

# Facility Fee Trends Calendar Year “CY” 2017-2021

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# Facility Fee Filing Mandate

- ❖ Effective July 1, 2016, C.G.S. §19a-508c(m)(1) requires hospitals/hospital health systems to report certain information on facility fees charged or billed for outpatient services provided at **hospital-based off-campus** locations to OHS, annually.
- ❖ C.G.S. §19a-508c(l) also prohibits hospitals, hospital health systems and hospital-based facilities from charging facility fees for outpatient evaluation and management (E/M) services:
  - ❖ provided at a hospital-based off-campus location;
    - ❖ except for insurance contracts pre-dating 7/2/2016 that provide reimbursements for facility fees for E/M services, facility fees are banned on contract expiration; or
    - ❖ except for such services provided at a satellite emergency department
  - ❖ exceeding the Medicare rate for uninsured patients

# Facility Fee Filing Mandate Intent

- ❖ To analyze and monitor trends on hospital/hospital health system facility fees for Medicare, Medicaid, private insurers and other payers
- ❖ To restrict facility fee charging for outpatient routine office visits
- ❖ To provide transparency

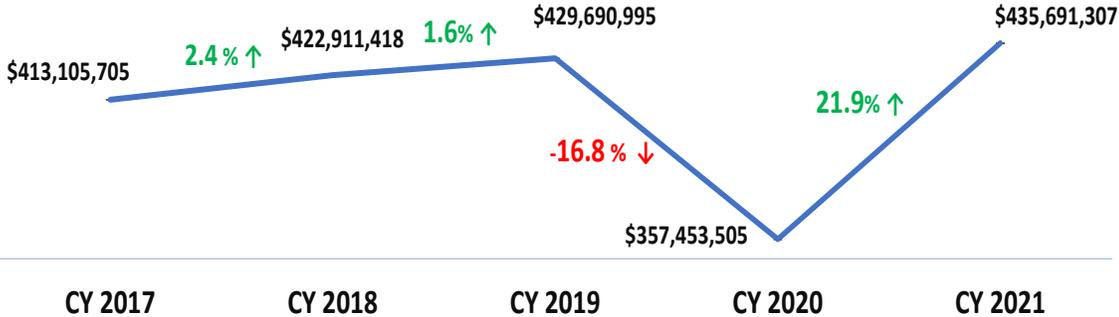
# Facility Fee Transparency

In its entirety, the mandate also requires hospital-based off-campus outpatient facilities to:

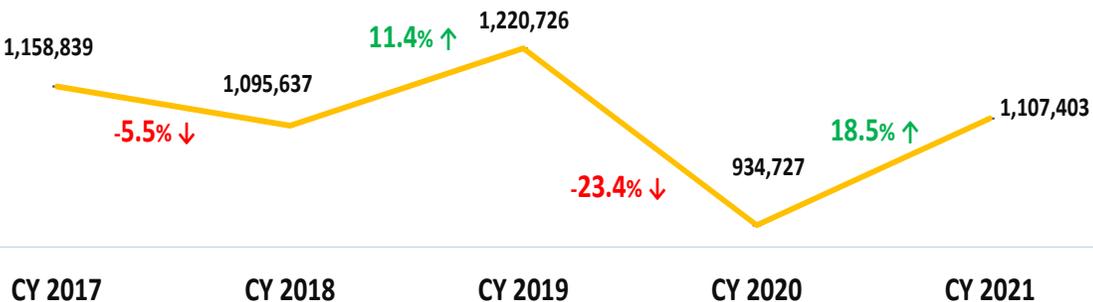
- ❖ Give existing patients written notice that they may be charged a facility fee
- ❖ Identify the fee as a facility fee in addition to, or separately from, any professional fee
- ❖ Provide a general notice to patients through:
  - ❖ Prominently displayed written notices that the facility may charge a facility fee; and
  - ❖ Clearly displayed signage, marketing, website, etc., that the facility is hospital-based

# Statewide Facility Fee Revenue and Visits Increased in 2021

Facility Fees Total Net Revenue (\$): CY 2017 - CY 2021



Facility Fees Patient Visits: CY 2017 - CY 2021



Source: OHS Facility Fee Filing Table 2

# Majority of individual hospital facility fee revenue and visits increased in 2021

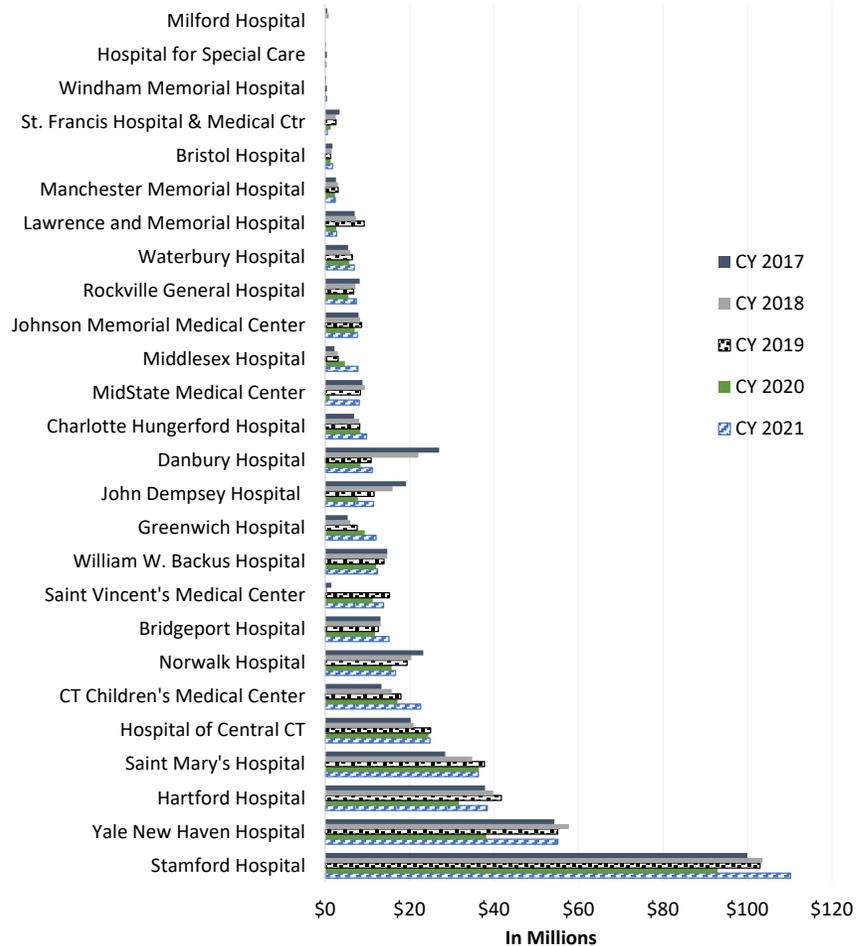
Calendar Year "CY" 2017 - 2021 Statewide Hospital-based Off Campus Outpatient Centers Facility Fees

Facility Fees Received (Net Revenue)							Facility Fee Visits						
Hospital	Change Between CY21 & CY20	CY 2021	CY 2020	CY 2019	CY 2018	CY 2017	Hospital	Change Between CY21 & CY20	CY 2021	CY 2020	CY 2019	CY 2018	CY 2017
Stamford Hospital	↑	\$110,212,046	\$92,967,542	\$102,961,603	\$103,554,118	\$99,953,102	Stamford Hospital	↑	137,310	108,738	128,222	134,159	133,105
Yale New Haven Hospital	↑	\$55,087,814	\$38,183,600	\$55,068,310	\$57,707,915	\$54,286,176	Yale New Haven Hospital	↑	279,164	206,033	387,507	341,381	383,103
Hartford Hospital	↑	\$38,386,669	\$31,707,104	\$41,708,246	\$39,782,690	\$37,866,692	Hartford Hospital	↑	61,519	48,162	57,421	30,441	46,299
Saint Mary's Hospital	↓	\$36,293,271	\$36,361,847	\$37,716,367	\$34,828,846	\$28,425,333	Saint Mary's Hospital	↓	28,837	48,190	59,602	55,338	11,323
Hospital of Central CT	↑	\$24,854,179	\$24,483,789	\$24,985,458	\$20,927,746	\$20,219,138	Hospital of Central CT	↑	83,294	63,827	69,312	61,843	86,994
CT Children's Medical Center	↑	\$22,624,091	\$17,119,746	\$17,919,155	\$15,778,707	\$13,341,238	CT Children's Medical Center	↑	41,808	35,413	28,952	16,199	15,507
Norwalk Hospital	↑	\$16,655,023	\$15,745,558	\$19,403,614	\$20,399,722	\$23,239,520	Norwalk Hospital	↑	41,019	36,645	49,236	48,706	55,898
Bridgeport Hospital	↑	\$15,124,487	\$11,811,914	\$12,594,411	\$13,160,890	\$13,110,022	Bridgeport Hospital	↑	36,780	28,088	18,650	17,654	4,710
Saint Vincent's Medical Center	↑	\$13,856,637	\$11,275,337	\$15,217,616	\$526,434	\$1,451,117	Saint Vincent's Medical Center	↑	32,738	24,401	32,935	3,508	15,777
William W. Backus Hospital	↑	\$12,411,773	\$12,097,854	\$13,921,521	\$14,730,605	\$14,728,865	William W. Backus Hospital	↑	71,623	67,333	80,031	59,677	54,408
Greenwich Hospital	↑	\$12,066,880	\$9,389,941	\$7,565,369	\$5,947,836	\$5,339,725	Greenwich Hospital	↑	14,648	11,375	12,579	7,553	8,504
John Dempsey Hospital	↑	\$11,438,314	\$7,704,233	\$11,574,607	\$15,972,913	\$19,150,995	John Dempsey Hospital	↓	51,194	56,345	71,044	75,938	115,510
Danbury Hospital	↑	\$11,178,936	\$8,374,848	\$10,885,928	\$22,070,002	\$26,991,035	Danbury Hospital	↑	27,434	20,909	27,812	30,358	39,599
Charlotte Hungerford Hospital	↑	\$9,785,007	\$8,317,601	\$8,204,623	\$8,053,854	\$6,853,820	Charlotte Hungerford Hospital	↑	35,064	31,516	25,445	28,427	30,260
MidState Medical Center	↑	\$8,112,102	\$1,095,019	\$8,389,603	\$9,389,059	\$8,831,374	MidState Medical Center	↑	30,073	11,293	30,695	30,965	31,458
Middlesex Hospital	↑	\$7,768,823	\$4,677,880	\$3,067,342	\$2,991,893	\$2,186,130	Middlesex Hospital	↑	20,384	15,029	9,178	8,370	4,172
Johnson Memorial Medical Center	↑	\$7,620,802	\$6,976,788	\$8,653,906	\$8,270,527	\$7,889,312	Johnson Memorial Medical Center	↓	12,707	13,386	13,549	12,620	5,991
Rockville General Hospital	↑	\$7,401,390	\$5,533,194	\$6,769,489	\$7,180,171	\$8,173,757	Rockville General Hospital	↑	29,096	23,504	30,606	31,822	17,446
Waterbury Hospital	↑	\$6,875,508	\$5,731,246	\$6,437,300	\$5,993,401	\$5,407,017	Waterbury Hospital	↑	8,554	7,469	7,848	16,618	6,865
Lawrence and Memorial Hospital	↑	\$2,711,247	\$2,617,521	\$9,221,894	\$7,309,844	\$6,991,766	Lawrence and Memorial Hospital	↑	16,644	15,332	24,519	17,788	15,738
Manchester Memorial Hospital	↑	\$2,411,421	\$2,366,584	\$3,085,711	\$3,036,646	\$2,556,697	Manchester Memorial Hospital	↓	20,983	21,678	22,684	22,413	33,899
Bristol Hospital	↑	\$1,763,850	\$1,304,868	\$1,295,119	\$1,569,651	\$1,765,651	Bristol Hospital	↓	19,624	29,525	21,140	23,486	27,247
St. Francis Hospital & Medical Ctr	↓	\$519,502	\$1,322,899	\$2,589,838	\$2,506,939	\$3,402,122	St. Francis Hospital & Medical Ctr	↓	2,590	7,807	7,697	7,413	3,049
Windham Memorial Hospital	↑	\$329,559	\$205,855	\$246,855	\$219,760	\$234,205	Windham Memorial Hospital	↑	2,246	1,722	1,478	1,130	1,120
Hospital for Special Care	↑	\$201,974	\$80,739	\$207,110	\$133,191	\$187,230	Hospital for Special Care	↑	2,070	1,007	2,584	2,504	1,516
Milford Hospital		N/A	N/A	N/A	\$868,060	\$523,666	Milford Hospital		N/A	N/A	N/A	9,326	9,341
<b>Grand Total</b>	↑	<b>\$435,691,307</b>	<b>\$357,453,505</b>	<b>\$429,690,995</b>	<b>\$422,911,418</b>	<b>\$413,105,705</b>	<b>Grand Total</b>	↑	<b>1,107,403</b>	<b>934,727</b>	<b>1,220,726</b>	<b>1,095,637</b>	<b>1,158,839</b>

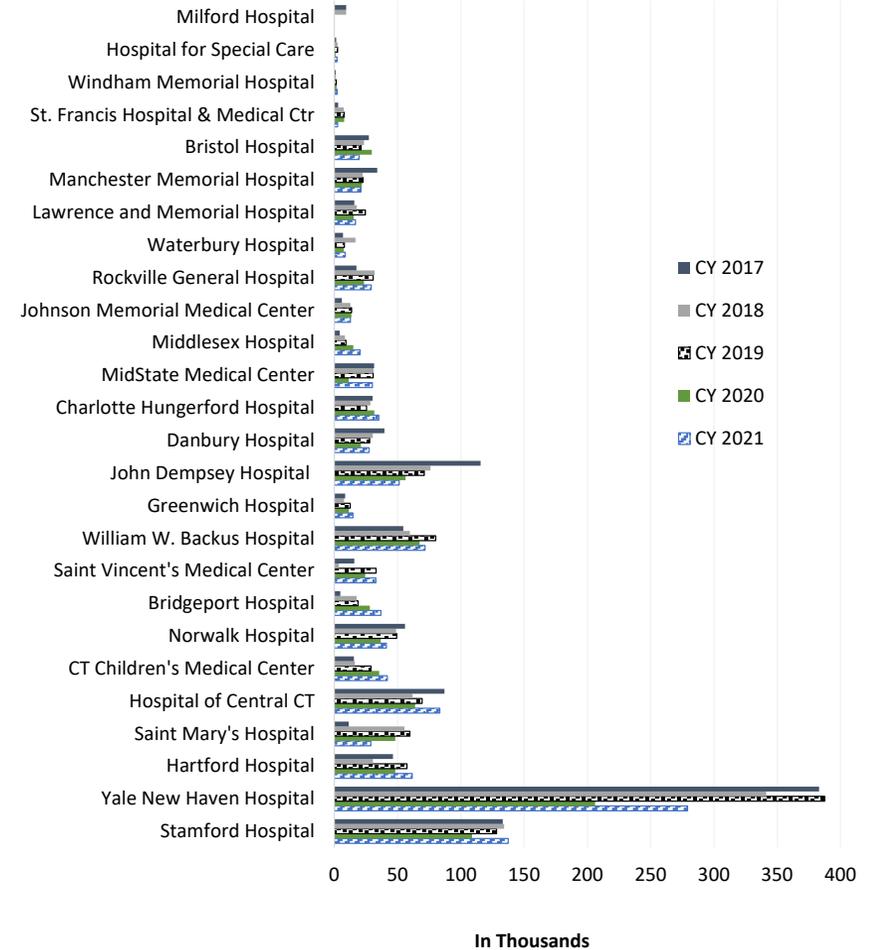
Source: OHS Facility Fee Filing Table 2

# Facility fee Stamford had highest revenue and Yale the most visits

Facility Fees Total Net Revenue By Hospital: CY 2017-2021

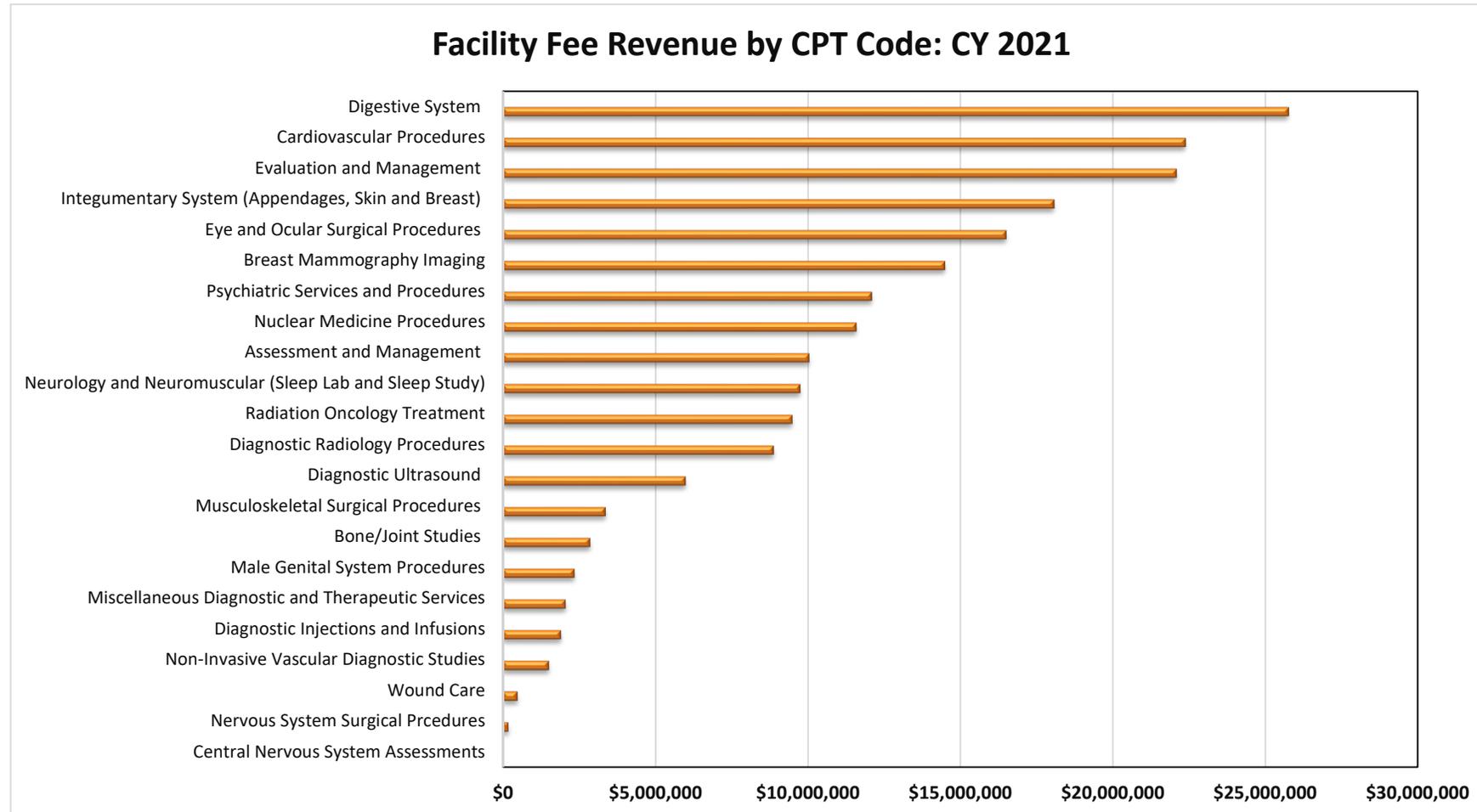


Facility Fees Patient Visit By Hospital: CY 2017-2021



Source: OHS Facility Fee Filing Table 2

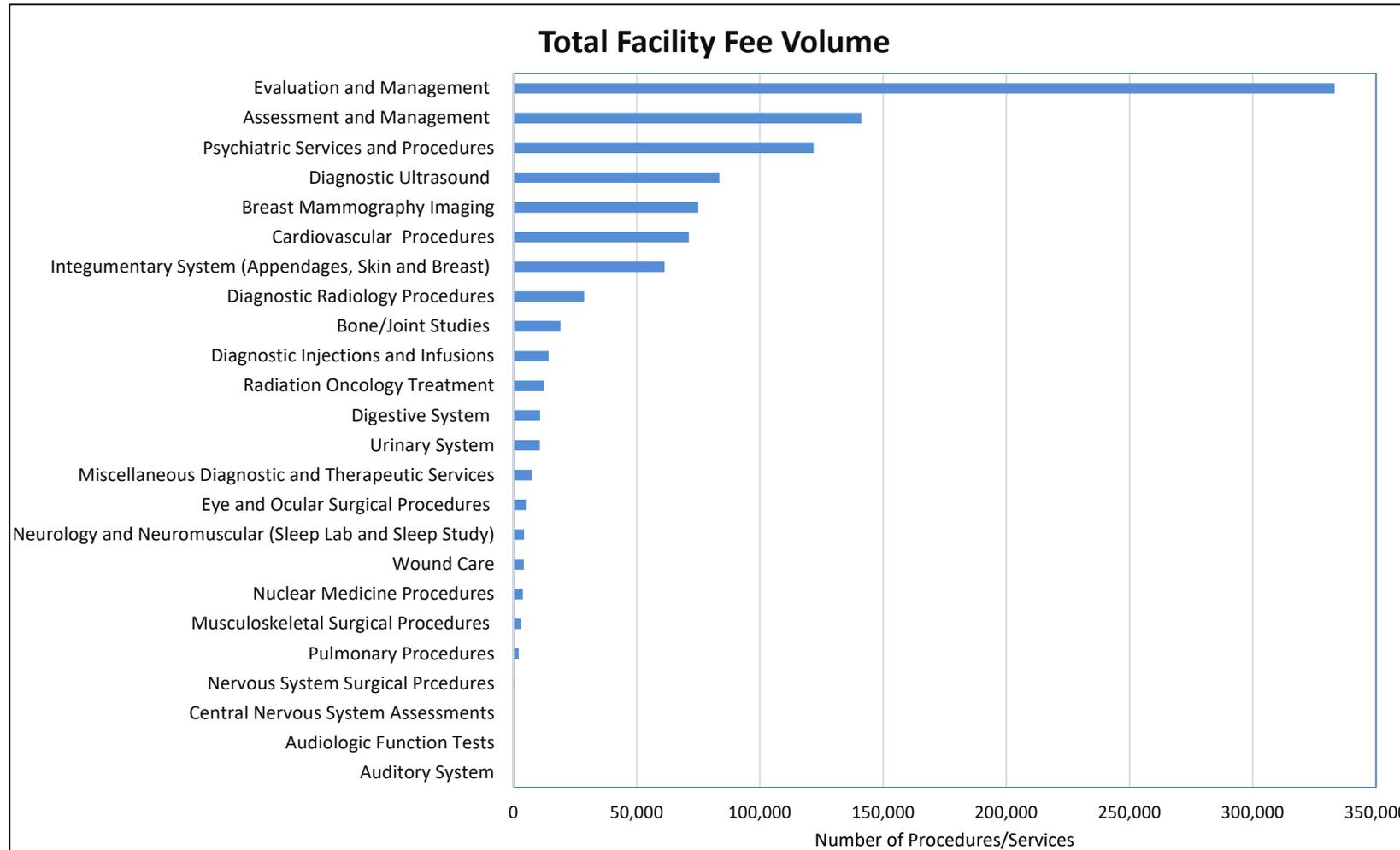
# Digestive System and Cardiovascular Procedures generated the most facility fee revenue



Source: OHS Facility Fee Filing Table 1

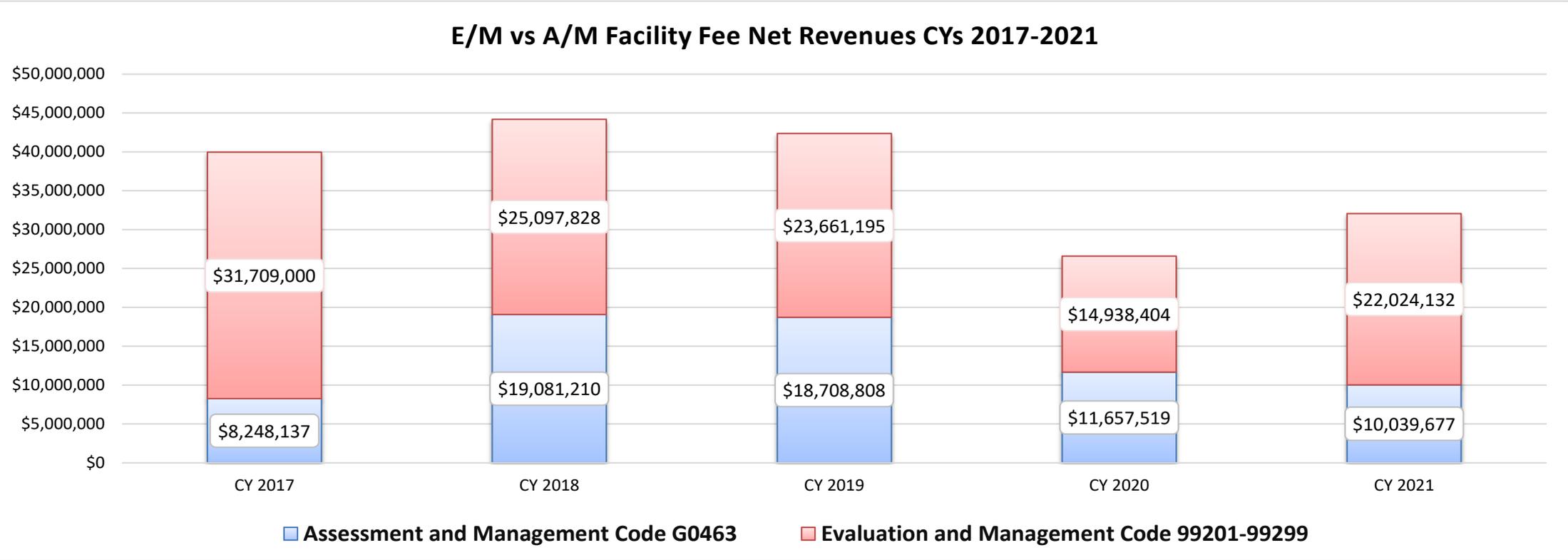
\*Services were determined by CPT/HCPCS categories..

# Facility E/M & A/M visits top facility fee volume in 2021



Source: OHS Facility Fee Filing Table 1

# Facility Fee E/M revenue increased and A/M decreased in 2021



In 2014, CMS collapsed E/M codes for clinic visits into HCPCS code G0463 Assessment and Mgmt (A/M).

In 2021, CMS provides for four separate levels of E/M visits.

A/M and E/M they are interchangeable but use different CPT codes.

Assessment and Management is hospital outpatient clinic visit for assessment of a patient.

Evaluation and Management are visits and services that manage patient health.

Source: OHS Facility Fee Filing Table 1

# Top three individual locations that generated the most facility fee revenue

## 2021

- 1) Stamford Hospital (Tully Health Center)- **\$93 million**
- 2) St Mary's Hospital (Oncology Center)- **\$17.5 million**
- 3) Connecticut Children's Medical Center (Ambulatory Surgery Center)- **\$15.5 million**

## 2020

- 1) Stamford Hospital (Tully Health Center)- **\$78.9 million**
- 2) St Mary's Hospital (Oncology Center)- **\$15.8 million**
- 3) Norwalk Hospital (Radiology & Mammography Center)- **\$14.4 million**

# Top three facility fee revenue generating services by provider

## 2021

- 1) Yale New Haven Hospital (Evaluation and Management)- **\$12.4 million**
- 2) Hartford Hospital (Eye and Ocular Surgical Procedures)- **\$10.9 million**
- 3) Stamford Hospital (Breast Mammography Imaging)- **\$4.7 million**

## 2020

- 1) Hartford Hospital (Eye and Ocular Surgical Procedures)- **\$9.9 million**
- 2) Yale-New Haven Hospital (Evaluation & Management Services)- **\$8.7 million**
- 3) Stamford Hospital (Colonoscopy with biopsy)- **\$4.2 million**

# Top three facility fee services by visit volume and provider

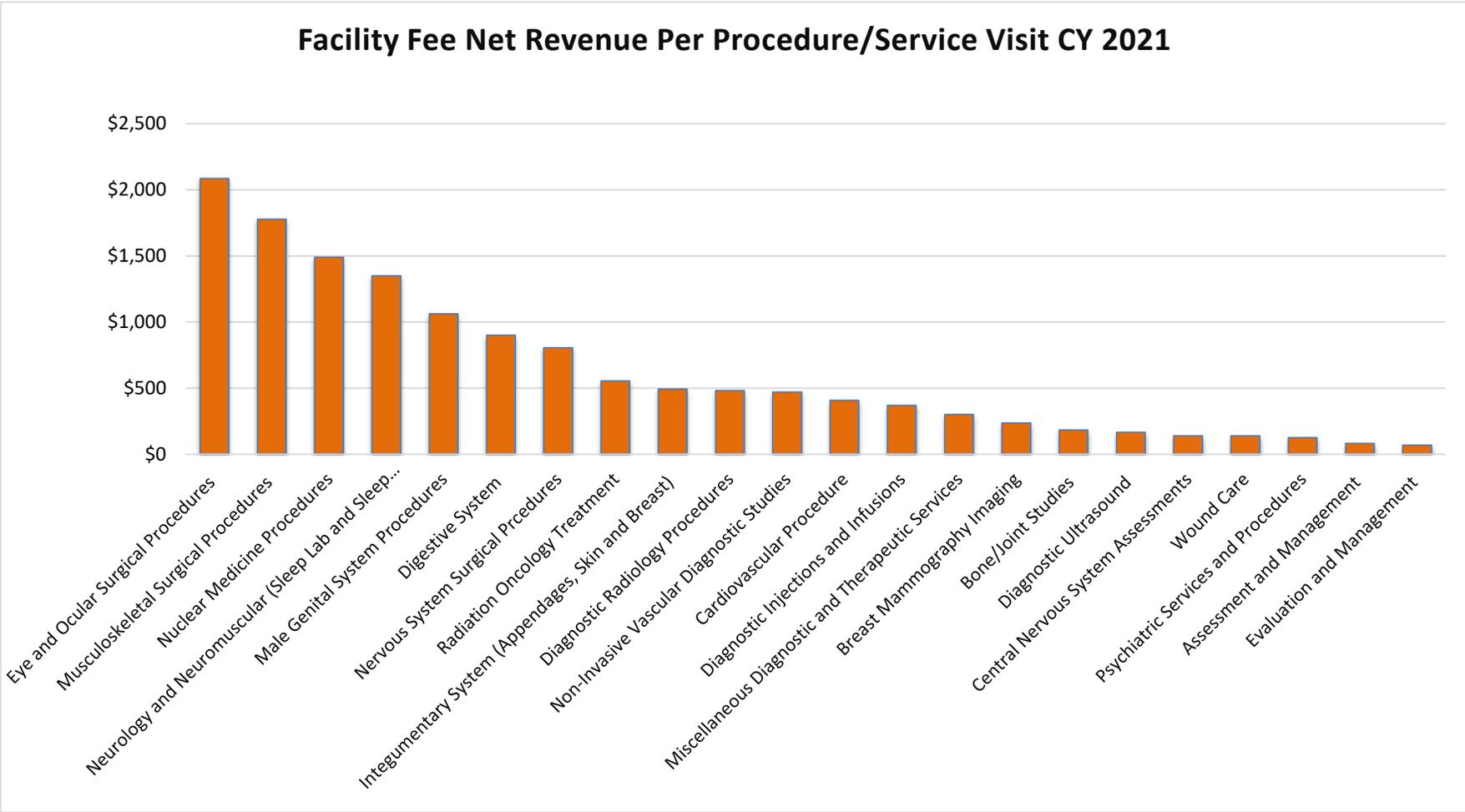
## 2021

- 1) Yale New Haven Hospital (Evaluation & Management Services)- 235,566
- 2) Saint Vincent's Medical Center (Psychiatric Services and Procedures)- 26,547
- 3) Backus Hospital (Assessment & Management OP Clinic Visit)- 25,763

## 2020

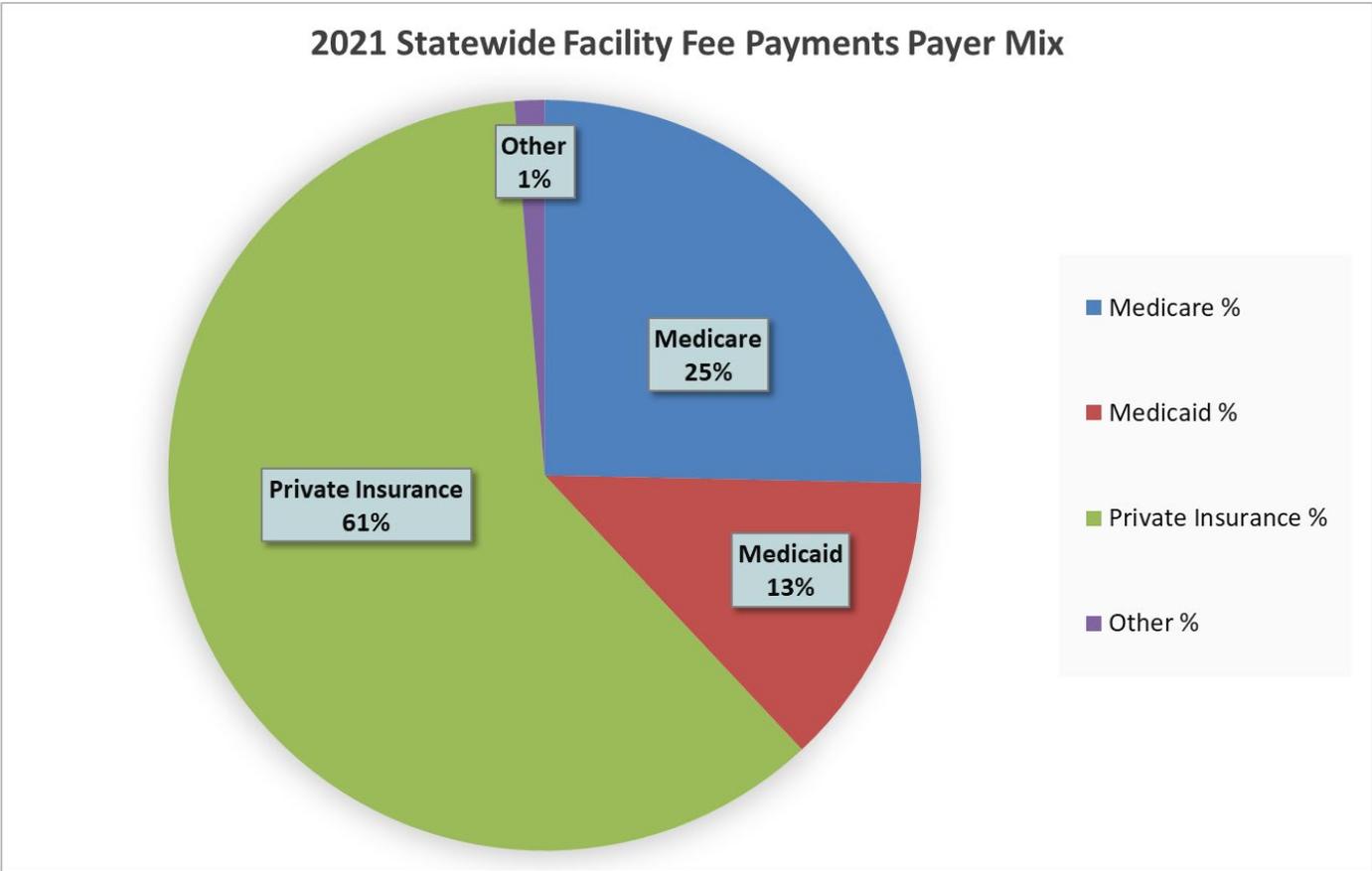
- 1) Yale New Haven Hospital (Evaluation & Management Services)- 216,493
- 2) The William W. Backus Hospital (Assessment & Management OP Clinic Visit)- 28,222
- 3) John Dempsey Hospital (Assessment & Management OP Clinic Visit)- 25,086

# Eye/Ocular, Musculoskeletal Surgical and Nuclear Medicine procedures had the highest per visit facility fee revenue



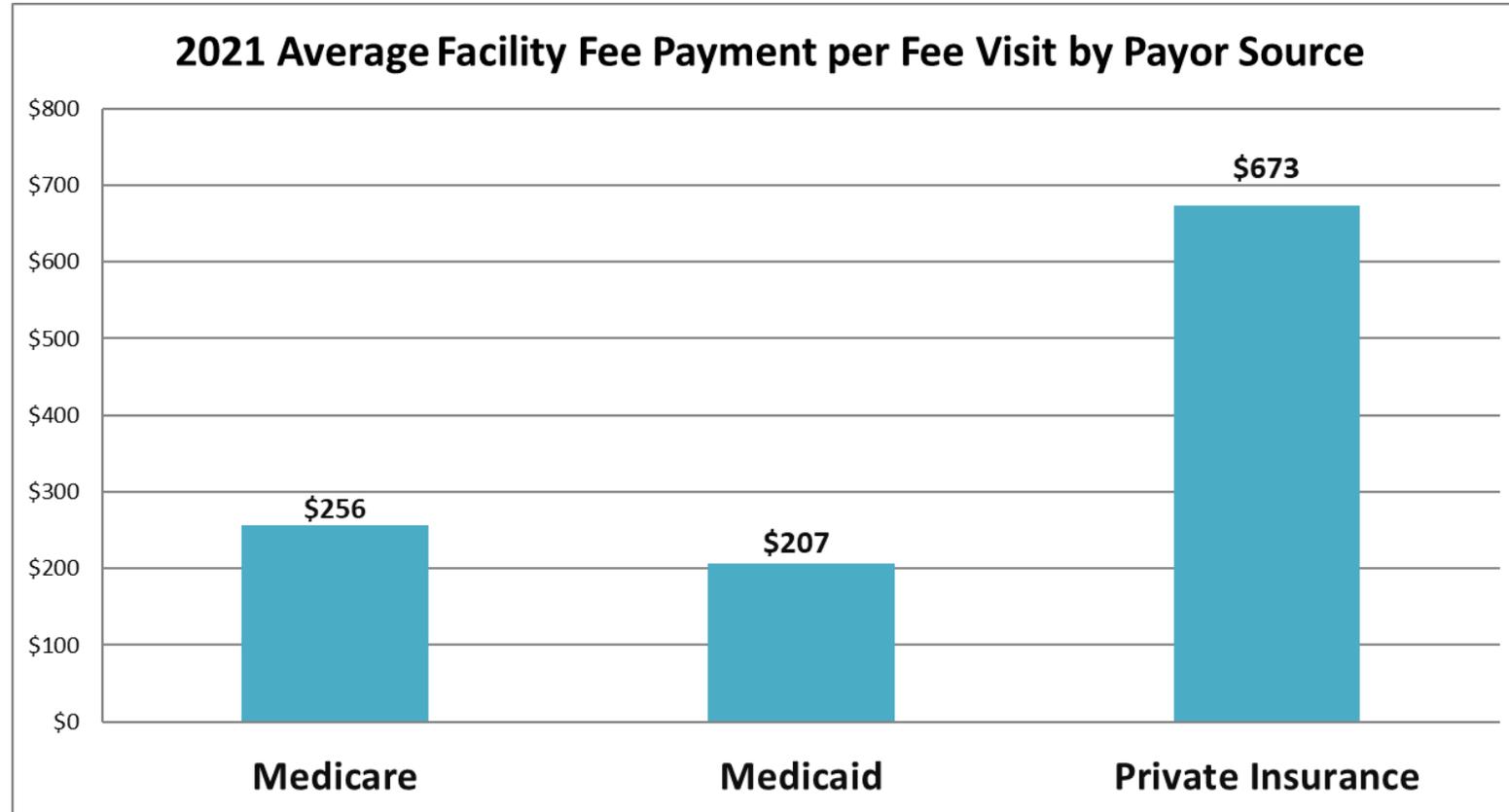
Source: OHS Facility Fee Filing Table 1

# Majority of facility fee revenue was from the privately insured



Source: OHS Facility Fee Filing Table 2

# Privately insured paid the highest average facility fee payment per visit



# Limitations of the current law

- ❖ The exact facility fee(s) charged for specific services at each location **cannot** be determined through these filings.
- ❖ The reported data provides information on the top ten revenue generating procedures/services at hospital-based off-campus outpatient centers, only.
- ❖ There is no way to determine if the facility fees charged uninsured patients exceed the Medicare rate.

# Facility Fee Filing Changes – Public Act 21-129

- ❖ Requires a sample of a billing statement with information required by the law to be provided to OHS.
- ❖ Provide a copy of the written notice, with tag lines, that are in locations that are readily accessible to and visible by patients.
  - ❖ Taglines are C.G.S. §19a-508c a short statement written in a non-English language that indicates the availability of language assistance services free of charge; and
  - ❖ Requires facility fee charge notification in at least 15 languages, posted in appointment check-in areas, and sent to OHS.
- ❖ Each hospital-based facility that was part of a transaction shall report to OHS the number of patients served by the facility in the preceding three years.

# Facility Fee Changes continued...

- ❖ No facility fee charges for A/M codes (or E&M codes) at hospital off campus locations.
- ❖ Report total *charges* and revenue received by payer mix for the top ten services or procedures by CPT Code and by patient volume.
- ❖ When a health care facility becomes hospital based and may charge a facility fee patients of the facility for the preceding three years to be notified.

# Facility Fee Changes Telehealth-Public Act 22-81

- ❖ No facility fee charges for telehealth.
  - ❖ no telehealth provider or hospital shall charge a facility fee for telehealth services
  - ❖ ruling applies to services whether provided on campus or otherwise; and
  - ❖ effective date May 10, 2021, and ending on June 30, 2024

# Questions

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**For more information on facility fees visit**

**<https://portal.ct.gov/OHS/Health-Systems-Planning/Notifications/Facility-Fees>**

**To know more about OHS visit**

**<https://portal.ct.gov/OHS>**