financial gain.

A Certificate of Need process would provide Oregon with the necessary oversight and control to ensure that hospice growth is intentional, ethical, and aligned with actual community needs. I urge this committee to take proactive steps to implement stronger regulatory measures to protect our most vulnerable citizens.

Thank you for your time and consideration. I am available to answer any questions you may have at Willamette Vital Health, 503-588-3600.

Sincerely,

A handwritten signature in black ink, appearing to read "Iria T. Nishimura". The signature is fluid and cursive, with the first name "Iria" being the most prominent part.

Iria T. Nishimura, MSN, RN
Chief Executive Officer