

Medicare Home Office Cost Report Update

2023 Health Financial Systems User Conference August 11, 2023

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Learning Objectives



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What is a Home Office?

For Medicare and/or Medicaid purposes, CMS defines a home office as an entity that provides centralized management and administrative services to the individual members of a chain organization and a chain organization as an entity that consists of a group of two or more Medicare-certified providers (providers) or at least one provider and any other non-provider business or entity owned, leased, or through any other device, under common ownership or control.



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Home Office Basics

- Medicare Administrative Contractors (MACs) issue a home office number, not CMS
- Home office cost reports are due 150 days after year end, similar to other providers
- Providers claiming home office costs <u>must</u> provide the home office cost report as support for allowable costs at cost report filing
- The home office can include regional offices and divisions



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What's New?

- New form: CMS-287-22
- New regulation: CMS Pub. 15-2, Chapter 48
- Effective for cost report periods beginning on or after 10/1/2022
- New structure to better align with other form sets



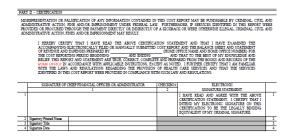
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What's New?

- New electronic filing requirement
 - o ECR and PI file required
 - Must file via MCReF or on a CD or flash drive
 - o Electronic signature is now an option





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New Structure

| Form CMS-297-05 | Form CMS-287-22 | Summary of Changes |
|-------------------------------------|------------------------------------|--|
| Schedule A, Part I & Part II | Schedule S, Parts I & II | Designated Part I as Cost Statement Status and added data elements identifying the status; added the electronic signature statement to the Part II Certification. |
| Schedule A, Part I | Schedule S-1, Parts I & II | Designated Part I as Home Office Data to capture identification information applicable to the home office/chain organization (HO/CO); designated key officer data as Part II. |
| Schedule A, Parts III, IV, & V | Schedule S-2, Parts I, II & III | Designated Parts I, II, and III as Healthcare Components, Non-Healthcare Components, and Region/Division Components, respectively, to list the components of the HO/CO. |
| Schedule B | Schedule A | Designated Schedule A as the updated Reclassification and Adjustment of Trial Balance of Expenses. |
| Schedule B-1 | Schedule A-6 | Designated Schedule A-6 as the updated Reclassifications of Expenses. |
| Schedule B-2, Parts I, II, & III | Schedule A-7, Parts I & II | Designated Part I as Analysis of Changes in Capital Asset Balances; designated Part II as Reconciliation of Capital Cost Centers. |



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New Structure (Cont.)

| Form CMS-297-05 | Form CMS-287-22 | Summary of Changes |
|-------------------------|-------------------------------------|---|
| Schedule C | Schedule A-8 | Designated Schedule A-8 as the updated Adjustments to Expenses. |
| Schedule D, Parts B & C | Schedule A-8-1, Parts I & II | Designated Part I as Adjustments Required as a Result of Transactions with Related Organizations and/or Home Office/Chain Organizations; Designated Part II as Interrelationship of Home Office/Chain Organization to Related Organizations. |
| Schedule E | Schedule B, Parts I, II, & III | Designated Parts I, II, & III as Healthcare Components, Non-Healthcare Components, and Region/Division Components, respectively, for direct allocations of capital related costs. |
| Schedule E-1 | Schedule B-1, Parts I, II, & III | Designated Parts I, II, & III as Healthcare Components, Non-Healthcare Components, and Region/Division Components, respectively, for direct allocations of non-capital related costs. |
| Schedule F, Part I | Schedule C, Parts I, II, & III | Designated Parts I, II, & III as Healthcare Components, Non-Healthcare Components, and Region/Division Components, respectively, for function allocations of capital related costs. |



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New Structure (Cont.)

| Form CMS-297-05 | Form CMS-287-22 | Summary of Changes |
|--------------------------|-------------------------------------|---|
| Schedule F, Part II | Schedule C-1, Parts I, II, & III | Designated Parts I, II, & III as Healthcare Components, Non-Healthcare Components, and Region/Division Components, respectively, for statistics to functionally allocate capital related costs. |
| Schedule F-1, Part I | Schedule D, Parts I, II, & III | Designated Parts I, II, & III as Healthcare Components, Non-Healthcare Components, and Region/Division Components, respectively, for function allocations of non-capital related costs. |
| Schedule F-1, Part II | Schedule D-1, Parts I, II, & III | Designated Parts I, II, & III as Healthcare Components, Non-Healthcare Components, and Region/Division Components, respectively, for statistics to functionally allocate non-capital related costs. |
| Schedule G, Part I | Schedule E | Designated Schedule E for the allocation of pooled costs for the double allocation method. |
| Schedule G, Part II | Schedule E-1, Parts I, II, & III | Designated Parts I, II, & III for the allocation of pooled costs to Healthcare Components, Non-Healthcare Components, and Region/Division Components, respectively. |

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New Structure (Cont.)

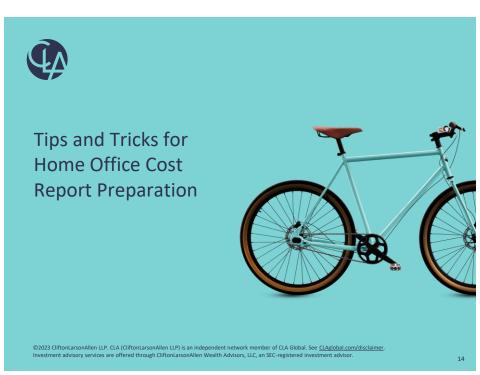
| Form CMS-297-05 | Schedule F, Parts I, II, & III Schedule F-1, Parts I, II, & III e J Schedule G | Summary of Changes |
|-----------------|--|---|
| | | Added the Schedule F, Parts I, II, and III, to summarize capital related costs by healthcare components, non-healthcare components, and region/division components, respectively. |
| | | Added the Schedule F-1, Parts I, II, and III, to summarize non-capital related costs by healthcare components, non-healthcare components, and region/division components, respectively. |
| Schedule J | Schedule G | Designated Schedule G as the updated Balance Sheet. |
| Schedule I | Schedule G-1 | Designated Schedule G-1 as the updated Statement of Revenues and Expenses. |



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Home Office Expenses

- Allowable expenses follow cost report rules
 - Expenses must be related to patient care
- Types of expenses recorded on the cost report depend on the structure of the home office/corporate entity
- Report expenses on Schedule A
 - Recommend using subscripted lines
 - Identify departmental expenses
 - More appropriately align with the cost allocation methodology



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Schedule A: Home Office Expenses

| 4895 (CONT.) | | FORM C | MS-287-22 | | | | | | (| 04-23 |
|---|-------------|------------|--------------|-------------|------|-------|------------|------------|-------------|-------|
| RECLASSIFICATION AND ADJUSTMENT OF TRIAL BALANCE OF | OF EXPENSES | | | | | HOME | | ERIOD: | SCHEDULE A | |
| | | | | | | NUMBI | R: 1 | ROM: | | |
| | | | | | | | | TO: | | |
| | | | | | | _ | | 10 | | |
| | | | | | | | | | | |
| | EXPENSES | | | | | | DIRECT | FUNCTIONAL | | |
| | PER | | RECLASSIFIED | | | ET | ALLOCATION | | | |
| | HOME OFFICE | RECLASS- | TRIAL | | | VABLE | TO | TO | POOLED | |
| | BOOKS | IFICATIONS | BALANCE | ADJUSTMENTS | EXPE | | COMPONENT | COMPONENTS | ALLOCATIONS | 1 |
| DESCRIPTION | 1 | 2 | 3 | 4 | | 5 | 6 | 7 | 8 | _ |
| CAPITAL RELATED COST CENTERS | | | | | _ | | | | | _ |
| 1 CRC-B&F | | | | | | | | | | 1 |
| 2 CRC-ME | | | | | | | | | | 2 |
| 3 Subtotal CRC | | | | | | | | | | 3 |
| OTHER CAPITAL RELATED COST CENTERS | | | | | | | | | | _ |
| 4 Insurance Premiums - Other CRC | | | | | | | | | | 4 |
| 5 Taxes & Licenses - Other CRC | | | | | | | | | | - 5 |
| 6 All Other Capital Related Costs | | | | | _ | | | | | 6 |
| 7 Subtotal Other CRC | | | | | | | | | | 7 |
| NON - CAPITAL COST CENTERS | | | | | | | | | | |
| 8 Salaries of Officers | | | | | | | | | | 8 |
| 9 Salaries & Wages of Others | | | | | | | | | | 9 |
| 10 Payroll Taxes | | | | | | | | | | 10 |
| 11 Employee Benefits - Payroll Related | | | | | | | | | | - 11 |
| 12 Employee Benefits - Non-Pay Related | | | | | | | | | | 12 |
| 13 Profit Sharing Pension Plans | | | | | | | | | | 13 |
| 14 Legal Fees | | | | | | | | | | 14 |
| 15 Auditing and Accounting Fees | | | | | | | | | | 15 |
| 16 Utilities | | | | | | | | | | 16 |
| 17 Communications | | | | | | | | | | 17 |
| 18 Travel & Entertainment | | | | | | | | | | 18 |
| 19 Transportation | | | | | | | | | | 19 |
| 20 Cleaning, Office & Admin Supplies | | | | | | | | | | 20 |
| 21 Minor Equipment | | | | | | | | | | 21 |
| 22 Repairs & Maintenance | | | | | | | | | | 22 |
| 23 Dues & Subscriptions | | | | | | | | | | 23 |
| 24 Contributions | | | | | | | | | | 24 |
| 25 Insurance Premiums - Non-Capital | | | | | | | | | | 25 |
| 26 Taxes & Licenses - Non-Capital | | | | | | | | | | 26 |
| 27 Interest Expense | | | | | | | | | | 27 |
| 28 Interest Income | | | | | | | | | | 28 |
| 29 | | | | | | | | | | 29 |
| 30 | | | | | | | | | | 30 |
| | | | | | | | | | | |
| | | | | | | | | | | |
| | | | | | | | | | | |
| | | | | | | | | | | 1 - |
| | | | | | | | | | | |
| 99 Subtotal Neu-capital Cost | | | | | | | | | | 99 |
| 100 Total | | | | | | | | | | 100 |
| | | | | | | | | | | |



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Home Office Expenses

Tip: Use home office grid to identify home office expenses and determine the best method of allocating allowable expenses

| Dept | Dept Name | Home Office Expenses | Statistic Used | Hospital #1 (Owned) | Hospital #2 (Owned) | Hospital #3 (Owned) | Hospital #4 (Managed) | Hospital #5 (Managed) | Foundation |
|------|-----------------|-------------------------|-------------------|------------------------|------------------------|------------------------|--------------------------|--------------------------|------------|
| 1 | Administration | 10,000,000 | | Х | Х | Χ | Χ | Х | Х |
| 2 | Payroll | 2,000,000 | | Х | Х | Χ | | | Х |
| 3 | Revenue Cycle | 5,000,000 | | Х | Х | Χ | | | |
| 4 | Finance | 3,000,000 | | Х | Х | Χ | Χ | Х | Х |
| 5 | IT | 6,000,000 | | Х | Х | Χ | | | Х |
| 6 | Human Resources | 2,000,000 | | Х | Х | Х | | | Х |
| 7 | Purchasing | 4,000,000 | | Х | Х | Х | | | |
| 8 | Advertising | 1,000,000 | | Х | Х | Х | | | |
| | | 33,000,000 | | | | | | | |



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Home Office Expenses

Tip: Use space grid to identify the location of department to ensure cost is on the home office cost report and allocated most appropriately

| | | | r | | Home Office Capital Line | & | Hospital #1 | Hospital #2 | Hospital #3 | Hospital #4 | Hospital #5 | |
|--------|-----------------|---|---------------|----|-----------------------------|---|-------------|-------------|-------------|-------------|-------------|------------|
| Dept ▼ | Dept Name | ~ | Location | ₩. | Statistic | * | (Owned ▼ | (Owned ▼ | (Owned) 🔻 | (Managed) ▼ | (Managed) | Foundation |
| 1 | Administration | | Hospital #1 | | | | Х | Х | х | Х | Х | Х |
| 2 | Payroll | | Corp Building | Α | | | Х | Х | х | | | Х |
| 3 | Revenue Cycle | | Corp Building | В | | | Х | Х | Х | | | |
| 4 | Finance | | Hospital #1 | | | | X | х | х | Х | X | X |
| 5 | IT | | Corp Building | Α | | | х | Х | х | | | х |
| 6 | Human Resources | | Corp Building | Α | | | Х | Х | Х | | | Х |
| 7 | Purchasing | | Corp Building | В | | | Х | Х | х | | | |
| 8 | Advertising | | Corp Building | В | | | х | х | х | | | |



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Schedule A: Home Office Expenses

| | DESCRIPTION | EXPENSES PER HOME OFFICE BOOKS |
|------|---------------------------------|--------------------------------|
| | | 1.00 |
| CAPI | TAL RELATED COST CENTERS | |
| 1.00 | CRC-B&F | 2,000,000 |
| 1.01 | CRC-B&F: BUILDING B | 500,000 |
| 1.02 | CRC-B&F: BUILDING C | 200,000 |
| 1.03 | CRC-B&F: HOSPITAL BUILDING | 50,000 |
| 2.00 | CRC-ME | 500,000 |
| 3.00 | SUBTOTAL CRC | 3,250,000 |
| отн | ER CAPITAL RELATED COST CENTERS | |
| 4.00 | INSURANCE PREMIUMS-OTHER CRC | 0 |
| 5.00 | TAXES & LICENSES-OTHER CRC | 0 |
| 6.00 | ALL OTHER CAPITAL RELATED COSTS | 0 |
| 7.00 | SUBTOTAL OTHER CRC | 0 |
| NON | -CAPITAL COST CENTERS | |
| 8.00 | SALARIES OF OFFICERS | 20,000,000 |
| 9.00 | SALARIES AND WAGES OF OTHERS | 0 |
| 9.01 | SALARIES - PAYROLL | 1,000,000 |
| 9.02 | SALARIES - REVENUE CYCLE | 5,000,000 |
| 9.03 | SALARIES - FINANCE | 3,000,000 |
| 9.04 | SALARIES - IT | 7,000,000 |
| 9.05 | SALARIES - HUMAN RESOURCES | 2,000,000 |
| 9.06 | SALARIES - PURCHASING | 500,000 |
| 9.07 | SALARIES - ADVERTISING | 200,000 |



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Cost Allocation Methodologies

| Methodology | Former Schedule | New Schedule |
|-------------|-----------------|--|
| Direct | E Series | B (Capital) & B-1 (Non-Capital) |
| Functional | F Series | C (Capital) & D (Non-Capital) |
| Pooled | G Series | E (Double Allocation) & E-1 (Component Allocation) |



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Cost Allocation Methodologies: Direct

- Allocate allowable home office cost directly attributable to a specific entity of the chain organization
 - Assign costs incurred for interest expense paid by the home office related solely to a specific entity(s)
 - Assign costs to the entity(s) where a specific employee(s) worked
 - Assign rental costs incurred by the home office which is directly attributable to an entity(s)



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Cost Allocation Methodologies: Direct

Here is an example of Schedule B-1 where an employee spends part of their time at Hospital 1 and Hospital 4

DIRECT ALLOCATION OF NON-CAPITAL RELATED COSTS

Schedule B-1

| PART | I - HEALTHCARE PROVIDER COMPONEN | TS | | | | | | | | | |
|-------|----------------------------------|--------|----------|----------|------------|------------|------------|------------|------------|------------|-------|
| | | | | SALARIES | | | | | | | |
| | COMPONENT NAME | | SALARIES | AND | | SALARIES - | | | SALARIES - | SALARIES - | |
| | COMPONENT NAME | | OF | WAGES OF | SALARIES - | REVENUE | SALARIES - | SALARIES - | HUMAN | PURCHASIN | |
| | | CCN | OFFICERS | OTHERS | PAYROLL | CYCLE | FINANCE | IT | RESOURCES | G | |
| | | 0 | 8.00 | 9.00 | 9.01 | 9.02 | 9.03 | 9.04 | 9.05 | 9.06 | |
| 1.00 | HOSPITAL 1 | 240001 | 100,000 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 1.00 |
| 2.00 | HOSPITAL 2 | 241235 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 2.00 |
| 3.00 | HOSPITAL 3 | 241236 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 3.00 |
| 4.00 | HOSPITAL 4 (NOT CONCURRENT) | 240002 | 200,000 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 4.00 |
| 5.00 | HOSPITAL 5 (NOT CONCURRENT) | 241237 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 5.00 |
| 51.00 | Total | | 300,000 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 51.00 |



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Cost Allocation Methodologies: Functional

- Allocate allowable cost using a statistical basis
- Functional statistic must stay the same between periods
- Request a change in statistic in writing within 120 days after the beginning of the cost reporting period for which this is being requested
 - Review statistics periodically for appropriateness



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Cost Allocation Methodologies: Functional

Use home office grid to help determine which departments/lines could use a functional allocation basis

FUNCTIONAL ALLOCATION OF CAPITAL RELATED COSTS - STATISTICS

Schedule C-1

| | COMPONENT NAME | CCN | CRC-B&F (SQUARE FEET) | CRC-B&F: BUILDING B (SQUARE FEET) | CRC-B&F: HOSPITAL BUILDING (SQUARE FEET) | CRC-B&F: HOSPITAL BUILDING | CRC-ME (DOLLAR VALUE) | |
|-------|-----------------------------|--------|-----------------------------|--|--|----------------------------------|-----------------------------|-------|
| | | 0 | 1.00 | 1.01 | 1.02 | 1.03 | 2.00 | |
| 1.00 | HOSPITAL 1 | 240001 | 1,000,000 | 1,000,000 | 1,000,000 | 0 | 0 | 1.00 |
| 2.00 | HOSPITAL 2 | 241235 | 500,000 | 500,000 | 500,000 | 0 | 0 | 2.00 |
| 3.00 | HOSPITAL 3 | 241236 | 200,000 | 200,000 | 200,000 | 0 | 0 | 3.00 |
| 4.00 | HOSPITAL 4 (NOT CONCURRENT) | 240002 | 0 | 0 | 500,000 | 0 | 0 | 4.00 |
| 5.00 | HOSPITAL 5 (NOT CONCURRENT) | 241237 | 0 | 0 | 200,000 | 0 | 0 | 5.00 |
| 51.00 | Total | | 1,700,000 | 1,700,000 | 2,400,000 | 0 | 0 | 51.00 |



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Cost Allocation Methodologies: Functional

 Test various bases to determine the most appropriate one for reporting

FUNCTIONAL ALLOCATION OF NON-CAPITAL RELATED COSTS - STATISTICS

Schedule D-1

Example #1

| | COMPONENT NAME | CCN | SALARIES OF OFFICERS (HOURS) | SALARIES AND WAGES OF OTHERS (HOURS) | SALARIES - PAYROLL (HOURS) | SALARIES - REVENUE CYCLE (HOURS) | SALARIES - FINANCE (HOURS) | SALARIES - IT (HOURS) | SALARIES - HUMAN RESOURCES (HOURS) | SALARIES - PURCHASIN G (HOURS) | |
|-------|-----------------------------|--------|---------------------------------------|--|----------------------------------|---|----------------------------------|-----------------------------|---|---|-------|
| | | 0 | 8.00 | 9.00 | 9.01 | 9.02 | 9.03 | 9.04 | 9.05 | 9.06 | |
| 1.00 | HOSPITAL I | 240001 | 1,000,000 | 1,000,000 | 1,000,000 | 1,000,000 | 1,000,000 | 1,000,000 | 1,000,000 | 1,000,000 | 1.00 |
| 2.00 | HOSPITAL 2 | 241235 | 500,000 | 500,000 | 500,000 | 500,000 | 500,000 | 500,000 | 500,000 | 500,000 | 2.00 |
| 3.00 | HOSPITAL 3 | 241236 | 200,000 | 200,000 | 200,000 | 200,000 | 200,000 | 200,000 | 200,000 | 200,000 | 3.00 |
| 4.00 | HOSPITAL 4 (NOT CONCURRENT) | 240002 | 600,000 | 600,000 | 0 | 0 | 600,000 | 0 | 0 | 0 | 4.00 |
| 5.00 | HOSPITAL 5 (NOT CONCURRENT) | 241237 | 300,000 | 300,000 | 0 | 0 | 300,000 | 0 | 0 | 0 | 5.00 |
| 51.00 | Total | | 2,600,000 | 2,600,000 | 1,700,000 | 1,700,000 | 2,600,000 | 1,700,000 | 1,700,000 | 1,700,000 | 51.00 |

FUNCTIONAL ALLOCATION OF NON-CAPITAL RELATED COSTS - STATISTICS

Schedule D-1

Example #2

| PART | PART I - HEALTHCARE PROVIDER COMPONENTS | | | | | | | | | | | |
|-------|---|--------|-------------|-----------------|------------|-------------|-------------|------------|------------|-------------------------|-------|--|
| | | | SALARIES | SALARIES AND | | | | | | SALARIES - PURCHASIN | | |
| | COMPONENT NAME | | OF | WAGES OF | | SALARIES - | SALARIES - | SALARIES - | SALARIES - | G | | |
| | | | OFFICERS | OTHERS | SALARIES - | REVENUE | FINANCE | IT | HUMAN | (COSTED | | |
| | | | (TOTAL | (TOTAL | PAYROLL | CYCLE | (TOTAL | (# OF | RESOURCES | REQUISITIO | | |
| | | CCN | COST) | COST) | (SALARIES) | (CHARGES) | COST) | USERS) | (SALARIES) | NS) | | |
| | | 0 | 8.00 | 9.00 | 9.01 | 9.02 | 9.03 | 9.04 | 9.05 | 9.06 | | |
| 1.00 | HOSPITAL I | 240001 | 30,000,000 | 30,000,000 | 10,000,000 | 100,000,000 | 30,000,000 | 1,000 | 10,000,000 | 1,000,000 | 1.00 | |
| 2.00 | HOSPITAL 2 | 241235 | 20,000,000 | 20,000,000 | 5,000,000 | 50,000,000 | 20,000,000 | 500 | 5,000,000 | 500,000 | 2.00 | |
| 3.00 | HOSPITAL 3 | 241236 | 10,000,000 | 10,000,000 | 3,000,000 | 30,000,000 | 10,000,000 | 300 | 3,000,000 | 200,000 | 3.00 | |
| 4.00 | HOSPITAL 4 (NOT CONCURRENT) | 240002 | 30,000,000 | 30,000,000 | 0 | 0 | 30,000,000 | 0 | 0 | 0 | 4.00 | |
| 5.00 | HOSPITAL 5 (NOT CONCURRENT) | 241237 | 10,000,000 | 10,000,000 | 0 | 0 | 10,000,000 | 0 | 0 | 0 | 5.00 | |
| 51.00 | Total | | 100.000.000 | 100,000,000 | 18,000,000 | 180,000,000 | 100.000.000 | 1.800 | 18,000,000 | 1,700,000 | 51.00 | |

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Cost Allocation Methodologies: Functional

Examine the cost impact to each entity

FUNCTIONAL ALLOCATION OF NON-CAPITAL RELATED COSTS

Schedule ${\bf D}$

Example #1

| | Example 112 | | | | | | | | | | | |
|-------|---|--------|------------|----------|------------|------------|------------|------------|------------|------------|-------|--|
| PART | PART I - HEALTHCARE PROVIDER COMPONENTS | | | | | | | | | | | |
| | | | | SALARIES | | | | | | | | |
| | COMPONENT NAME | | SALARIES | AND | | SALARIES - | | | SALARIES - | SALARIES - | | |
| | | | OF | WAGES OF | SALARIES - | REVENUE | SALARIES - | SALARIES - | HUMAN | PURCHASIN | | |
| | | CCN | OFFICERS | OTHERS | PAYROLL | CYCLE | FINANCE | IT | RESOURCES | G | | |
| | | 0 | 8.00 | 9.00 | 9.01 | 9.02 | 9.03 | 9.04 | 9.05 | 9.06 | | |
| 1.00 | HOSPITAL 1 | 240001 | 7,568,189 | 0 | 587,198 | 2,941,177 | 1,152,516 | 4,110,393 | 1,174,398 | 294,117 | 1.00 | |
| 2.00 | HOSPITAL 2 | 241235 | 3,784,096 | 0 | 293,600 | 1,470,588 | 576,258 | 2,055,197 | 587,199 | 147,059 | 2.00 | |
| 3.00 | HOSPITAL 3 | 241236 | 1,513,638 | 0 | 117,440 | 588,235 | 230,503 | 822,079 | 234,880 | 58,824 | 3.00 | |
| 4.00 | HOSPITAL 4 (NOT CONCURRENT) | 240002 | 4,540,915 | 0 | 0 | 0 | 691,510 | 0 | 0 | 0 | 4.00 | |
| 5.00 | HOSPITAL 5 (NOT CONCURRENT) | 241237 | 2,270,457 | 0 | 0 | 0 | 345,755 | 0 | 0 | 0 | 5.00 | |
| 51.00 | Total | | 19,677,295 | 0 | 998,238 | 5,000,000 | 2,996,542 | 6,987,669 | 1,996,477 | 500,000 | 51.00 | |

Example #2

FUNCTIONAL ALLOCATION OF NON-CAPITAL RELATED COSTS

Schedule D

| PART | PART I - HEALTHCARE PROVIDER COMPONENTS | | | | | | | | | | | |
|-------|---|--------|------------|----------|------------|------------|------------|------------|------------|------------|-------|--|
| | | | | SALARIES | | | | | | | | |
| | COMPONENT NAME | | SALARIES | AND | | SALARIES - | | | SALARIES - | SALARIES - | | |
| | | | OF | WAGES OF | SALARIES - | REVENUE | SALARIES - | SALARIES - | HUMAN | PURCHASIN | | |
| | | CCN | OFFICERS | OTHERS | PAYROLL | CYCLE | FINANCE | IT | RESOURCES | G | | |
| | | 0 | 8.00 | 9.00 | 9.01 | 9.02 | 9.03 | 9.04 | 9.05 | 9.06 | | |
| 1.00 | HOSPITAL 1 | 240001 | 5,880,590 | 0 | 549,451 | 2,777,760 | 895,504 | 3,884,573 | 1,098,902 | 294,117 | 1.00 | |
| 2.00 | HOSPITAL 2 | 241235 | 3,920,400 | 0 | 274,725 | 1,388,900 | 597,020 | 1,942,286 | 549,450 | 147,059 | 2.00 | |
| 3.00 | HOSPITAL 3 | 241236 | 1,960,200 | 0 | 164,835 | 833,340 | 298,510 | 1,165,372 | 329,670 | 58,824 | 3.00 | |
| 4.00 | HOSPITAL 4 (NOT CONCURRENT) | 240002 | 5,880,600 | 0 | 0 | 0 | 895,530 | 0 | 0 | 0 | 4.00 | |
| 5.00 | HOSPITAL 5 (NOT CONCURRENT) | 241237 | 1,960,200 | 0 | 0 | 0 | 298,510 | 0 | 0 | 0 | 5.00 | |
| 51.00 | Total | | 19,601,990 | 0 | 989,011 | 5,000,000 | 2,985,074 | 6,992,231 | 1,978,022 | 500,000 | 51.00 | |



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Cost Allocation Methodologies: Pooled

- All allowable costs not allocated via direct or functional allocations are distributed to the entities by the pooled allocation basis
- Allowable statistics for pooled allocation:
 - Inpatient Days: Use if the home office consists of comparable inpatient healthcare providers
 - Total Costs (excluding home office cost): Use if providers are not comparable inpatient healthcare providers
 - Other sophisticated basis if approved by the MAC
 - Request in writing within 120 days after the beginning of the cost reporting period for which this is being requested



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Cost Allocation Methodologies: Pooled

 Double allocation between healthcare provider components, non-healthcare components and region/division components – recommend using cost less home office allocations as the basis

ALLOCATION OF POOLED COSTS FOR DOUBLE ALLOCATION METHOD

| | | | | CAPITAL RELATED | | | | | | | |
|------|--------------------------------|-------------|-----------|-----------------|------------|----------|----------|--------|--|--|--|
| | | ALLOCATIO | | | | | | | | | |
| | | N | | | | | | | | | |
| | DESCRIPTION | STATISTICS | | | | CRC-B&F: | CRC-B&F: | | | | |
| | | (TOTAL | ALLOCATIO | | CRC-B&F: | HOSPITAL | HOSPITAL | | | | |
| | | COSTS) | N RATIO | CRC-B&F | BUILDING B | BUILDING | BUILDING | CRC-ME | | | |
| | | 1.00 | 2.00 | 3.00 | 3.01 | 3.02 | 3.03 | 4.00 | | | |
| 1.00 | Healthcare Provider Components | 100,000,000 | 0.995025 | 0 | 0 | 0 | 0 | 0 | | | |
| 2.00 | Non-Healthcare Components | 500,000 | 0.004975 | 0 | 0 | 0 | 0 | 0 | | | |
| 3.00 | Region / Division Components | 0 | 0.000000 | 0 | 0 | 0 | 0 | 0 | | | |
| 4.00 | Total | 100,500,000 | 1.000000 | 0 | 0 | 0 | 0 | 0 | | | |



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Cost Allocation Methodologies: Pooled

 Enter statistics for each part to allocate the attributed expense from Schedule E

ALLOCATION OF POOLED COSTS TO COMPONENTS

| PART | PART I - HEALTHCARE PROVIDER COMPONENTS | | | | | | | | | | | |
|-------|---|--------|-------------|-----------|-----------------|------------|----------|----------|--------|--|--|--|
| | | | | | CAPITAL RELATED | | | | | | | |
| | | | | | | | | | | | | |
| | | | | | | | | | | | | |
| | | | ALLOCATIO | | | | | | | | | |
| | | | N | | | | | | | | | |
| | COMPONENT NAME | | STATISTICS | | | | CRC-B&F: | CRC-B&F: | | | | |
| | | | (TOTAL | ALLOCATIO | | CRC-B&F: | HOSPITAL | HOSPITAL | | | | |
| | | CCN | COST) | N RATIO | CRC-B&F | BUILDING B | BUILDING | BUILDING | CRC-ME | | | |
| | | 0 | 1.00 | 2.00 | 3.00 | 3.01 | 3.02 | 3.03 | 4.00 | | | |
| 1.00 | HOSPITAL 1 | 240001 | 30,000,000 | 0.300000 | 0 | 0 | 0 | 0 | 0 | | | |
| 2.00 | HOSPITAL 2 | 241235 | 20,000,000 | 0.200000 | 0 | 0 | 0 | 0 | 0 | | | |
| 3.00 | HOSPITAL 3 | 241236 | 10,000,000 | 0.100000 | 0 | 0 | 0 | 0 | 0 | | | |
| 4.00 | HOSPITAL 4 (NOT CONCURRENT) | 240002 | 30,000,000 | 0.300000 | 0 | 0 | 0 | 0 | 0 | | | |
| 5.00 | HOSPITAL 5 (NOT CONCURRENT) | 241237 | 10,000,000 | 0.100000 | 0 | 0 | 0 | 0 | 0 | | | |
| 6.00 | | | 0 | 0.000000 | 0 | 0 | 0 | 0 | 0 | | | |
| 51.00 | Total | | 100,000,000 | 1.000000 | 0 | 0 | 0 | 0 | 0 | | | |



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Cost Allocations Overview

- Consider the most appropriate cost allocation bases for home office costs direct, functional, pooled as it can impact reimbursement
 - Cost-based reimbursement
 - Cost-to-charge ratios used in rate setting (like outliers)
 - Wage index use allocation methods determined in the cost report OR pooled cost to identify wages and benefits attributable to individual entities
 - Medicaid DSH cost calculation
 - Other



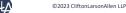
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Common Pitfalls

- Not all management fees are allowable
- Owner compensation is allowable only to the extent that it is related to patient care and is reasonable
- Varying rules around organization, startup, and corporate acquisition costs
- Allowability of interest income/expense depends on source and use
 - Interest income offsetable against interest expense is adjusted on Schedule A, line 28 and flows to Schedule F-







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Common Pitfalls

- Nonconcurrent cost reporting periods
- Be familiar with any applicable state Medicaid regulations for chain components
 - Some states place a cap on home office costs allowable in the Medicaid cost report
- Space cost for home office personnel
 - o Is the space on a facility cost report?
- Are there shared services which should be reported on the home office cost report but on the individual entity's books?



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