# TOBACCO SETTLEMENT PROGRAM

# Lancaster General Hospital

## Tobacco Settlement Payment Data Review

## Year 2019

October 2018

Commonwealth of Pennsylvania
Department of the Auditor General

Eugene A. DePasquale • Auditor General

**Commonwealth of Pennsylvania**
**Department of the Auditor General**
**Harrisburg, PA 17120-0018**
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**EUGENE A. DePASQUALE**
**AUDITOR GENERAL**

October 24, 2018

Mr. Joe Byorick
Chief Financial Officer
Lancaster General Hospital
555 North Duke Street
P.O. Box 3555
Lancaster, PA 17604

Re: Lancaster General Hospital

Dear Mr. Byorick:

The Tobacco Settlement Act of June 26, 2001 (P.L. 755, No. 77), as amended, 35 P.S. § 5701.101 et seq., mandated the Department of Human Services (DHS) to make payments to hospitals for a portion of uncompensated care services provided by these facilities. Hospitals that qualify can receive payments using either an uncompensated care approach or an extraordinary expense approach. The uncompensated care score of each hospital is determined by using three-year averages from five main data elements (for a total of fifteen data elements). These data elements are uncompensated care costs, net patient revenues, Medicare supplemental security income (Medicare SSI) days, Medical Assistance (MA) days and total inpatient days. A hospital qualifies for an extraordinary expense payment based on their number of qualified claims. Qualified claims are those claims in which the cost of the claim exceeds twice the average cost of all claims for that particular facility and for which the hospital provided inpatient services to an uninsured patient.

At the request of the DHS, the Department of the Auditor General performed a review[1] of Lancaster General Hospital's records to substantiate the claims data and days data it submitted to the Pennsylvania Health Care Cost Containment Council (PHC4) and the DHS, respectively.

The purpose of our review was to determine whether this facility could substantiate its fiscal year ended June 30, 2017 reported claims and verify whether corresponding patients were uninsured and the facility received no compensation from third party payers such as Medicare, Medicaid, or Blue Cross. Payments made by the patients themselves toward their financial

[1] This review was not required to be and was not conducted in accordance with professional auditing or attestation standards.

obligations may have reduced the allowable costs of the respective claim when determining eligibility. We also determined whether this facility could substantiate total MA days as reported on its submitted MA-336 cost reports for the fiscal years ended June 30, 2015 and June 30, 2016.

The results of our review are as follows:

**For Reported Claims:**

Based on the PHC4 claims database for the fiscal year ended June 30, 2017, the facility reported 62 potentially eligible extraordinary expense claims, totaling $7,399,110.21, for review. We reviewed 38 of these reported claims, representing at least 75% of the hospital's total dollar value of reported claims.[2] The results of our review disclosed that 27 of the 38 reported potentially eligible extraordinary expense claims met the criteria to qualify as extraordinary expense claims. The chart below details our results and explains any adjustments that should be made to the PHC4 Database. Since we determined that 27 of the reported claims submitted by the facility qualify as extraordinary expense claims, this facility could be eligible for payment under the extraordinary expense method for the 2019 Tobacco Settlement Payment Year.

| Claim No. | Originally Reported Total Charges | Substantiated Total Charges Based on Account Notes | Patient Payments Applied to Account | Qualify (Y/N) – Reason for Not Qualifying | Adjustment(s) Needed |
|---|---|---|---|---|---|
| 1 | $447,598.82 | $0 | $0 | N – Paid by MA | Claim should be removed from self-pay listing |
| 2 | $313,902.70 | $309,249.70 | $0 | Y | An adjustment is needed to total charges |
| 3 | $279,727.95 | $279,727.95 | $0 | Y | N/A |
| 4 | $272,403.80 | $272,403.80 | $0 | Y | N/A |
| 5 | $252,222.65 | $252,032.65 | $0 | Y | An adjustment is needed to total charges |
| 6 | $246,517.65 | $245,947.65 | $0 | Y | An adjustment is needed to total charges |
| 7 | $230,062.27 | $229,492.27 | $0 | Y | An adjustment is needed to total charges |
| 8 | $186,108.20 | $0 | $0 | N – Paid by MA | Claim should be removed from self-pay listing |

[2] The facility is responsible for self-reviewing the remaining claims during the PHC4 "open window" period, as done in prior years.

| Claim No. | Originally Reported Total Charges | Substantiated Total Charges Based on Account Notes | Patient Payments Applied to Account | Qualify (Y/N) – Reason for Not Qualifying | Adjustment(s) Needed |
|---|---|---|---|---|---|
| 9 | $168,089.55 | $311,177.55 | $45,120.75 | Y | An adjustment is needed to total charges |
| 10 | $167,397.75 | $0 | $0 | N - Not a self-pay claim | Claim should be removed from self-pay listing |
| 11 | $155,414.35 | $155,414.35 | $0 | Y | N/A |
| 12 | $147,235.25 | $147,235.25 | $0 | Y | N/A |
| 13 | $129,897.55 | $0 | $0 | N – Still an active account | Claim should be removed from self-pay listing |
| 14 | $127,994.95 | $127,804.95 | $0 | Y | An adjustment is needed to total charges |
| 15 | $127,300.08 | $127,300.08 | $0 | Y | N/A |
| 16 | $119,444.75 | $119,444.75 | $0 | Y | N/A |
| 17 | $117,658.37 | $117,658.37 | $0 | Y | N/A |
| 18 | $116,769.41 | $116,769.41 | $0 | Y | N/A |
| 19 | $114,182.00 | $0 | $0 | N – Paid by patient | Claim should be removed from self-pay listing |
| 20 | $112,516.55 | $112,516.55 | $0 | Y | N/A |
| 21 | $110,637.25 | $178,929.25 | $25,944.74 | Y | An adjustment is needed to total charges |
| 22 | $108,696.95 | $108,696.95 | $0 | Y | N/A |
| 23 | $108,465.10 | $108,465.10 | $0 | Y | N/A |
| 24 | $107,171.95 | $107,171.95 | $31,079.87 | Y | N/A |
| 25 | $105,896.40 | $105,896.40 | $30,709.96 | Y | N/A |
| 26 | $103,396.05 | $0 | $0 | N – Paid by insurance | Claim should be removed from self-pay listing |
| 27 | $96,387.35 | $96,387.35 | $0 | Y | N/A |
| 28 | $95,028.35 | $95,028.35 | $0 | Y | N/A |
| 29 | $93,447.20 | $93,447.20 | $0 | Y | N/A |
| 30 | $92,333.32 | $92,333.32 | $13,388.33 | Y | N/A |
| 31 | $91,545.30 | $0 | $0 | N – Still an active account | Claim should be removed from self-pay listing |
| 32 | $88,777.77 | $0 | $0 | N – Paid by MA | Claim should be removed from self-pay listing |

| Claim No. | Originally Reported Total Charges | Substantiated Total Charges Based on Account Notes | Patient Payments Applied to Account | Qualify (Y/N) – Reason for Not Qualifying | Adjustment(s) Needed |
|---|---|---|---|---|---|
| 33 | $88,583.71 | $88,203.71 | $0 | Y | An adjustment is needed to total charges |
| 34 | $88,512.95 | $0 | $0 | N - Not a self-pay claim | Claim should be removed from self-pay listing |
| 35 | $87,685.35 | $0 | $0 | N – Still an active account | Claim should be removed from self-pay listing |
| 36 | $85,781.75 | $85,401.75 | $0 | Y | An adjustment is needed to total charges |
| 37 | $85,306.66 | $85,306.66 | $0 | Y | N/A |
| 38 | $84,226.50 | $0 | $0 | N – Paid by patient | Claim should be removed from self-pay listing |

**For MA Days:**

For the total MA days for fiscal years ended June 30, 2015 and 2016, our results are as follows:

| For FYE 6/30/15 | Originally Submitted Number of Days | Substantiated Number Based on Source Documents | Explanation of Difference |
|---|---|---|---|
| FFS Days | 6,098 | 6,128 | Change in payer type |
| HMO Days | 20,480 | 20,689 | Change in payer type |
| OOS Days | 90 | 128 | Change in payer type |

| For FYE 6/30/16 | Originally Submitted Number of Days | Substantiated Number Based on Source Documents | Explanation of Difference |
|---|---|---|---|
| FFS Days | 4,440 | 4,462 | Change in payer type |
| HMO Days | 23,253 | 23,342 | Change in payer type |
| OOS Days | 216 | 216 | N/A |

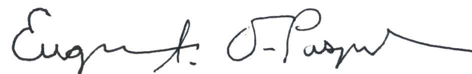
The DHS will use all substantiated reported claims and number of days to calculate Lancaster General Hospital's eligibility to receive, and if deemed eligible, its subsidy entitlement under both the extraordinary expense and uncompensated care methods. If eligible under both methods, the DHS will allow the facility to choose the method to be used to calculate the facility's 2019 Tobacco Settlement subsidy entitlement payment. The DHS establishes the date that these payments will be distributed to all eligible hospitals.

Our office is currently reviewing all facilities that are potentially eligible for a 2019 Tobacco Settlement subsidy entitlement payment. After all the reviews are completed, we will prepare for the DHS' use a report detailing the results of all of our reviews. The PHC4 and the DHS will contact you with instructions regarding entering adjustments to your facility's originally submitted claims and MA days data based on the results of our review.

As a reminder, each facility may submit for our review any claims coded as having Medicare, Medicaid, or any other insurance when submitted to the PHC4 for the fiscal year ended June 30, 2017, which the facility now believes qualify as self-pay claims, and which have total charges above the respective facility's costs threshold. We refer to these types of claims as "additional claims" and these additional claims must be submitted to the Department of the Auditor General no later than October 31, 2018. We are in receipt of Lancaster General Hospital's submitted additional claims for the fiscal year ended June 30, 2017. In order to qualify as extraordinary expense claims, these submitted additional claims must have total charges above Lancaster General Hospital's threshold of $68,003.56 and meet the applicable criteria. The results of our review of each facility's submitted additional claims data will be detailed in individualized reports sent to each respective hospital that submitted additional claims.

We thank the staff of Lancaster General Hospital for the cooperation extended to us during the course of our review. If you have any questions, please feel free to contact Tracie Fountain, CPA, Director, Bureau of Children and Youth Services Audits at 717-787-1159.

Sincerely,



Eugene A. DePasquale
Auditor General

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