



Medicare Disproportionate Share (DSH) & Uncompensated Care

New York

2025

U.S. Presence

Leading U.S. Firm

\$2.24B

Revenue (FY 2025)*

76

Markets

30

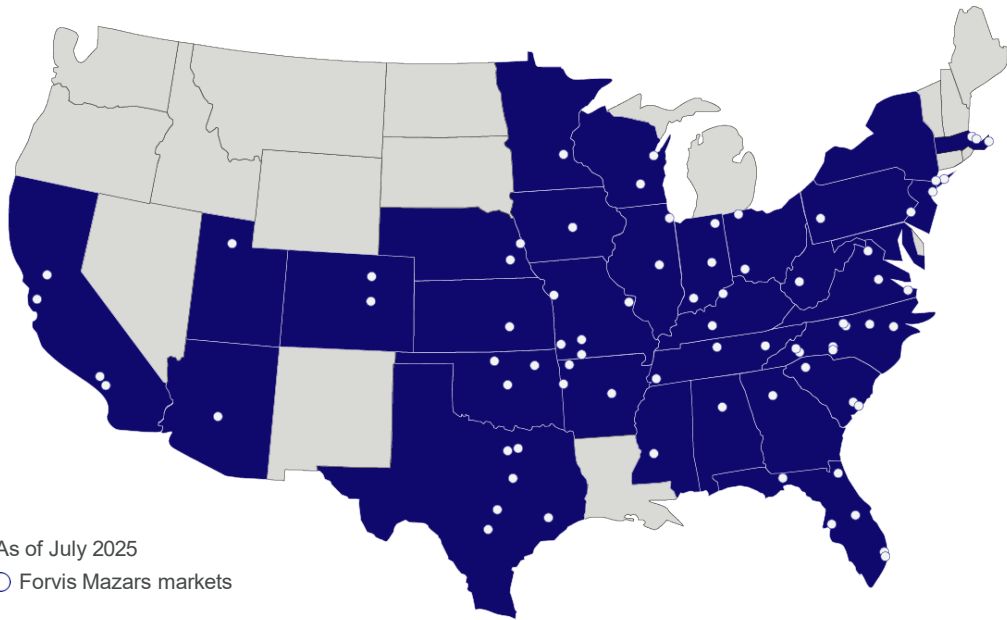
States

600+

Partners & Principals

7,000+

Employees



Alabama
Birmingham

Arizona
Phoenix

Arkansas
Fort Smith
Little Rock
Rogers

California
Irvine
Los Angeles
Sacramento
San Jose

Colorado
Colorado Springs
Denver

Florida
Boca Raton
Fort Lauderdale
Jacksonville
Orlando
Tallahassee
Tampa Bay

Georgia
Atlanta

Illinois
Chicago
Decatur

Indiana
Evansville
Fort Wayne
Indianapolis

Iowa
Des Moines

Kansas
Wichita

Kentucky
Bowling Green
Louisville

Massachusetts
Boston
Brewster
Chestnut Hill

Minnesota
Minneapolis

Mississippi
Jackson

Missouri
Branson
Joplin
Kansas City
Springfield
St. Louis

Nebraska
Lincoln
Omaha

New Jersey
Iselin

New York
Long Island
New York City

North Carolina
Asheville
Charlotte SouthPark
Charlotte Uptown
Greensboro
Greenville
Hendersonville
Raleigh
Winston-Salem

Ohio
Cincinnati
Toledo

Oklahoma
Enid
Oklahoma City
Tulsa

Pennsylvania
Fort Washington
Pittsburgh

South Carolina
Charleston
Greenville
Summerville

Tennessee
Knoxville
Memphis
Nashville

Texas
Austin
Dallas
Fort Worth
Houston
San Antonio
Waco

Utah
Salt Lake City

Virginia
Norfolk
Richmond
Tysons

West Virginia
Charleston

Wisconsin
Appleton
Madison

*FY 2025 revenue: period ending 5/31/25.

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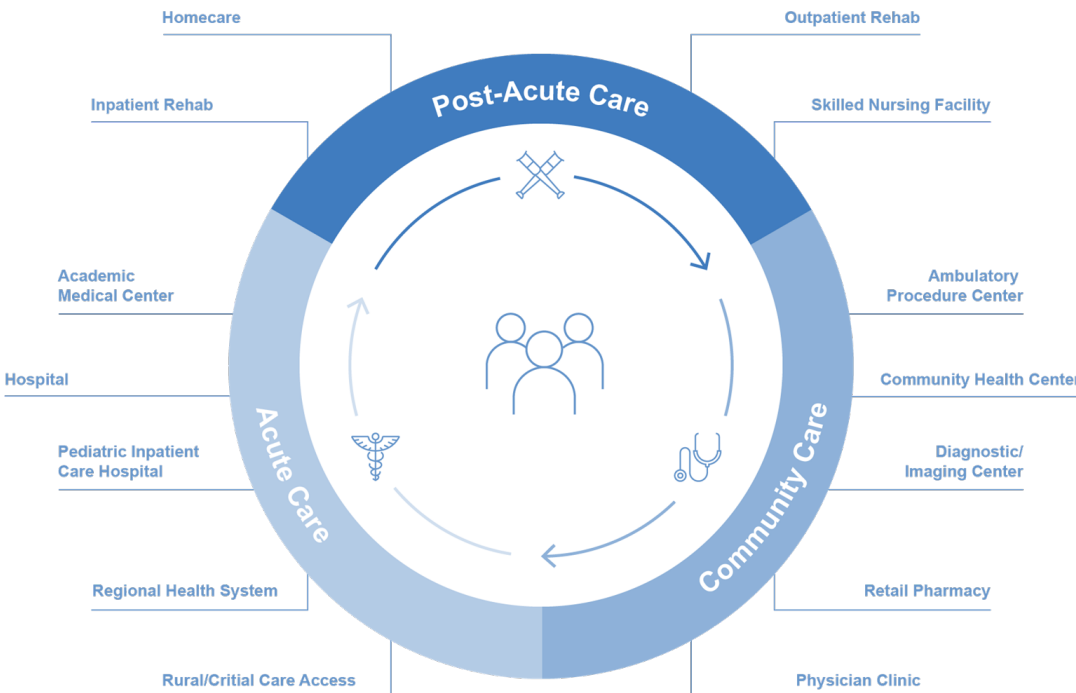
Updated 8/22/2025

Forvis Mazars Healthcare Practice

Forvis Mazars Knows Healthcare

| | | |
|----------------------|-----------------------------|----------------|
| 950+ team members | 6100+ Healthcare clients | 175+ PPMDDs |
|----------------------|-----------------------------|----------------|

Serving the Entire Continuum of Care



90
Healthcare Net Promoter Score

Modern Healthcare

9th
Largest Healthcare Consulting Firm



2nd
Largest Healthcare Auditor



2nd
Largest Healthcare Tax Preparer

Meet the Presenters



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Agenda

1. A Challenging Environment
2. Medicare DSH
3. Uncompensated Care
4. Medicare Bad Debts



Key Reimbursement Opportunities

New York Totals

1. Medicare Disproportionate Share (DSH)

~\$290 Million

2. Medicare Bad Debts

~\$90 Million

3. Uncompensated Care Worksheet S-10

~\$366 Million

“These programs are not commodities; they are strategic reimbursement opportunities.”



A Challenging Environment

Providers Under Pressure

50% of provider executives rank margin improvement as one of their top priorities over the next three to five years.

40% of hospitals had negative margins in 2024

16 hospitals closed in 2025
25 hospitals closed in 2024

338 rural hospitals at risk of closure

Medicare margin for “efficient hospitals” is -2%

78% of physicians employed in 2024

774 nursing homes have closed since 2020

Sources:

- 1) Mindsets Healthcare Executive Leadership Report,” Forvis Mazars, 2024.
- 2) https://www.markey.senate.gov/imo/media/doc/letter_on_rural_hospitals.pdf
- 3) <https://www.fitchratings.com/research/us-public-finance/fitch-revises-sector-outlook-for-us-nfp-hospitals-to-neutral-09-12-2024>
- 4) www.medpac.gov/wp-content/uploads/2024/08/Tab-D-Hospital-payment-adequacy-January-2025-SEC.pdf
- 5) <https://www.beckershospitalreview.com/finance/4-hospital-closures-in-2-weeks/>
- 6) <https://www.beckershospitalreview.com/finance/5-hospital-closures-in-2024.html#:~:text=Becker's%20has%20reported%20on%202025,This%20article%20was%20updated%20Dec.>
- 7) <https://www.beckershospitalreview.com/finance/10-hospitals-closing-departments-or-ending-services-5.html>
- 8) <https://www.physiciansadvocacyinstitute.org/PAI-Research/PAI-Avalere-Study-on-Physician-Employment-Practice-Ownership-Trends-2019-2023>
- 9) <https://www.ahcancal.org/News-and-Communications/Press-Releases/Pages/Report-Access-to-Nursing-Home-Care-is-Worsening-.aspx>

Changes to Medicaid and Exchange eligibility are projected to increase the uninsured by 10 million.

Percentage Point Increase

| Category | Percentage Point Increase |
|----------|---------------------------|
| 1 | 1 |
| 2 | 2 |
| 3 | 3 |
| 4 | 4 |



- Increased income verification requirements (\$37B)
- Limits premium tax credit eligibility for certain SEPs (\$39B)
- Restricts premium tax credit eligibility for non-citizens (\$120B)

OBBBA Medicaid Work Requirements

Implementation Provisions

 **Begin January 1, 2027; States can apply for an extension until December 2028**

 **80 hours per month for Medicaid beneficiaries aged 19 through 64**

- **Community service, educational programs, or job training**

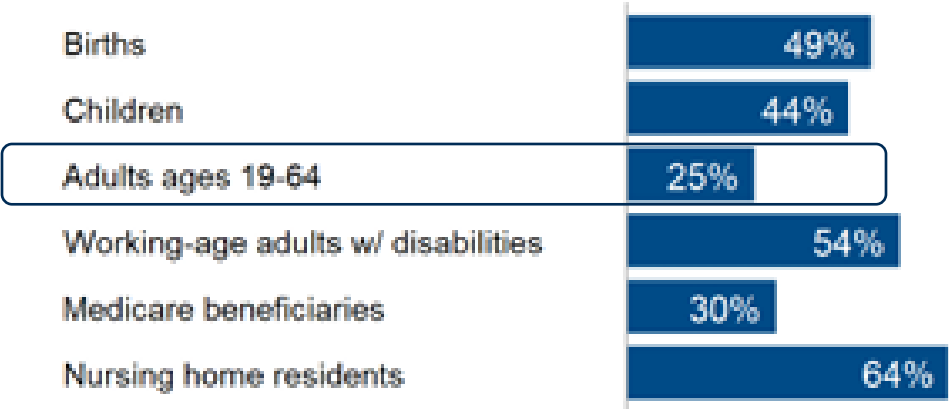
Exemptions

- **Pregnant woman**
- **Individuals with disabilities**
- **Caretakers of children under 14**

Medicaid Enrollment

Nearly 7 Million beneficiaries

In New York, Medicaid covers...

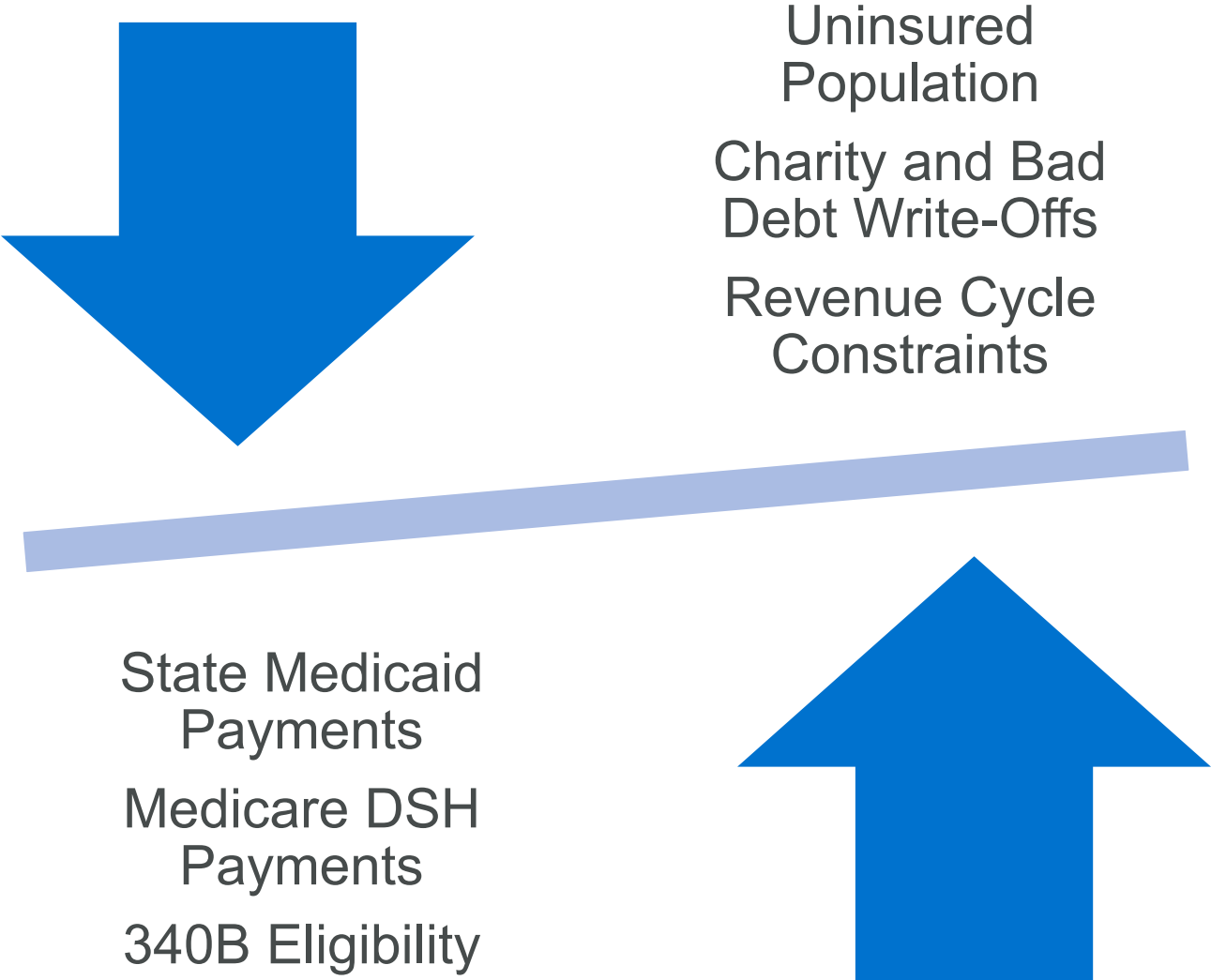


A majority (71%) of Medicaid adults are working in New York



Source: <https://files.kff.org/attachment/fact-sheet-medicaid-state-NY>

OBBBA: Hospital Margin Impact



Medicare Disproportionate Share



Disproportionate Share Hospital (DSH) Program

Established by Congress in 1986

Purpose

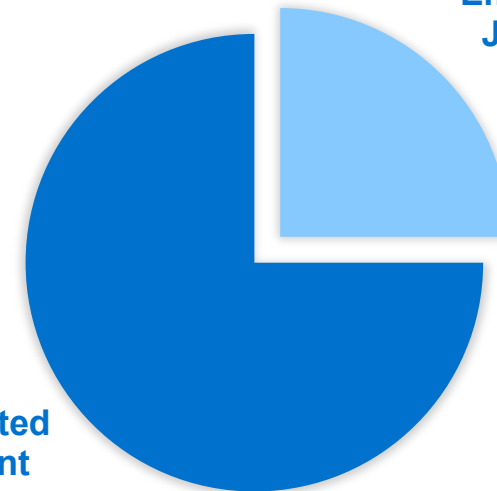
To provide additional reimbursement for hospitals that serve a disproportionate share of low-income patients.

Empirically
Justified
DSH
100%

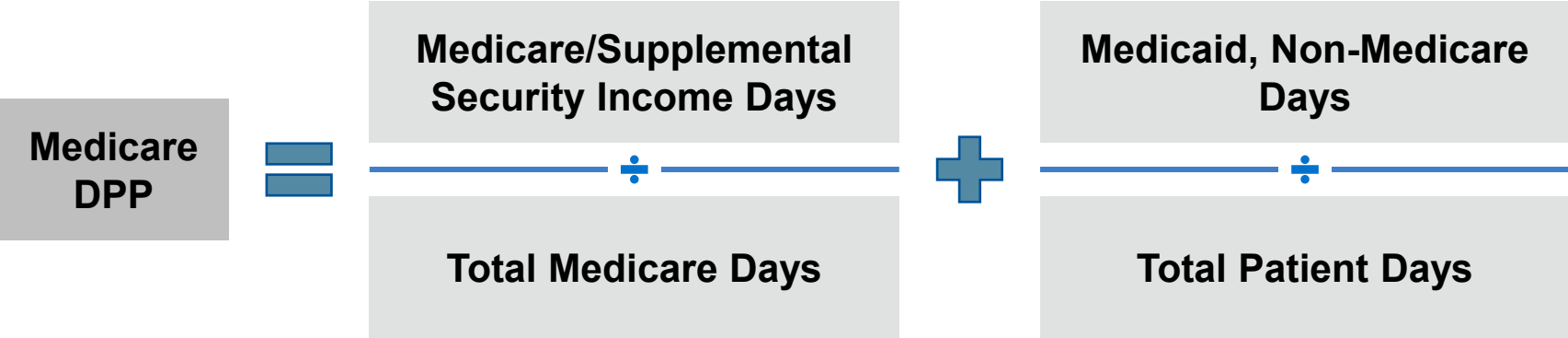
2014

Uncompensated
Care Payment
75%

Empirically
Justified
DSH
25%



Empirically Justified DSH



SSI Fraction

- Entitled to both Medicare Part A & C
- Supplemental Security Income (SSI)

Medicaid Fraction

- Medicaid-eligible patient days
- Not covered under Part A
- Not covered under Part C

340B Eligibility

| | PED | DSH | CAN | CAH | RRC | SCH |
|-------------------------------------|--------|--------|--------|-----|------|------|
| Subject to GPO Prohibition | X | X | X | | | |
| Subject to Orphan Drug Exclusion | | | X | X | X | X |
| Disproportionate Share Adjustment % | >11.75 | >11.75 | >11.75 | | ≥8.0 | ≥8.0 |
| Designated by CMS | X | | | X | X | X |

Medicaid Eligibility

Enrollment Trend



Medicaid/CHIP Enrollment Trend

- **United States** Medicaid/CHIP enrollment rose during the pandemic, peaked in 2023, then declined by ~17% in 2025
 - Still ~10% above pre-pandemic levels.
- **New York**, enrollment of ~6 Million pre-pandemic (early 2020), peaked in 2023 to ~8 Million enrollees and now declined to under 7 Million
 - Still 17% above pre-pandemic levels

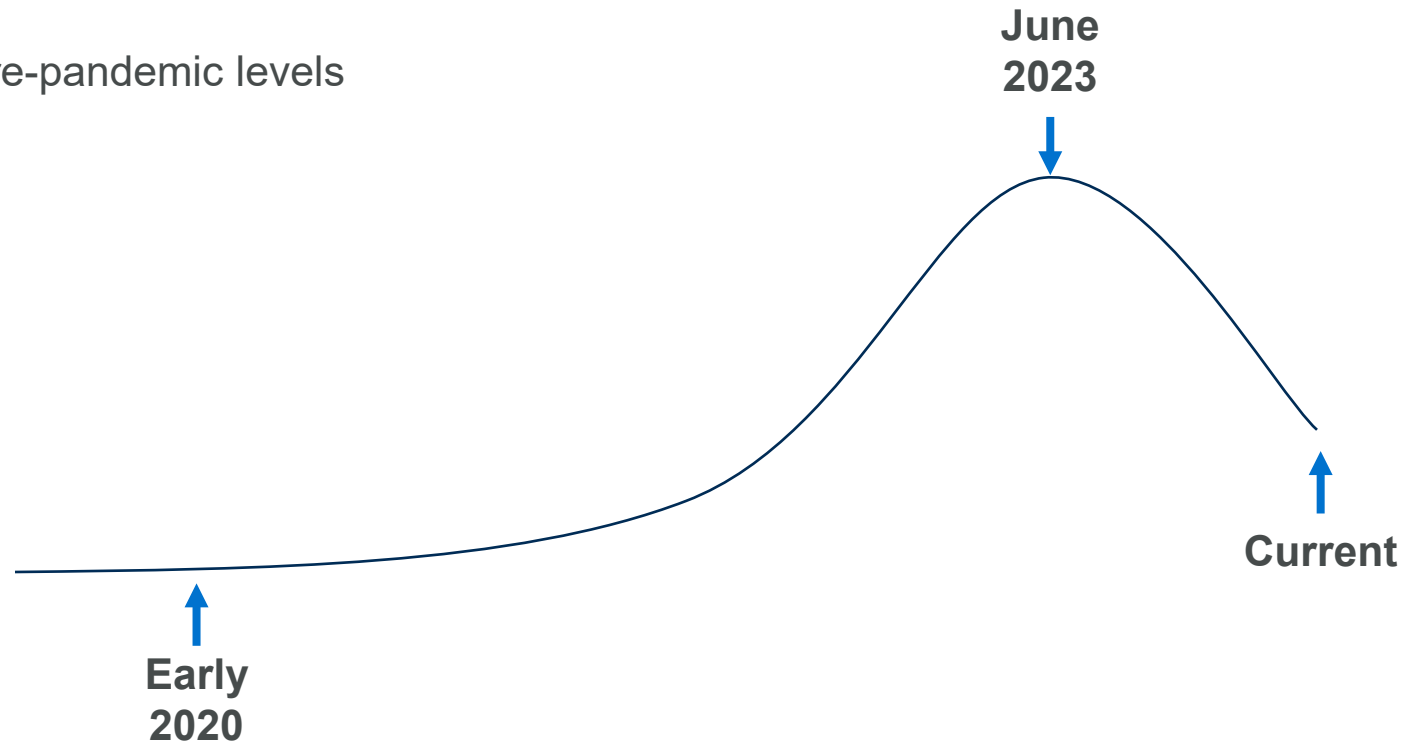


Exhibit 3A – Listing of Medicaid Eligible Days

| | |
|-----------------------|--|
| TITLE | MEDICAID ELIGIBLE DAYS FOR A DSH ELIGIBLE HOSPITAL |
| PROVIDER NAME | |
| CCN | |
| CRP BEGINNING DATE | |
| CRP ENDING DATE | |
| WS S-2, PT. I, LINE # | |
| PREPARED BY | |
| DATE PREPARED | |
| TOTAL COLUMNS 10 &12 | |
| TOTAL COLUMN 11 | |

| PATIENT CLAIM INFORMATION | | | | | MEDICAID NUMBER | STATE ELIGIBILITY CODE | PATIENT POPU- LATION CODE |
|---------------------------|--------------------------|------------------------------|----------------------------|------------------------------|--------------------|------------------------------|------------------------------------|
| PATIENT LAST NAME | PATIENT FIRST NAME | DATE OF SERVICE - FROM | DATE OF SERVICE - TO | PATIENT ACCOUNT NUMBER | | | |
| 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 |
| | | | | | | | |
| | | | | | | | |
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| MEDICAID DAYS | | | | INSURANCE OR OTHER PAYER NAME | | MEDICARE ELIGIBILITY | | | COMMENTS |
|---|------------------|----------------------------------|----------------------|----------------------------------|-----------|----------------------|------------|----------|----------|
| WKST S-2, PART I COLUMN NUMBER | ELIGIBLE DAYS | LABOR & DELIVERY ROOM DAYS | NEWBORN BABY DAYS | PRIMARY | SECONDARY | A/B INDICATOR | START DATE | END DATE | |
| 9 | 10 | 11 | 12 | 13 | 14 | 15 | 16 | 17 | 18 |
| | | | | | | | | | |
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Supplemental Security Income

Background

SSI (Supplemental Security Income) is a U.S. government program that provides **monthly financial assistance** to people who have **low income and limited resources**, and who are:

- **Age 65 or older**, or
 - **Blind**, or
 - **Disabled** (any age, including children)
- **Administered by the Social Security Administration (SSA)**, but **funded by general federal tax revenues**, **not** Social Security taxes.
 - **Purpose:** To help pay for basic needs like **food, clothing, and shelter**.
 - **Eligibility Requirements:**
 - **Income:** Must be very low (varies by state and living situation).
 - **Resources:** Generally, under **\$2,000** for an individual or **\$3,000** for a couple (excludes your home and one car).
 - **Residency:** Must live in the U.S. and be a citizen or eligible non-citizen.
 - **Disability:** Must meet SSA's definition of disability, which involves long-term medical conditions that limit your ability to work.
 - **SSI vs. SSDI:** SSI is **need-based**, while **SSDI (Social Security Disability Insurance)** is based on your **work history** and payroll tax contributions.

Supplemental Security Income

Litigation Update

Supreme Court Case: *Advocate Christ Medical Center v. Kennedy* (formerly *Becerra*)

Background

Over 200 hospitals argued that the **Department of Health & Human Services (HHS)** was under-counting low-income Medicare patients by only counting those who **actually received an SSI cash payment** during their hospital stay. They claimed anyone **entitled to SSI**, regardless of monthly cash receipt, should count—potentially increasing DSH funds by ~\$1.5 billion annually.

Timeline & Litigation:

1. Hospitals filed in 2017 seeking to redesign DSH calculations.
2. The *Provider Reimbursement Review Board*, CMS, D.C. District Court, and the D.C. Court of Appeals sided with HHS.
3. The Supreme Court granted certiorari (June 2024), heard arguments (Nov 2024), and **ruled 7–2 on April 29, 2025.**

Decision Outcome:

The Court held that **only SSI beneficiaries who receive a cash payment in the month of hospitalization** qualify for inclusion in the Medicare DSH formula.

- **Dissenting View:**

Justices **Ketanji Brown Jackson** and **Sonia Sotomayor** argued this interpretation undermines Congress’s intent, ignoring non-cash benefits and ongoing entitlement during months without payment.

Medicare Disproportionate Share

Best Practices

Medicaid Identification

- Apply for Medicaid early in the revenue cycle
- Thorough eligibility testing in home state and out-of-states
- Interim Medicaid monitoring
- Many search iterations and capabilities

Total Day reporting

- Ensure accurate reporting of total days
- Reconcile census reports to revenue and usage detail
- Exclude observation and days without room charges

Utilization Review

- Identify trends in Medicaid and non-Medicaid utilization by department, service line, admitting physician, etc.
- Provider number structuring
- Acute vs. exempt units

Appeals & Litigation

- Stay current on Medicaid day and SSI appeals
- Keep documentation support for audit readiness

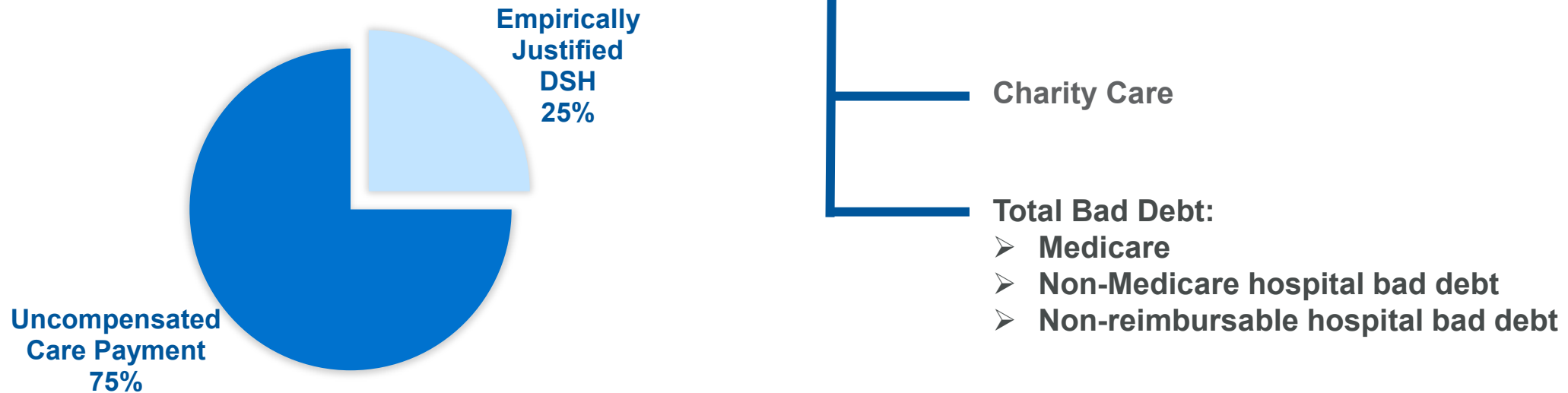
Uncompensated Care S-10



Uncompensated Care Costs

Worksheet S-10

Used in the computation of Factor 3 to distribute uncompensated care payments to all eligible hospitals, except Puerto Rico hospitals and Indian Health Service and Tribal hospitals.



FY 2026 IPPS FINAL RULE

Factor 1 –
Estimated DSH
(75% of empirical
DSH)

- FFY 2024 = \$10,015,191,022
- FFY 2025 = \$10,509,750,000
- FFY 2026 = \$12,412,500,000

Factor 2 – Impacted
by estimate of
national rate of
uninsured

- FFY 2024 = 59.29%
- FFY 2025 = 54.29%
- FFY 2026 = 62.14%

Uncompensated
Care Pool – to be
distributed

- FFY 2024 = \$5,938,006,757
- FFY 2025 = \$5,705,743,275
- FFY 2026 = \$7,713,127,500

Computing the Uncompensated Care DSH Pool

FY 2026 IPPS FINAL RULE

Future uncompensated care payments will be based on:



FY2024

Factor 3 =
Average of
FY2018,
FY2019, and
FY2020
Reports



FY2025

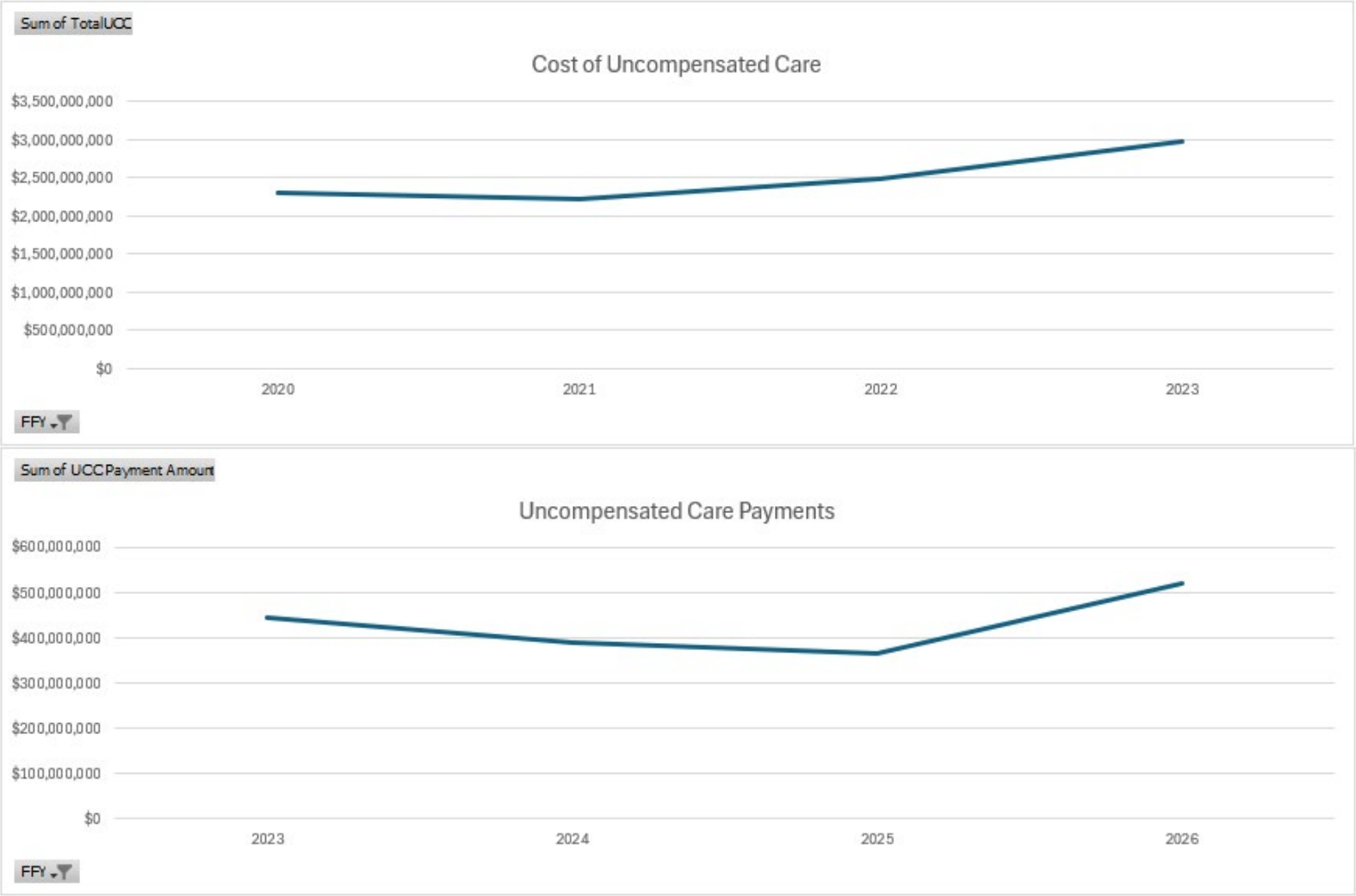
Factor 3 =
Average of
FY2019,
FY2020, and
FY2021
Reports



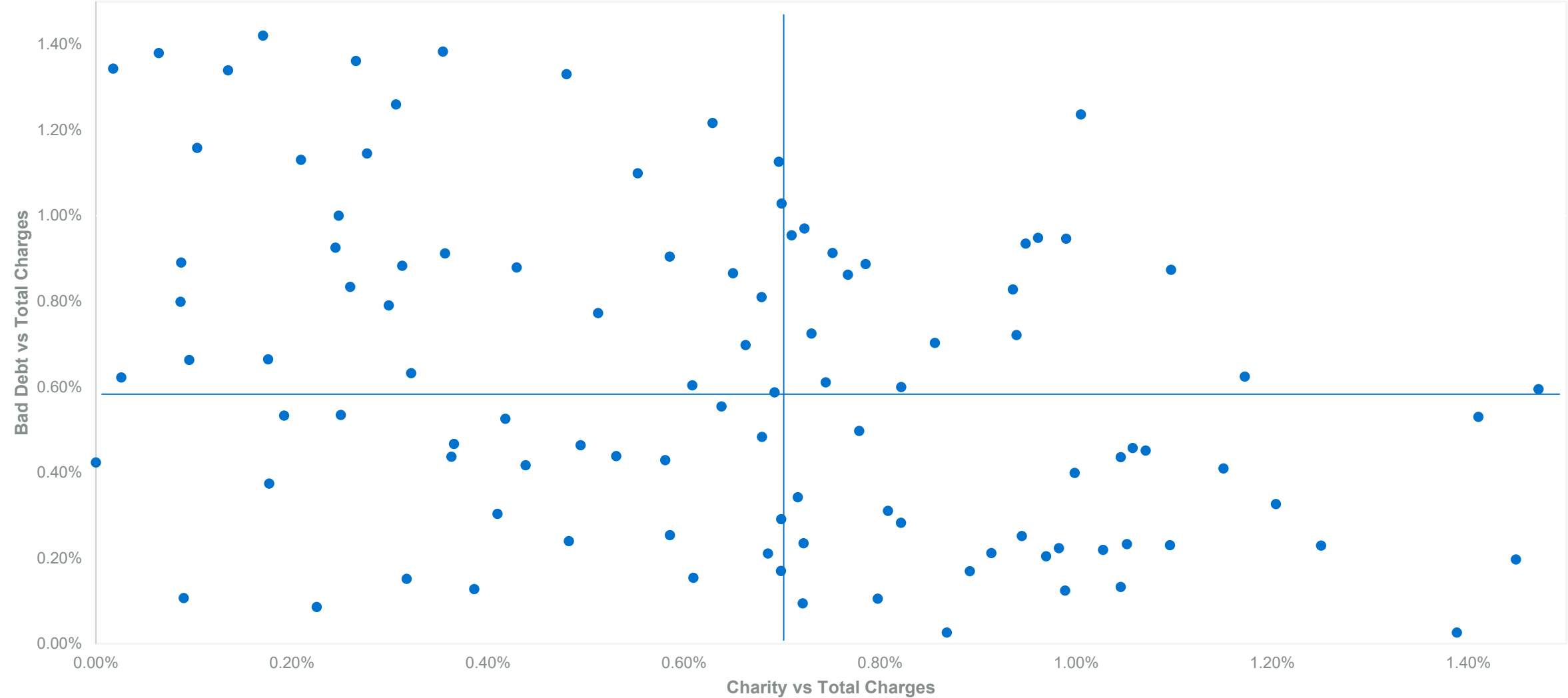
FY2026

Factor 3 =
Average of
FY2020,
FY2021, and
FY2022
Reports

Trending NY Hospital UCC vs Payments



Trending NY Hospitals Charity & Bad Debt

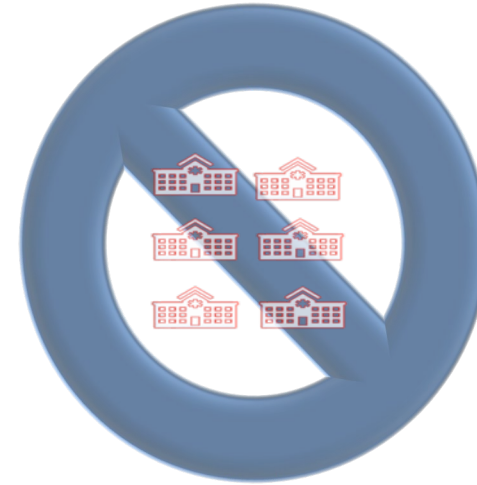


Transmittal 18 – Worksheet S-10



S-10 PART I

Total Hospital Complex
Including Psych Unit, SNF, HHA, etc.



S-10 PART II

Limited to services billed under Hospital
Provider number

Exhibit 3B – Worksheet S-10 Charity

| | |
|---------------------|----------------------|
| TITLE | CHARITY CARE CHARGES |
| PROVIDER NAME | |
| HOSPITAL CCN | |
| COMPONENT CCN | |
| CRP BEGINNING DATE | |
| CRP ENDING DATE | |
| PREPARED BY | |
| DATE PREPARED | |
| UNINSURED COLUMN 20 | |
| INSURED COLUMN 20 | |

| PATIENT CLAIM INFORMATION | | | | | INSURANCE STATUS | PRIMARY PAYOR | SECONDARY PAYOR | TOTAL CHARGES FOR CLAIM | PHYSICIAN / PROFES- SIONAL CHARGES | DEDUCT- IBLE / COINSUR / COPAY AMOUNTS |
|---------------------------|----------------------------|------------------------------|----------------------------|------------------------------|---------------------|------------------|--------------------|----------------------------------|---|--|
| PATIENT NAME - LAST | PATIENT NAME - FIRST | DATE OF SERVICE - FROM | DATE OF SERVICE - TO | PATIENT ACCOUNT NUMBER | | | | | | |
| 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | 11 |
| | | | | | | | | | | |
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| TOTAL THIRD PARTY PAYMENTS | INSURED CONTRAC- TUAL ALLOWANCE AMOUNT | OTHER NON- ALLOWABLE AMOUNTS | TOTAL PATIENT PAYMENTS | AMOUNTS WRITTEN OFF AS BAD DEBT | UNINSURED DISCOUNT AMOUNTS | CHARITY CARE NON- COVERED CHARGES | OTHER CHARITY CARE CHARGES | AMOUNTS WRITTEN OFF TO CHARITY CARE AND UNINSURED DISCOUNTS | WRITE OFF DATE |
|-------------------------------------|--|------------------------------------|------------------------------|--|----------------------------------|---|-------------------------------------|---|-------------------|
| 12 | 13 | 14 | 15 | 16 | 17 | 18 | 19 | 20 | 21 |
| | | | | | | | | | |
| | | | | | | | | | |
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Exhibit 3B – Worksheet S-10 Charity

| COLUMN 11 Deduct./Coins./Copay | COLUMN 6 Insurance Status | COLUMN 13 Contractual Allowance Amount | COLUMN 16 Bad Debt Write-Off |
|---|--|---|---|
| <ul style="list-style-type: none">• Deductible & coinsurance must be separately identified• This could create issues during data retrieval | <ul style="list-style-type: none">• Options are uninsured (1), insured (3), & insured not covered (2)<ul style="list-style-type: none">▪ Includes no contractual relationship, exhausted benefits, non-covered, etc. | <ul style="list-style-type: none">• Required only for insured and insured not covered accounts. | <ul style="list-style-type: none">• Report amount written-off A/R in the system regardless of the date. |

CHARITY CARE CHARGES

- **Uninsured**
 - Reduced to cost
 - Exhausted benefits
- **Insured**
 - Coinsurance, copay, deductible

| Worksheet S-10 | Included |
|-------------------------|----------|
| Charity Care | ✓ |
| Courtesy Discounts | ✗ |
| Uninsured Discounts | ✓ |
| Non-Contract | ✓ |
| Presumptive Eligibility | ✓ |
| COVID Adjustments | ✗ |

Exhibit 3B

Worksheet S-10 Example

INSURED NOT COVERED CASE STUDY:

- Patient D is insured but has exhausted their benefits. The hospital’s financial assistance policy states that patients whose benefits are exhausted are covered under the policy. As such the hospital writes the account off to zero.

| 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 |
|-------------------|--------------------|-----------------------|---------------------|------------------------|------------------|---------------|-----------------|-------------------------|----------------------------------|
| PATIENT NAME LAST | PATIENT NAME FIRST | DATE OF SERVICE: FROM | DATE OF SERVICE: TO | PATIENT ACCOUNT NUMBER | INSURANCE STATUS | PRIMARY PAYOR | SECONDARY PAYOR | TOTAL CHARGES FOR CLAIM | PHYSICIAN / PROFESSIONAL CHARGES |
| Doe | Jill | 5/1/2023 | 5/3/2023 | 123456789 | 2 | ANTHEM | SELF PAY | \$24,566.00 | \$0.00 |

| 11 | 12 | 13 | 14 | 15 | 16 | 17 | 18 | 19 | 20 |
|--|----------------------------|--------------------------------------|-----------------------------|------------------------|---------------------------------|----------------------------|----------------------------------|----------------------------|---|
| DEDUCTIBLE / COINSURANCE / COPAY AMOUNTS | TOTAL THIRD-PARTY PAYMENTS | INSURED CONTRACTUAL ALLOWANCE AMOUNT | OTHER NON-ALLOWABLE AMOUNTS | TOTAL PATIENT PAYMENTS | AMOUNTS WRITTEN OFF AS BAD DEBT | UNINSURED DISCOUNT AMOUNTS | CHARITY CARE NON-COVERED CHARGES | OTHER CHARITY CARE CHARGES | AMOUNTS WRITTEN OFF TO CHARITY CARE AND UNINSURED DISCOUNTS |
| \$0.00 | \$0.00 | \$17,933.00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 | \$6,633.00 | \$0.00 | \$6,633.00 |

Exhibit 3C - Worksheet S-10 Bad Debts

| | |
|--------------------|-----------------|
| TITLE | TOTAL BAD DEBTS |
| PROVIDER NAME | |
| HOSPITAL CCN | |
| COMPONENT CCN | |
| CRP BEGINNING DATE | |
| CRP ENDING DATE | |
| PREPARED BY | |
| DATE PREPARED | |
| TOTAL COLUMN 17 | |

| PATIENT CLAIM INFORMATION | | | | | INSURANCE STATUS | PRIMARY PAYOR | SECONDARY PAYOR |
|---------------------------|-----------------------|---------------------------|------------------------|------------------------|---------------------|------------------|--------------------|
| PATIENT LAST NAME | PATIENT FIRST NAME | DATE OF SERVICE - FROM | DATE OF SERVICE -TO | PATIENT ACCT NUMBER | | | |
| 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 |
| | | | | | | | |
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| SERVICE INDICATOR (IP / OP) | TOTAL CHARGES | TOTAL PHYS- ICIAN / PROFES- SIONAL CHGS | TOTAL PATIENT PAYMENTS | TOTAL THIRD PARTY PAYMENTS | PATIENT CHARITY CARE AMOUNT | CONTRACTUAL ALLOWANCE / OTHER AMOUNT | A/R WRITE OFF DATE | PATIENT BAD DEBT WRITE OFF AMOUNT |
|-----------------------------------|------------------|---|------------------------------|----------------------------------|-----------------------------------|--|--------------------------|---|
| 9 | 10 | 11 | 12 | 13 | 14 | 15 | 16 | 17 |
| | | | | | | | | |
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NAVIGATING THE AUDIT



POLICY REVIEW

Charity Care

- What is the criteria for approval, and does it reconcile to the data?
 - Automatic 100% adjustment
 - Sliding scale
 - Non-covered Medicaid
 - Non-contracted insurance

Financial Assistance Policy (FAP)

- Applies to patients unable to meet financial obligation
- May apply to uninsured, underinsured, ineligible for government assistance, or unable to pay

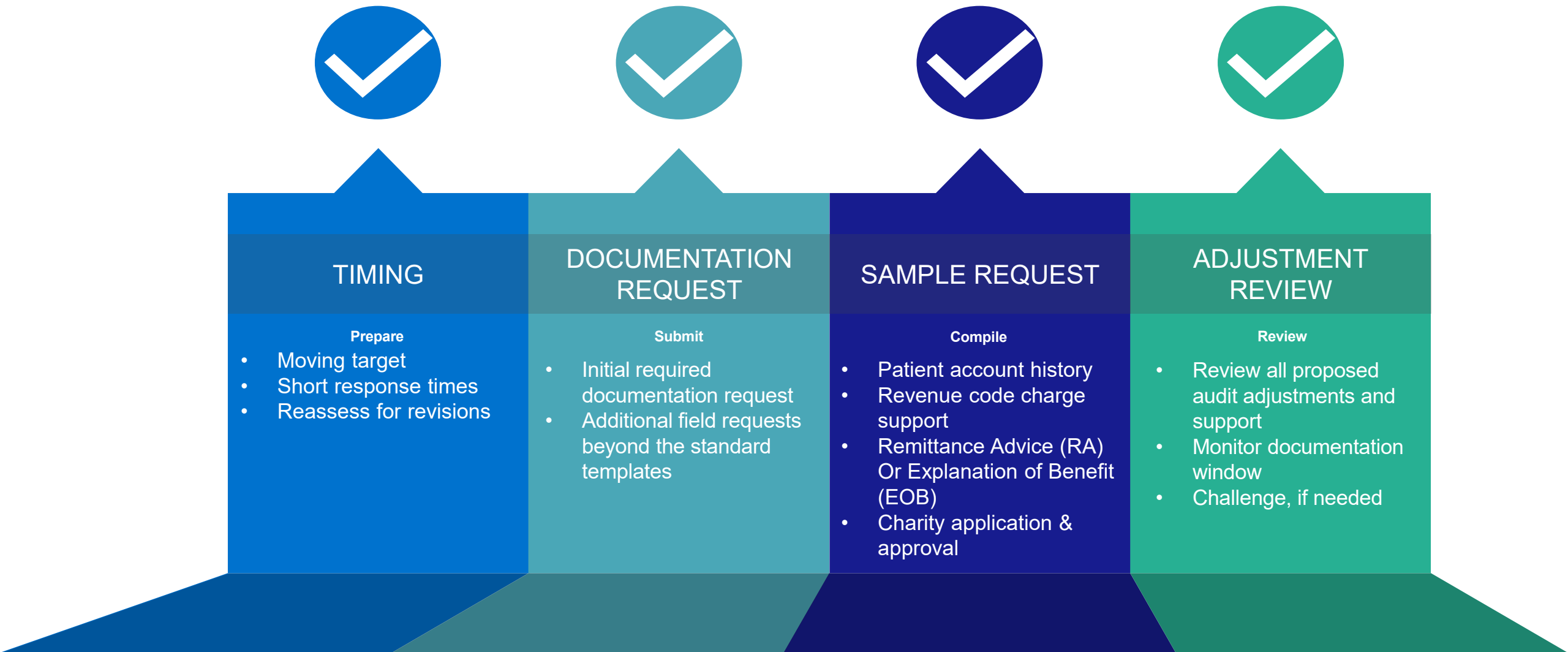
Uninsured Discount

- Confirmation of insurance status
- Is the discount automatic?
- Percent of charges applied
- How does it compare to the AGB%?

Bad Debt

- What criteria is applied
- Medicare policies are also important, but not part of S-10 audit

S-10 AUDIT PREPARATION



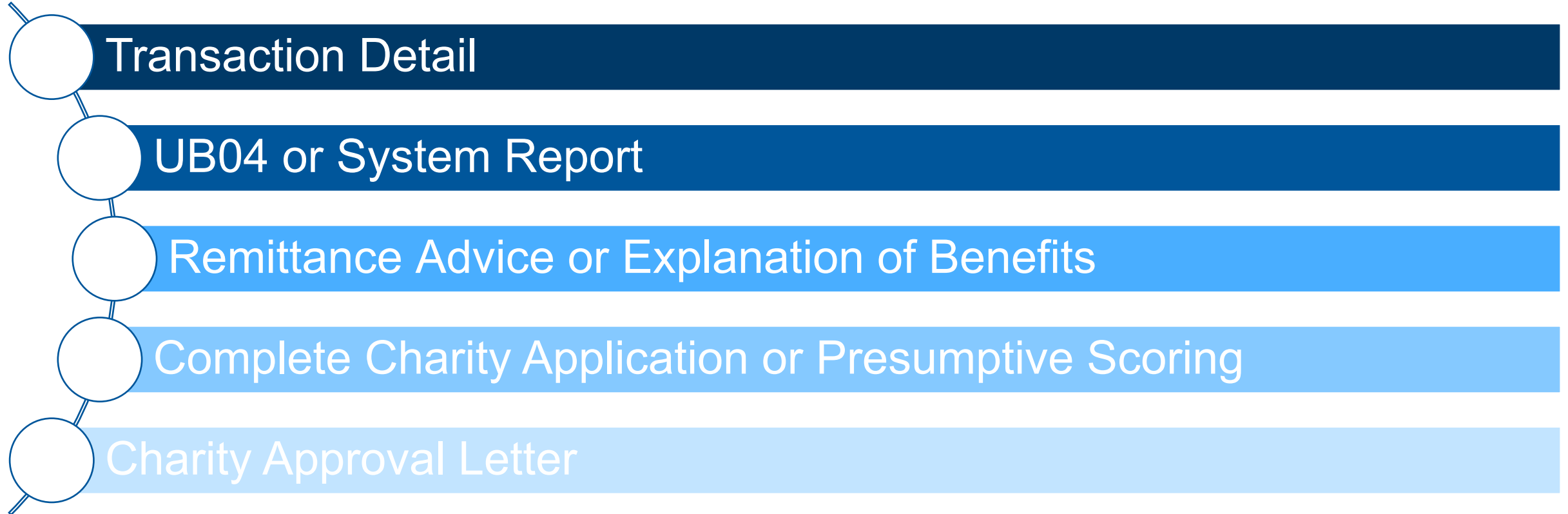
S-10 AUDIT PREPARATION

Typical auditor request includes:

- Charity, FAP, and self-pay discount policies (in force during FY)
- Audited financial statements and working trial balance (may ask for prior-year as well)
- Bad debt reconciliation
- Charity reconciliation
- List of transaction codes with descriptions
- Detailed query logic for lines 20, 22, and 26
- Detailed Charity listing – includes rev code detail (if applicable)
- Detailed Bad Debt listing – includes Medicare crossovers, indigent, and rev code detail (if applicable)
- Query logic methodology questionnaire



S-10 AUDIT SAMPLE DOCUMENTATION REVIEW



Medicare Bad Debts



New York Medicare Bad Debt Trending

| Year | Deduct/Coins | Total Bad Debt | Total Crossover |
|-------------|-----------------|----------------|-----------------|
| 2019 | \$1,277,012,265 | \$105,517,125 | \$65,463,182 |
| 2020 | \$1,123,537,803 | \$96,200,608 | \$50,301,361 |
| 2021 | \$1,233,317,859 | \$81,499,658 | \$38,354,743 |
| 2022 | \$1,292,252,202 | \$99,479,300 | \$53,586,988 |
| 2023 | \$1,354,934,895 | \$84,432,144 | \$48,183,622 |
| Grand Total | \$6,281,055,024 | \$467,128,835 | \$255,889,896 |

BAD DEBT TYPES



Agency Returned Bad Debts

Non-indigent Medicare beneficiaries
Not Medicaid eligible and not determined indigent by provider's customary methods
Follows the provider's typical collection process outlined in the policy



Crossover Medicare Bad Debts

Dual eligible Medicare beneficiaries, eligible for Medicare and Medicaid
Reasonable collection efforts involve billing the State Medicaid plan, not the patient



Indigent Medicare Bad Debts

Indigent non-dual eligible Medicare beneficiaries
Indigence is determined by the provider, not Medicaid eligible
Follows the provider's financial assistance policy

Excerpt from FY 2021 IPPS Final Rule:

“... we believe that as we clarify and codify these longstanding bad debt policies, it is important to set forth the definition of each of these three beneficiary categories so that it is clear which bad debt collection effort policy applied, and continue to apply, to each.”

Exhibit 2A – Medicare Bad Debts

| | |
|------------------------|--------------------|
| TITLE | MEDICARE BAD DEBTS |
| PROVIDER NAME | |
| CCN | |
| SUBPROVIDER CCN | |
| CRP BEGINNING DATE | |
| CRP ENDING DATE | |
| INPATIENT / OUTPATIENT | |
| PREPARED BY | |
| DATE PREPARED | |
| TOTAL COLUMN 23 | |
| TOTAL DUAL ELIGIBLE | |

| | | | | | | | | | | | | |
|-------------------|--------------------|-----------------------|---------------------|------------------------|-------------|------------------|--------------------------|----------------------------------|----------------------------------|-----------------------------------|-------------------------------------|------------------------------|
| PATIENT NAME LAST | PATIENT NAME FIRST | DATE OF SERVICE: FROM | DATE OF SERVICE: TO | PATIENT ACCOUNT NUMBER | MBI OR HICN | MEDI-CAID NUMBER | PROVIDER DEEMED INDIGENT | MEDI-CARE REMITTANCE ADVICE DATE | MEDI-CAID REMITTANCE ADVICE DATE | SEC-ONDARY PAYER RA RECEIVED DATE | BENE-FICIARY RESPON-SIBILITY AMOUNT | DATE FIRST BILL SENT TO BENE |
| 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | 11 | 12 | 13 |
| | | | | | | | | | | | | |
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| | | | | | | | | | | | |
|--------------------|----------------------------------|-------------------------------------|--------------------------------|--------------------------|-----------------------------------|--------------------------------|-------------------------------|---------------------------------|--------------------------------------|-----------------------------|----------|
| A/R WRITE OFF DATE | SENT TO COLLEC-TION AGENCY (Y/N) | RETURN FROM COLLEC-TION AGENCY DATE | COLLEC-TION EFFORT CEASED DATE | MEDI-CARE WRITE OFF DATE | RECOVER-IES ONLY: AMOUNT RECEIVED | RECOVER-IES ONLY: MCR FYE DATE | MEDI-CARE DE-DUCTIBLE AMOUNT* | MEDI-CARE CO-INSUR-ANCE AMOUNT* | PAYMENTS RECEIVED PRIOR TO WRITE-OFF | ALLOW-ABLE BAD DEBTS AMOUNT | COMMENTS |
| 14 | 15A | 15 | 16 | 17 | 18 | 19 | 20 | 21 | 22 | 23 | 24 |
| | | | | | | | | | | | |
| | | | | | | | | | | | |
| | | | | | | | | | | | |

Exhibit 2A – Medicare Bad Debts

ADDITIONAL FIELDS REQUIRED

- Medicaid RA date
- Secondary payer RA date
- A/R write-off date
- Date returned from collection agency
- Collection effort cease date
- Beneficiary responsible amount
- Recovery detail

COLUMN 14 A/R Write-Off Date

- Date in which the account is transferred out of active A/R
- May be difficult to identify in some provider EHR systems

Exhibit 2A

Medicare Bad Debts Example

TRADITIONAL CASE STUDY:

- Patient A has Medicare and owes their \$1,408 deductible for the most recent stay at your hospital. The hospital collects on this patient for at least 120 days, deems the account uncollectible, and writes off the account balance to zero on 8/7/2023.

| 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | 11 | 12 |
|-------------------|--------------------|-----------------------|---------------------|------------------------|-------------|-----------------|--------------------------|---------------------------------|---------------------------------|----------------------------------|-----------------------------------|
| PATIENT NAME LAST | PATIENT NAME FIRST | DATE OF SERVICE: FROM | DATE OF SERVICE: TO | PATIENT ACCOUNT NUMBER | MBI OR HICN | MEDICAID NUMBER | PROVIDER DEMMED INDIGENT | MEDICARE REMITTANCE ADVICE DATE | MEDICAID REMITTANCE ADVICE DATE | SECONDARY PAYER RA RECEIVED DATE | BENEFICIARY RESPONSIBILITY AMOUNT |
| Doe | Jane | 4/1/2021 | 4/3/2021 | 123456789 | Z0S55S531 | | N | 4/17/2021 | | | \$1,408.00 |

| 13 | 14 | 15A | 15 | 16 | 17 | 18 | 19 | 20 | 21 | 22 | 23 |
|------------------------------|--------------------|---------------------------------|------------------------------------|-------------------------------|-------------------------|----------------------------------|-------------------------------|----------------------------|-----------------------------|--------------------------------------|----------------------------|
| DATE FIRST BILL SENT TO BENE | A/R WRITE-OFF DATE | SENT TO COLLECTION AGENCY (Y/N) | RETURN FROM COLLECTION AGENCY DATE | COLLECTION EFFORT CEASED DATE | MEDICARE WRITE-OFF DATE | RECOVERIES ONLY: AMOUNT RECEIVED | RECOVERIES ONLY: MCR FYE DATE | MEDICARE DEDUCTIBLE AMOUNT | MEDICARE COINSURANCE AMOUNT | PAYMENTS RECEIVED PRIOR TO WRITE-OFF | ALLOWABLE BAD DEBTS AMOUNT |
| 5/2/2021 | 8/30/2021 | Y | 8/5/2023 | 8/5/2023 | 8/7/2023 | | | \$1,408.00 | \$0.00 | \$200.00 | \$1,208.00 |

Exhibit 2A

Medicare Bad Debts Example

CROSSOVER CASE STUDY:

- Patient B has Medicare with Medicaid as a secondary payer. They have a \$1,408 deductible for their most recent stay at your hospital. The hospital bills Medicaid for the deductible and Medicaid pays \$108. Remaining balance is written-off to an implicit price concession on 8/7/2023.

| 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | 11 | 12 |
|-------------------|--------------------|-----------------------|---------------------|------------------------|-------------|-----------------|--------------------------|---------------------------------|---------------------------------|----------------------------------|-----------------------------------|
| PATIENT NAME LAST | PATIENT NAME FIRST | DATE OF SERVICE: FROM | DATE OF SERVICE: TO | PATIENT ACCOUNT NUMBER | MBI OR HICN | MEDICAID NUMBER | PROVIDER DEMMED INDIGENT | MEDICARE REMITTANCE ADVICE DATE | MEDICAID REMITTANCE ADVICE DATE | SECONDARY PAYER RA RECEIVED DATE | BENEFICIARY RESPONSIBILITY AMOUNT |
| Doe | John | 4/1/2023 | 4/3/2023 | 123456789 | Z0S55S531 | ZZZ7894123 | N | 4/17/2023 | 5/5/2023 | | \$0.00 |

| 13 | 14 | 15A | 15 | 16 | 17 | 18 | 19 | 20 | 21 | 22 | 23 |
|------------------------------|--------------------|---------------------------------|------------------------------------|-------------------------------|-------------------------|----------------------------------|-------------------------------|----------------------------|-----------------------------|--------------------------------------|----------------------------|
| DATE FIRST BILL SENT TO BENE | A/R WRITE-OFF DATE | SENT TO COLLECTION AGENCY (Y/N) | RETURN FROM COLLECTION AGENCY DATE | COLLECTION EFFORT CEASED DATE | MEDICARE WRITE-OFF DATE | RECOVERIES ONLY: AMOUNT RECEIVED | RECOVERIES ONLY: MCR FYE DATE | MEDICARE DEDUCTIBLE AMOUNT | MEDICARE COINSURANCE AMOUNT | PAYMENTS RECEIVED PRIOR TO WRITE-OFF | ALLOWABLE BAD DEBTS AMOUNT |
| | 8/7/2023 | N | | 8/7/2023 | 8/7/2023 | | | \$1,408.00 | \$0.00 | \$108.00 | \$1,300.00 |

Going Forward

Takeaways

Best Practices

- Data harmony
 - All three projects utilize the same datasets. Keep these teams connected to ensure consistent and accurate reporting
 - Increases efficiencies and lowers cost
- Recurring reimbursement + revenue cycle meetings
 - This should be a strong relationship to reduce opportunities for lost revenue
- Don't go at it alone
 - Lean on industry experts – these topics continue to evolve and are increasingly scrutinized
- Perform periodic mock audits throughout the year
 - Identify process gaps that can be corrected prior to year-end

Common Pitfalls

- Not aligning practices with policies
- Lack of education between patient access, middle revenue cycle, and reimbursement
- Revising policies for one objective and negatively impacting an unrelated reimbursement item
- Purging documentation, particularly with system conversions
- Assigning responsibility/ownership of compiling listing to staff that are unaware of audit requirements or cost reporting instructions
- Not performing necessary reconciliations
- Doing what has always been done in the past

Questions?





Thank you!

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