## Rate Year 2023 Uncompensated Care Report

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This document contains the staff report for RY 2023 Uncompensated Care Policy. There are no proposed changes in methodology and thus no need for a formal Commission vote at this time.

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#### INTRODUCTION

Recognizing the financial burden hospitals take on when providing quality care to patients who cannot pay for it, the HSCRC factors in the cost of Uncompensated Care (UCC) into the rates the Commission sets for hospitals. The purpose of this report is to provide background information on the UCC policy and to provide hospital-specific values for the UCC built into statewide rates as well as the amount of funding that will be made available for the UCC pool, the latter of which ensures the burden of uncompensated care is shared equitably across all hospitals.

Uncompensated Care (UCC) is hospital care provided for which no compensation is received, typically a combination of charity care and bad debt.

#### **Charity Care**

Charity care services are "those Commission regulated services rendered for which payment is not anticipated". Charity care is provided to patients who lack health care coverage or whose health care coverage does not pay the full cost of the hospital bill. There are two types of charity care that may occur across all payers:

- 1. **Free care** is care for which the patient is not responsible for any out-of-pocket expenses for hospital care. Hospitals are required statutorily to provide free care to patients with a household income less than 200% of the FPL.<sup>3</sup>
- 2. **Reduced-cost care** is care for which the patient is only responsible for a portion of out-of-pocket expenses and is required for patients with household income between 200 and 300% of the FPL. Reduced-cost care is also required for patients that have a financial hardship<sup>5</sup> and have household incomes below 500% of the FPL. Financial hardship is defined by statute as medical debt, incurred by a household over a 12-month period, which exceeds 25% of household income. There is no prescribed discount that hospitals must provide to patients between 200% and 500% of the FPL. Per statute "if a patient is eligible for reduced-cost medically necessary care, the hospital shall apply the reduction that is most favorable to the patient."

#### **Bad Debt**

The other type of Hospital UCC is bad debt, which is for "Commission regulated services rendered for which payment is anticipated and credit is extended to the patient" but the payment is not made. Unpaid cost share for patients that do not meet the free thresholds can be charged as bad debt after the hospital makes a reasonable attempt to collect those charges.<sup>8</sup> However, there

<sup>&</sup>lt;sup>1</sup> Maryland has a unique all-payer rate setting system for hospitals, administered by the HSCRC. Acute general hospitals in Maryland must charge patients (and insurers) the rate set by the HSCRC for health care services.

<sup>&</sup>lt;sup>2</sup> HSCRC Accounting and Budget Manual Section 100, "Accounting Principles and Concepts", p. 39, August 2008, Available at: <a href="https://hscrc.maryland.gov/Documents/Hospitals/Compliance/AccountingBudgetManual/2018/SECTION-100-FINAL-08-01-10.pdf">https://hscrc.maryland.gov/Documents/Hospitals/Compliance/AccountingBudgetManual/2018/SECTION-100-FINAL-08-01-10.pdf</a>

<sup>&</sup>lt;sup>3</sup> Md. Code, § 19-214.1(b)(2) (i) of the Health General Article

<sup>&</sup>lt;sup>4</sup> COMAR 10.37.10.26 A-2 (2)(a)(ii)

<sup>&</sup>lt;sup>5</sup> Md. Code, § 19-214.1(a)(2) of the Health General Article

<sup>&</sup>lt;sup>6</sup> Md. Code, § 19-214.1(b)(4) of the Health General Article

<sup>&</sup>lt;sup>7</sup> Md. Code, § 19-214.1(b)(5) of the Health General Article

<sup>&</sup>lt;sup>8</sup> Bad debt includes unpaid cost share expenses reduced by a reduced-cost care discount for patients eligible for reduced-cost care. The HSCRC requires hospitals to make "a reasonable collection effort" before writing-off bad debt. HSCRC Accounting and Budget Manual Section 100, "Accounting Principles and Concepts", p. 39, August 2008, Available at:

are several reasons that a hospital may not include bad debts into uncompensated care, most notably denials.<sup>9</sup>

HSCRC's UCC policy assures access to hospital services in the State for those patients who cannot readily pay for them and equitably distributes the burden of uncompensated care costs across all hospitals and all payers. This approach ensures that hospitals with high volumes of low-income patients are not at a financial disadvantage.

For RY 2023, the determined UCC amount to be built into rates for Maryland hospitals is 4.20 percent. Under the current HSCRC policy, UCC above the statewide average is funded by a statewide pooling system whereby regulated Maryland hospitals draw funds from the pool should they experience a greater-than-average level of UCC and pay into the pool should they experience a less-than-average level of UCC. This ensures that the cost of UCC is shared equally across all hospitals within the State.

#### **METHODOLOGY**

The UCC methodology is a cornerstone of the HSCRC's all payer system. In addition to equitably supporting financial assistance for low income patients, the policy incentivizes hospitals to responsibly collect payments from patients and payers who can afford to pay. This prevents UCC costs from rising too quickly, protecting the sustainability of the UCC fund, which in turn ensures that UCC funding remains available for those who truly need it while constraining growth of health care rates for all patients and payers.<sup>10</sup>

The HSCRC <u>prospectively</u> calculates the amount of uncompensated care provided in hospital rates at each regulated Maryland hospital using a multi-step process:

1. Statewide Actual UCC in All-Payer Hospital Rates: HSCRC builds UCC funding into hospital rates based on the total amount of charity care and bad debt reported by all acute hospitals for the previously completed fiscal year. The UCC markup to hospital rates is based on statewide actual UCC, expressed as a percent of gross patient revenue, and is applied uniformly to acute care hospital rates statewide. For example, in RY 2023,

 $\frac{https://hscrc.maryland.gov/Documents/Hospitals/Compliance/AccountingBudgetManual/2018/SECTION-100-FINAL-08-01-10.}{pdf}$ 

These include: a) Contractual allowances and adjustments associated with Commission approved differentials—i.e., prompt payment, SAAC, and the differential granted to Medicare and Medicaid.; b) Administrative, Courtesy and Policy Discounts and Adjustments - These include, but are not limited to, reductions from established rates for courtesy discounts, employee discounts, administrative decision discounts, discounts to patients not meeting charity policy guidelines, undocumented charges and, payments for services denied by third party payers; c) Charges for medically unnecessary hospital services; ). Charges written off that are not the result of a patient's inability to pay or where the hospital has not expended a reasonable collection effort - 08/01/08 SECTION 100 ACCOUNTING PRINCIPLES AND CONCEPTS I

<sup>&</sup>lt;sup>10</sup> Other states have struggled to maintain sustainable uncompensated care funds. One example is New Jersey. H S Berliner, S Delgado, "The rise and fall of New Jersey's uncompensated care fund", J Am Health Policy. Sep-Oct 1991;1(2):47-50. https://pubmed.ncbi.nlm.nih.gov/10112731/.

HSCRC staff will use RY 2021 statewide UCC experience of 4.20 percent to determine the UCC amount built into all hospital rates.

#### 2. Hospital Payments or Contributions to the UCC Fund

The UCC Fund is used to redistribute funds from hospitals with lower rates of UCC to hospitals with higher rates of UCC.

- i. Hospital-Specific Actual UCC: HSCRC uses gross patient revenue as reported on the hospitals' annual financial filings for the previous year to determine the hospital-specific actual UCC for each hospital<sup>11</sup>. (See Appendix II).
- Hospital-Specific Predicted UCC: This step involves use of a logistic regression ii. model to predict the UCC. HSCRC allows a 9-month runout period for charity care and bad debt Write-Off reporting. This means hospitals have 9 months from the end of a fiscal year to report charity care and bad debt that occurred in that fiscal year in their Write-Off data submissions to the Commission. HSCRC then uses that amount to predict the UCC amount built into hospital rates for the next fiscal year using area deprivation Index (ADI), <sup>12</sup> payer type, and site of care as independent variables in the logistic regression. An expected UCC dollar amount is calculated for every patient encounter. UCC dollars are summed at the hospital level, and summed UCC dollars are divided by hospital total charges to establish the hospital's estimated UCC level. Incorporating predicted UCC into the methodology provides hospitals with a financial incentive to collect payments so that UCC does not rise too quickly and UCC funds remain available for those who truly need it. Because UCC is paid by patients and insurers through rates, uncontrolled increases in UCC could increase hospital rates for everyone.
- iii. **Blended Actual and Predicted UCC:** The HSCRC calculates a 50/50 blend between the hospital-specific actual UCC (described in step i) and the hospital-specific predicted UCC (described in step ii). All individual hospital values for payment or withdrawal from the UCC Fund are then normalized to ensure that the UCC fund is redistributive in nature. (See Appendix I).
- iv. **Determining hospital contribution/withdrawals:** The 50/50 blend (step iii) for each hospital is subtracted from the amount of state-wide actual UCC funding provided in rates (step 1) and multiplied by the hospital's global budget revenue (GBR) to determine how much each hospital will either withdraw from or pay into the statewide UCC Fund. The Fund is the mechanism through which HSCRC ensures the burden of uncompensated care is shared by all hospitals. Specifically, if a hospital's 50/50 blend is less than the statewide average UCC rate

<sup>&</sup>lt;sup>11</sup> Before ACA, HSCRC based the Actual UCC included in pool funding calculations on a 3-year rolling average. This smooths the year over year hospital-specific changes in UCC. In anticipation of large decreases in UCC in 2014, HSCRC adjusted their policy to use 1 year of data, to avoid carrying over higher UCC amounts

<sup>12 &</sup>quot;The Area Deprivation Index ...allows for rankings of neighborhoods by socioeconomic disadvantage in a region of interest .... including] factors for...income, education, employment, and housing quality." <a href="https://www.neighborhoodatlas.medicine.wisc.edu/">https://www.neighborhoodatlas.medicine.wisc.edu/</a>

(determined in step 1), the hospital will pay into the UCC Fund. Conversely, if a hospital's 50/50 blend is greater than the statewide average UCC rate, the hospital will withdraw from the Fund.

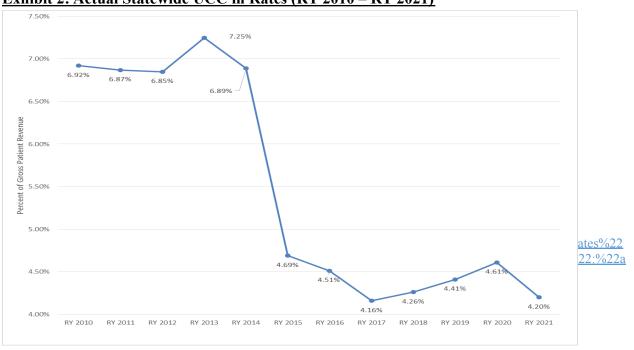
**Exhibit 1: UCC Methodology Example (\$ Millions)** 

|               |       | <u>St</u>                           | tep 1                                  | <u>Step 2 (i)</u>                               | <u>Step 2 (ii)</u>                          | Step 2 (iii)                      | <b>Step 2 (iv)</b>                             |  |
|---------------|-------|-------------------------------------|--|---|---|-----------------------------------|--|--|
|               | A     | В                                   | C = A X B                              | D   | E   | F = Avg D & E                     | G = (F-B) X A                                  |  |
|               | GBR   | Prior Year<br>Statewide<br>UCC Rate | UCC<br>Funding<br>Provided in<br>Rates | Prior Year<br>Hospital-<br>Specific UCC<br>Rate | Predicted<br>Hospital-spec<br>ific UCC Rate | Hospital-Speci<br>fic 50/50 Blend | (Payment) or<br>Withdrawal<br>from UCC<br>Fund |  |
| Hospital<br>A | \$300 | 5%                                  | \$15                                   | 3%  | 4%  | 3.50%                             | (\$4.50)                                       |  |
| Hospital<br>B | \$300 | 5%                                  | \$15                                   | 7%  | 6%  | 6.50%                             | \$4.50   |  |

#### **ASSESSMENT**

Based on RY 2021 audited reports, the HSCRC has determined that the percentage of UCC to incorporate in hospitals' rates in order to fund the UCC pool is 4.20 percent, 0.41 percentage points lower than last year's UCC rate of 4.61 percent. The graph below shows the changes in Actual Statewide UCC incorporated in hospital rates since RY 2010. According to the statistics published by the U.S. Census Bureau on September 16, 2015, the rate of Marylanders without health insurance decreased from 10.2 percent in 2013 to 7.9 percent in 2014. Based on the Census Bureau's American Community Survey, Kaiser Family Foundation estimates Maryland's uninsured rate to have decreased to 5.9 percent as of 2019; however, as the RY17 to RY20 experience demonstrates, the continuing reductions in UCC that resulted from the implementation of the Affordable Care Act and the lowering of the uninsured population has dissipated.

Exhibit 2: Actual Statewide UCC in Rates (RY 2010 – RY 2021)



Additional analyses indicate that the RY2021 decline in statewide UCC is driven in part by significant statewide declines in hospital utilization most likely to result in UCC; with declines in ED utilization being the biggest driver (See Exhibit 3 and 4 below). The HSCRC's model to predict UCC is based on the patients' payer type, ADI and site of service, and the probability of a patient subsequently deemed as having UCC is historically highest amongst commercial patients presenting though the ED. Thus, the significant declines in ED utilization by commercial patients having a write-off to UCC (52 percent; the highest among major payer types) subsequently results in declines in UCC and reduces the ED utilization's share of total hospital services resulting in UCC. With the ongoing effects of the pandemic still looming, most notably reduced ED utilization, and the protections put in place by the state to ensure coverage and patient access to care, most notably through the suspension of Medicaid eligibility redeterminations, staff predicts that this trend will continue into the RY2022 and RY 2023 UCC Policy calculations. If UCC normalizes and trends back upwards, future iterations of the UCC policy will provide an enhanced UCC markup in rates in line with the most recent UCC actual, as per the design of the policy.

Exhibit 3: Percent Change from FY18 – FY21 by Site of Service and Payer for Patients with Write-Off to UCC

|                    | CHA                        | RITY/SELI                  | F PAY                      | COMMERCIAL                 |                            | I                     | MEDICAID N                 |                            |                            | MEDICARE                   |                            |                       | OTHER                      |                            |                            |
|--------------------|----------------------------|----------------------------|----------------------------|----------------------------|----------------------------|-----------------------|----------------------------|----------------------------|----------------------------|----------------------------|----------------------------|-----------------------|----------------------------|----------------------------|----------------------------|
| Site of<br>Service | %<br>Change<br>FY18-1<br>9 | %<br>Change<br>FY19-2<br>0 | %<br>Change<br>FY20-2<br>1 | %<br>Change<br>FY18-1<br>9 | %<br>Change<br>FY19-2<br>0 | %<br>Change<br>FY20-2 | %<br>Change<br>FY18-1<br>9 | %<br>Change<br>FY19-2<br>0 | %<br>Change<br>FY20-2<br>1 | %<br>Change<br>FY18-1<br>9 | %<br>Change<br>FY19-2<br>0 | %<br>Change<br>FY20-2 | %<br>Change<br>FY18-1<br>9 | %<br>Change<br>FY19-2<br>0 | %<br>Change<br>FY20-2<br>1 |
| ED                 | 7.97%                      | -9.63%                     | -42.24%                    | -8.51%                     | -20.56%                    | -52.03%               | 9.68%                      | -9.36%                     | -31.93%                    | -5.24%                     | -17.65%                    | -35.22%               | 7.14%                      | -8.64%                     | -64.41%                    |
| IP                 | 34.99%                     | 2.55%                      | -11.65%                    | -6.70%                     | -11.73%                    | -24.91%               | 0.51%                      | 4.21%                      | -45.53%                    | -0.95%                     | -1.99%                     | -26.23%               | 12.86%                     | 0.52%                      | -30.77%                    |
| OP                 | 32.64%                     | -1.90%                     | -11.92%                    | -7.98%                     | -22.24%                    | -19.89%               | 14.34%                     | -26.23%                    | -19.30%                    | -10.65%                    | -21.03%                    | -26.86%               | -30.61%                    | -6.35%                     | -42.15%                    |
| Grand<br>Total     | 16.57%                     | -6.61%                     | -29.51%                    | -8.15%                     | -20.41%                    | -35.42%               | 9.45%                      | -9.59%                     | -31.82%                    | -7.37%                     | -16.74%                    | -29.54%               | -4.91%                     | -7.16%                     | -53.32%                    |

**Exhibit 4: Site of Service Shares for Patients with Write-Off to UCC** 

| Site of<br>Service | RY 2018 | RY 2019 | RY 2020 | RY 2021 |
|--------------------|---------|---------|---------|---------|
| ED                 | 54.3%   | 54.5%   | 54.4%   | 50.2%   |
| IP                 | 8.6%    | 8.8%    | 9.6%    | 10.2%   |
| ОР                 | 37.1%   | 36.8%   | 36.0%   | 39.6%   |

#### **IMPLEMENTATION**

Based on the preceding analysis, HSCRC staff will implement the following for RY 2023:

1. Decrease the statewide UCC provision in rates from 4.61% to 4.20% effective July 1, 2022.

- 2. Continue to use the regression modeling approach approved by the Commission at the June 2016 meeting.
- 3. Continue to do 50/50 blend of RY2021 audited UCC levels and RY2021 predicted UCC levels to determine hospital-specific adjustments for the UCC Fund.

### **COVID-19 IMPLICATIONS**

In CY 2020, Staff began evaluating the possibility of using multi-year actual UCC averages in lieu of the one year figures to do the 50/50 blend with predicted UCC from the regression. Staff believes that using two or more years of history will make the statistic more stable, especially as the declining trends due to the implementation of the Affordable Care Act appear to have dissipated. Staff also believes that the use of multi-year averages will help control for anomalies such as the effects of Covid-19 on hospital Utilization. Staff however has halted further work on this and other policy development to allow the hospitals sufficient bandwidth to respond to the pandemic. Staff plans to resume evaluation of the multi-year blend on actuals for the RY 2024 UCC policy.

Staff was also concerned about the impact of COVID-19 on the RY2021 Write-off data used to predict RY 2023 UCC. To ensure that the data was reliable and accurate, staff performed various statistical and trend analyses on the data and found that the data is significantly correlated to data used in prior year UCC calculations, thereby suggesting the data is reliable. (See appendix III).

Staff will also like to acknowledge that while specialty care sites were opened to handle added volumes brought on by COVID-19 at the height of the pandemic, such as Laurel Hospital and The Baltimore Convention Center, these sites of care are not included with current UCC calculations, as the UCC borne by these facilities are covered by the State and these facilities will not continue to operate in the capacity they did during the public health emergency.

## **Appendix I. Hospital Uncompensated Care Provision for RY 2023**

| HOSPI<br>D | HOSPNAME                         | FY2022 GBR<br>Permanent<br>Revenue | Base<br>2022<br>Peri | 2021 UCC<br>ed on FY<br>2 GBR<br>manent<br>enue | FY 2021<br>Percent UCC<br>from the RE<br>Schedule | Percent<br>Predicted<br>UCC<br>(Adjusted) | Amo<br>FY 2<br>Peri | dicted UCC<br>ounts (Based on<br>2022 GBR<br>manent<br>enue) | 50/50 Blend<br>Percent | FY<br>FY<br>Pe | /50 Blend Adjusted to<br>Y 2021 UCC Based on<br>Y 2022 GBR<br>ermanent Revenue<br>evel | Percent<br>UCC |
|------------|----------------------------------|------------------------------------|----------------------|---|---|---|---------------------|--|------------------------|----------------|--|----------------|
| 210001     | Meritus Medical Cntr             | \$414,702,125                      | \$                   | 20,651,004                                      | 4.98%   | 4.86%                                     | \$                  | 20,162,634   | 4.92%                  | \$             | 22,921,540   | 5.53%          |
| 210002     | UMMC                             | \$1,762,263,450                    | \$                   | 67,865,990                                      | 3.85%   | 2.51%                                     | \$                  | 44,306,079   | 3.18%                  | \$             | 62,997,485   | 3.57%          |
| 210003     | UM-Prince George's<br>Hospital   | \$360,327,339                      | \$                   | 37,867,023                                      | 10.51%  | 4.93%                                     | \$                  | 17,750,048   | 7.72%                  | \$             | 31,235,366   | 8.67%          |
| 210004     | Holy Cross                       | \$566,608,070                      | \$                   | 39,504,563                                      | 6.97%   | 4.81%                                     | \$                  | 27,235,202   | 5.89%                  | \$             | 37,482,034   | 6.62%          |
| 210005     | Frederick Memorial               | \$378,562,405                      | \$                   | 15,963,062                                      | 4.22%   | 3.31%                                     | \$                  | 12,545,894   | 3.77%                  | \$             | 16,011,049   | 4.23%          |
| 210006     | UM-Harford Memorial              | \$113,970,044                      | \$                   | 7,325,922                                       | 6.43%   | 3.39%                                     | \$                  | 3,867,974  | 4.91%                  | \$             | 6,286,657  | 5.52%          |
| 210008     | Mercy Medical Cntr               | \$620,468,373                      | \$                   | 29,031,401                                      | 4.68%   | 3.35%                                     | \$                  | 20,776,792   | 4.01%                  | \$             | 27,973,014   | 4.51%          |
| 210009     | Johns Hopkins                    | \$2,798,682,521                    | \$                   | 65,233,712                                      | 2.33%   | 2.52%                                     | \$                  | 70,630,416   | 2.43%                  | \$             | 76,303,294   | 2.73%          |
| 210010     | UM-SRH at Dorchester             | \$20,791,578                       | \$                   | 1,480,641                                       | 7.12%   | 6.29%                                     | \$                  | 1,306,959  | 6.70%                  | \$             | 1,565,557  | 7.53%          |
| 210011     | St. Agnes Hospital               | \$469,325,568                      | \$                   | 20,640,411                                      | 4.40%   | 5.50%                                     | \$                  | 25,822,761   | 4.95%                  | \$             | 26,094,401   | 5.56%          |
| 210012     | Sinai Hospital                   | \$917,237,944                      | \$                   | 30,265,551                                      | 3.30%   | 3.05%                                     | \$                  | 27,944,338   | 3.17%                  | \$             | 32,691,531   | 3.56%          |
| 210015     | MedStar Franklin<br>Square       | \$611,317,028                      | \$                   | 20,110,400                                      | 3.29%   | 3.19%                                     | \$                  | 19,516,057   | 3.24%                  | \$             | 22,254,802   | 3.64%          |
| 210016     | Washington Adventist<br>Hospital | \$321,314,660                      | \$                   | 24,245,108                                      | 7.55%   | 3.49%                                     | \$                  | 11,218,111   | 5.52%                  | \$             | 19,916,666   | 6.20%          |
| 210017     | Garrett Co Memorial              | \$70,456,150                       | \$                   | 4,315,701                                       | 6.13%   | 6.13%                                     | \$                  | 4,319,463  | 6.13%                  | \$             | 4,849,636  | 6.88%          |
| 210018     | MedStar Montgomery               | \$190,272,080                      | \$                   | 7,491,143                                       | 3.94%   | 1.78%                                     | \$                  | 3,386,671  | 2.86%                  | \$             | 6,109,140  | 3.21%          |
| 210019     | Peninsula Regional               | \$502,552,923                      | \$                   | 18,099,584                                      | 3.60%   | 4.64%                                     | \$                  | 23,342,162   | 4.01%                  | \$             | 23,274,294   | 4.63%          |
| 210022     | Suburban                         | \$376,087,520                      | \$                   | 14,298,615                                      | 3.80%   | 1.57%                                     | \$                  | 5,922,584  | 2.69%                  | \$             | 11,356,523   | 3.02%          |
| 210023     | Anne Arundel Medical<br>Cntr     | \$706,611,415                      | \$                   | 18,069,162                                      | 2.56%   | 1.90%                                     | \$                  | 13,392,344   | 2.23%                  | \$             | 17,669,245   | 2.50%          |
| 210024     | MedStar Union<br>Memorial        | \$455,550,559                      | \$                   | 13,719,467                                      | 3.01%   | 3.53%                                     | \$                  | 16,096,954   | 3.27%                  | \$             | 16,745,341   | 3.68%          |
| 210027     | Western Maryland                 | \$442,114,709                      | \$                   | 19,658,351                                      | 4.45%   | 6.31%                                     | \$                  | 27,887,291   | 5.38%                  | \$             | 26,702,333   | 6.04%          |
| 210028     | MedStar St. Mary's               | \$198,569,196                      | \$                   | 5,867,698                                       | 2.95%   | 2.28%                                     | \$                  | 4,522,814  | 2.62%                  | \$             | 5,835,465  | 2.94%          |
| 210029     | JH Bayview                       | \$760,736,567                      | \$                   | 34,155,762                                      | 4.49%   | 4.30%                                     | \$                  | 32,717,834   | 4.40%                  | \$             | 37,557,196   | 4.94%          |
| 210030     | UM-SRH at<br>Chestertown         | \$55,479,928                       | \$                   | 3,276,629                                       | 5.91%   | 3.51%                                     | \$                  | 1,947,173  | 4.71%                  | \$             | 2,933,764  | 5.29%          |

| 210032 | Union Hospital of Cecil<br>Co     | \$176,995,571        | \$<br>11,548,612  | 6.52% | 3.23% | \$<br>5,708,465   | 4.88% | \$   | 9,691,829   | 5.48% |
|--------|-----------------------------------|----------------------|-------------------|-------|-------|-------------------|-------|------|-------------|-------|
| 210033 | Carroll Co Hospital<br>Cntr       | \$249,918,479        | \$<br>7,987,395   | 3.20% | 2.26% | \$<br>5,654,440   | 2.73% | \$   | 7,661,455   | 3.07% |
| 210034 | MedStar Harbor<br>Hospital Cntr   | \$205,614,800        | \$<br>8,075,101   | 3.93% | 4.70% | \$<br>9,668,532   | 4.31% | \$   | 9,965,085   | 4.85% |
| 210035 | UM-Charles Regional               | \$165,219,509        | \$<br>10,019,384  | 6.06% | 3.35% | \$<br>5,543,033   | 4.71% | \$   | 8,740,082   | 5.29% |
| 210037 | UM-SRH at Easton                  | \$255,848,352        | \$<br>9,574,657   | 3.74% | 2.70% | \$<br>6,895,702   | 3.22% | \$   | 9,249,996   | 3.62% |
| 210038 | UMMC - Midtown                    | \$341,725,972        | \$<br>17,258,289  | 5.05% | 3.97% | \$<br>13,577,472  | 4.51% | \$   | 17,317,817  | 5.07% |
| 210039 | Calvert Health Med<br>Cntr        | \$164,614,286        | \$<br>4,137,092   | 2.51% | 1.95% | \$<br>3,208,087   | 2.23% | \$   | 4,125,161   | 2.51% |
| 210040 | Northwest Hospital<br>Cntr        | \$289,860,605        | \$<br>14,885,928  | 5.14% | 3.76% | \$<br>10,890,287  | 4.45% | \$   | 14,476,302  | 4.99% |
| 210043 | UM-BWMC                           | \$480,654,281        | \$<br>26,315,560  | 5.47% | 2.50% | \$<br>12,002,672  | 3.99% | \$   | 21,520,083  | 4.48% |
| 210044 | GBMC                              | \$490,075,990        | \$<br>15,896,550  | 3.24% | 2.29% | \$<br>11,225,955  | 2.77% | \$   | 15,232,398  | 3.11% |
| 210048 | Howard County<br>General          | \$331,665,468        | \$<br>14,650,318  | 4.42% | 2.21% | \$<br>7,337,433   | 3.31% | \$   | 12,348,645  | 3.72% |
| 210049 | UM-Upper Chesapeake               | \$343,612,512        | \$<br>19,415,563  | 5.65% | 2.34% | \$<br>8,033,497   | 3.99% | \$   | 15,415,796  | 4.49% |
| 210051 | Doctors Community                 | \$278,725,839        | \$<br>13,140,414  | 4.71% | 3.74% | \$<br>10,425,017  | 4.23% | \$   | 13,234,693  | 4.75% |
| 210056 | MedStar Good<br>Samaritan         | \$321,621,636        | \$<br>12,519,934  | 3.89% | 3.93% | \$<br>12,633,778  | 3.91% | \$   | 14,126,695  | 4.39% |
| 210057 | Shady Grove Adventist<br>Hospital | \$498,926,118        | \$<br>31,254,800  | 6.26% | 3.47% | \$<br>17,302,774  | 4.87% | \$   | 27,270,649  | 5.47% |
| 210060 | Fort Washington<br>Medical Center | \$61,378,051         | \$<br>4,519,868   | 7.36% | 4.79% | \$<br>2,942,818   | 6.08% | \$   | 4,191,154   | 6.83% |
| 210061 | Atlantic General                  | \$116,767,136        | \$<br>4,375,748   | 3.75% | 3.55% | \$<br>4,140,340   | 3.65% | \$   | 4,782,760   | 4.10% |
| 210062 | MedStar Southern MD               | \$295,292,257        | \$<br>13,323,871  | 4.51% | 2.85% | \$<br>8,406,003   | 3.68% | \$   | 12,203,817  | 4.13% |
| 210063 | UM-St. Joseph Med<br>Cntr         | \$418,215,972        | \$<br>15,461,763  | 3.70% | 2.34% | \$<br>9,768,008   | 3.02% | \$   | 14,169,411  | 3.39% |
| 210065 | HC-Germantown                     | \$125,846,870        | \$<br>8,424,608   | 6.69% | 5.53% | \$<br>6,960,533   | 6.11% | \$   | 8,640,522   | 6.87% |
|        |                                   |                      |                   |       |       |                   |       |      |             |       |
|        | Total                             | \$<br>18,726,581,857 | \$<br>781,922,352 | 4.17% | 3.23% | \$<br>608,943,405 | 3.71% | \$ 7 | 781,130,683 | 4.17% |

**Note:** Levindale, UMROI, and UM-Shock Trauma are not included in this analysis. If included, the actual UCC from RY 2021 RE Schedule would be 4.20%. This rate of 4.20% is what is built into rates.

## **Appendix II. Actual UCC Summary Statistics**

The table below shows the Actual UCC Statewide and by hospital between RY 2021 and RY 2020—it does not reflect predicted UCC rates.

| Hospital Name                | RY2021 % UCC | RY 2020 % UCC | Variance Over/Under |
|------------------------------|--------------|---------------|---------------------|
| Meritus Medical Cntr         | 4.98%        | 5.19%         | -0.21%              |
| UMMC                         | 3.85%        | 3.91%         | -0.06%              |
| UM-Prince George's Hospital  | 10.51%       | 8.79%         | 1.72%               |
| Holy Cross                   | 6.97%        | 7.95%         | -0.98%              |
| Frederick Memorial           | 4.22%        | 4.52%         | -0.30%              |
| UM-Harford Memorial          | 6.43%        | 6.55%         | -0.12%              |
| Mercy Medical Cntr           | 4.68%        | 5.14%         | -0.46%              |
| Johns Hopkins                | 2.33%        | 3.04%         | -0.71%              |
| UM-SRH at Dorchester         | 7.12%        | 6.12%         | 1.00%               |
| St. Agnes Hospital           | 4.40%        | 5.39%         | -0.99%              |
| Sinai Hospital               | 3.30%        | 4.12%         | -0.82%              |
| MedStar Franklin Square      | 3.29%        | 3.72%         | -0.43%              |
| Washington Adventist         | 7.55%        | 6.71%         | 0.84%               |
| Garrett Co Memorial          | 6.13%        | 6.55%         | -0.42%              |
| MedStar Montgomery           | 3.94%        | 3.69%         | 0.25%               |
| Peninsula Regional           | 3.60%        | 4.13%         | -0.53%              |
| Suburban                     | 3.80%        | 3.95%         | -0.15%              |
| Anne Arundel Medical Cntr    | 2.56%        | 3.28%         | -0.72%              |
| MedStar Union Memorial       | 3.01%        | 3.01%         | 0.00%               |
| Western Maryland             | 4.45%        | 4.79%         | -0.34%              |
| MedStar St. Mary's           | 2.95%        | 3.51%         | -0.56%              |
| JH Bayview                   | 4.49%        | 5.21%         | -0.72%              |
| UM-SRH at Chestertown        | 5.91%        | 6.15%         | -0.24%              |
| Union Hospital of Cecil Co   | 6.52%        | 6.02%         | 0.50%               |
| Carroll Co Hospital Cntr     | 3.20%        | 3.48%         | -0.28%              |
| MedStar Harbor Hospital Cntr | 3.93%        | 4.97%         | -1.04%              |
| UM-Charles Regional          | 6.06%        | 6.22%         | -0.16%              |
| UM-SRH at Easton             | 3.74%        | 3.50%         | 0.24%               |
| UMMC - Midtown               | 5.05%        | 4.45%         | 0.60%               |
| Calvert Health Med Cntr      | 2.51%        | 3.17%         | -0.66%              |
| Northwest Hospital Cntr      | 5.14%        | 6.52%         | -1.38%              |
| UM-BWMC                      | 5.47%        | 5.72%         | -0.25%              |
| GBMC                         | 3.24%        | 2.93%         | 0.31%               |
| Howard County General        | 4.42%        | 5.24%         | -0.82%              |

| UM-Upper Chesapeake    | 5.65% | 6.02% | -0.37% |
|------------------------|-------|-------|--------|
| Doctors Community      | 4.71% | 6.86% | -2.15% |
| MedStar Good Samaritan | 3.89% | 4.52% | -0.63% |
| Shady Grove            | 6.26% | 6.47% | -0.21% |
| UM-ROI                 | 3.70% | 3.95% | -0.25% |
| FT. Washington         | 7.36% | 7.30% | 0.06%  |
| Atlantic General       | 3.75% | 5.64% | -1.89% |
| MedStar Southern MD    | 4.51% | 4.93% | -0.42% |
| UM-St. Joseph Med Cntr | 3.70% | 3.70% | 0.00%  |
| Levindale              | 6.10% | 4.80% | 1.30%  |
| HC-Germantown          | 6.69% | 8.68% | -1.99% |
| UM-Shock Trauma        | 6.20% | 6.28% | -0.08% |
| Total                  | 4.20% | 4.61% | -0.41% |

**Note:** Free-Standing EDs and/or Medical Centers, Behavior Health and Specialty Hospitals are not included in this analysis **Source:** HSCRC RE Schedules

# **Appendix III. Write-off Data Analyses**

|        |                        | RY 2021             |                  | RY                  | 2020             | RY                  | 2019             |
|--------|------------------------|---------------------|------------------|---------------------|------------------|---------------------|------------------|
| HOSPID | Hospital<br>Name       | Total Charge        | PREDICTED<br>UCC | Total Charge        | PREDICTED<br>UCC | Total Charge        | PREDICTED<br>UCC |
| 210001 | Meritus                | \$<br>429,296,231   | \$<br>20,753,055 | \$<br>362,989,191   | \$<br>19,737,440 | \$<br>369,036,976   | \$<br>18,134,597 |
| 210002 | UMMC                   | \$<br>1,680,523,275 | \$<br>42,009,833 | \$<br>1,555,084,757 | \$<br>39,831,911 | \$<br>1,523,304,722 | \$<br>38,806,181 |
| 210003 | UM-PGHC                | \$<br>342,841,275   | \$<br>16,792,269 | \$<br>341,318,592   | \$<br>25,884,428 | \$<br>324,900,507   | \$<br>23,651,869 |
| 210004 | Holy Cross             | \$<br>557,655,797   | \$<br>26,651,889 | \$<br>511,271,415   | \$<br>31,506,521 | \$<br>518,520,703   | \$<br>36,298,525 |
| 210005 | Frederick              | \$<br>382,396,332   | \$<br>12,600,617 | \$<br>359,679,258   | \$<br>17,816,086 | \$<br>352,965,587   | \$<br>18,341,972 |
| 210006 | UM-Harford             | \$<br>108,950,161   | \$<br>3,676,501  | \$<br>100,457,116   | \$<br>4,082,797  | \$<br>107,480,496   | \$<br>4,624,593  |
| 210008 | Mercy                  | \$<br>619,672,235   | \$<br>20,631,691 | \$<br>548,551,614   | \$<br>21,549,321 | \$<br>553,175,818   | \$<br>21,313,358 |
| 210009 | Johns Hopkins          | \$<br>2,752,683,753 | \$<br>69,073,011 | \$<br>2,453,860,252 | \$<br>77,749,259 | \$<br>2,460,960,900 | \$<br>74,202,193 |
| 210010 | UM-Dorchester          | \$<br>37,159,450    | \$<br>2,322,510  | \$<br>38,406,151    | \$<br>1,883,237  | \$<br>45,223,858    | \$<br>2,314,568  |
| 210011 | St. Agnes              | \$<br>434,651,035   | \$<br>23,778,427 | \$<br>419,501,571   | \$<br>23,171,568 | \$<br>429,347,315   | \$<br>20,409,003 |
| 210012 | Sinai                  | \$<br>890,925,821   | \$<br>26,987,789 | \$<br>818,167,825   | \$<br>29,860,158 | \$<br>786,008,811   | \$<br>27,144,657 |
| 210013 | Grace Medical center   | \$<br>35,924,820    | \$<br>4,269,837  | \$<br>69,512,240    | \$<br>3,574,000  | \$<br>112,480,475   | \$<br>4,908,287  |
| 210015 | MedStar Fr<br>Square   | \$<br>604,008,549   | \$<br>19,172,671 | \$<br>588,927,594   | \$<br>21,459,424 | \$<br>555,859,990   | \$<br>20,641,056 |
| 210016 | Adventist White<br>Oak | \$<br>339,081,563   | \$<br>11,770,837 | \$<br>305,251,723   | \$<br>15,375,366 | \$<br>283,496,544   | \$<br>18,617,983 |
| 210017 | Garrett                | \$<br>65,957,527    | \$<br>4,020,585  | \$<br>59,760,227    | \$<br>3,313,803  | \$<br>65,237,466    | \$<br>3,339,540  |
| 210018 | MedStar<br>Montgomery  | \$<br>189,151,497   | \$<br>3,347,508  | \$<br>184,111,749   | \$<br>6,464,645  | \$<br>179,659,293   | \$<br>6,979,742  |

| 210010 | D : 1                        | Ф                    | 0                 | Φ.                   | 0                 | 0                 | Φ.                |
|--------|------------------------------|----------------------|-------------------|----------------------|-------------------|-------------------|-------------------|
| 210019 | Peninsula                    | \$<br>505,015,288    | \$<br>23,322,642  | \$<br>457,824,421    | \$<br>20,278,255  | \$<br>456,040,357 | \$<br>19,145,025  |
| 210022 | Suburban                     | \$<br>370,346,576    | \$<br>5,798,886   | \$<br>321,763,218    | \$<br>11,652,972  | \$<br>336,195,043 | \$<br>12,930,829  |
| 210023 | Anne Arundel                 | \$<br>697,354,673    | \$<br>13,141,459  | \$<br>639,384,460    | \$<br>23,102,385  | \$<br>638,915,947 | \$<br>21,982,738  |
| 210024 | MedStar Union<br>Mem         | \$<br>453,561,747    | \$<br>15,935,199  | \$<br>429,931,609    | \$<br>14,546,466  | \$<br>421,430,297 | \$<br>15,662,050  |
| 210027 | Western<br>Maryland          | \$<br>352,856,671    | \$<br>22,130,114  | \$<br>337,971,374    | \$<br>15,363,115  | \$<br>336,104,673 | \$<br>14,850,446  |
| 210028 | MedStar St.                  | \$                   | \$                | \$                   | \$                | \$                | \$                |
| 210029 | Mary's<br>JH Bayview         | 207,204,990          | 4,692,572<br>\$   | 199,340,963          | 7,533,670         | 190,651,240       | 7,309,126         |
| 210030 | UM-Chestertow                | 743,246,969<br>\$    | 31,783,180<br>\$  | 654,894,625<br>\$    | 31,784,940<br>\$  | 676,879,971<br>\$ | 33,226,513<br>\$  |
| 210032 | n<br>ChristianaCare,         | 42,056,371<br>\$     | 1,467,622<br>\$   | 41,883,891<br>\$     | 1,809,240<br>\$   | 46,771,763<br>\$  | 1,951,437<br>\$   |
| 210033 | Union<br>Carroll             | 179,194,497<br>\$    | 5,746,397<br>\$   | 163,599,167<br>\$    | 8,504,136<br>\$   | 163,540,394<br>\$ | 7,340,949<br>\$   |
| 210034 | MedStar Harbor               | 250,444,673<br>\$    | 5,634,001<br>\$   | 231,088,487          | 8,487,669<br>\$   | 234,141,186       | 8,301,971<br>\$   |
|        |                              | 199,952,253          | 9,348,597         | 184,401,953          | 8,143,593         | 188,013,249       | 8,530,979         |
| 210035 | UM-Charles<br>Regional       | \$<br>169,142,509    | \$<br>5,642,257   | \$<br>155,083,766    | \$<br>7,883,030   | \$<br>154,875,318 | \$<br>7,461,752   |
| 210037 | UM-Easton                    | \$<br>247,794,590    | \$<br>6,640,513   | \$<br>238,382,456    | \$<br>6,893,256   | \$<br>230,782,936 | \$<br>7,624,533   |
| 210038 | UMMC<br>Midtown              | \$<br>221,889,769    | \$<br>8,765,812   | \$<br>198,376,019    | \$<br>6,565,622   | \$<br>216,362,184 | \$<br>7,733,089   |
| 210039 | Calvert                      | \$<br>163,431,696    | \$<br>3,166,860   | \$<br>156,986,093    | \$<br>5,713,463   | \$<br>152,440,161 | \$<br>5,948,940   |
| 210040 | Northwest                    | \$<br>272,444,317    | \$<br>10,177,517  | \$<br>266,740,312    | \$<br>12,536,995  | \$<br>270,436,111 | \$<br>14,110,094  |
| 210043 | UM-BWMC                      | \$<br>476,591,102    | \$<br>11,833,276  | \$<br>438,316,007    | \$<br>16,079,520  | \$<br>446,838,259 | \$<br>16,705,835  |
| 210044 | GBMC                         | \$<br>524,457,618    | \$                | \$                   | \$                | \$                | \$                |
| 210048 | Howard County                | \$                   | 11,944,947<br>\$  | 470,195,108<br>\$    | 16,421,310        | 476,405,568<br>\$ | 16,595,959        |
| 210049 | UM-Upper                     | 318,841,236<br>\$    | 7,013,460<br>\$   | 300,110,296          | 11,314,679<br>\$  | 307,874,351<br>\$ | 13,533,347        |
| 210051 | Chesapeake<br>Doctors        | 346,058,239<br>\$    | 8,044,495<br>\$   | 311,152,323<br>\$    | 10,502,966<br>\$  | 323,542,686<br>\$ | 11,231,490<br>\$  |
| 210056 | MedStar Good                 | 252,300,061<br>\$    | 9,382,765<br>\$   | 255,559,577<br>\$    | 13,947,959<br>\$  | 256,571,881<br>\$ | 14,478,704<br>\$  |
| 210057 | Sam<br>Shady Grove           | 287,291,214<br>\$    | 11,220,812<br>\$  | 267,313,912<br>\$    | 10,472,083<br>\$  | 258,232,394<br>\$ | 10,783,231<br>\$  |
| 210060 | Ft. Washington               | 496,288,718<br>\$    | 17,113,067<br>\$  | 458,711,466<br>\$    | 23,043,892<br>\$  | 445,836,157<br>\$ | 24,062,522<br>\$  |
| 210061 | Atlantic General             | 63,360,503<br>\$     | 3,020,528<br>\$   | 61,224,082<br>\$     | 4,618,514<br>\$   | 51,952,283<br>\$  | 4,574,910<br>\$   |
|        |                              | 122,092,827          | 4,304,468         | 106,773,194          | 5,540,541         | 110,346,276       | 5,714,101         |
| 210062 | MedStar<br>Southern MD       | \$<br>297,180,588    | \$<br>8,411,470   | \$<br>281,748,091    | \$<br>11,856,408  | \$<br>273,982,766 | \$<br>10,949,621  |
| 210063 | UM-St. Joe                   | \$<br>417,568,750    | \$<br>9,697,222   | \$<br>372,785,338    | \$<br>12,770,361  | \$<br>389,641,461 | \$<br>15,918,298  |
| 210065 | HC-Germantow<br>n            | \$<br>131,726,680    | \$<br>7,244,156   | \$<br>119,287,524    | \$<br>9,113,579   | \$<br>110,764,041 | \$<br>9,383,182   |
|        |                              | , ,                  |                   |                      | , ,               | , ,               | , ,               |
| Total  | Statewide                    | \$<br>18,280,574,451 | \$<br>590,483,324 | \$<br>16,837,681,008 | \$<br>679,740,581 | \$ 16,918,700,246 | \$<br>696,044,899 |
|        |                              |                      |                   |                      |                   |                   |                   |
|        | m + 2 C                      |                      | RY2021 - 2020     | RY2021 - 2019        | RY2020 - 2019     |                   |                   |
|        | Total Charge<br>Correlation  |                      | 99.93%            | 99.93%               | 99.94%            |                   |                   |
|        | Predicted UCC<br>Correlation |                      | 96.87%            | 95.90%               | 99.34%            |                   |                   |