

### Health Care Facilities

# Proposed FY24 IPPS rate of +2.8%, better than FY23

**Government Regulations** 

### +2.8% net rate proposed, better than FY23

The Centers for Medicare & Medicaid Services (CMS) issued the proposed FY24 payment rule for the Inpatient Hospital Prospective Payment System (IPPS), effective October 1, 2023. This proposed rule will increase IPPS operating payments by +2.8% in FY24, above +2.6% finalized for FY23 and the +2.6% finalized for FY22. Overall, the proposed rate update is better than last year, largely as expected, and likely to be modestly higher in the final rule.

### DSH cut -2%, publics see -0.1% EBITDA headwind

This proposed reg includes a reduction in disproportionate share (DSH) payments of -2.4%, worse than the -0.3% for FY23 but better than the -8% for FY22. The uncompensated care pool, meanwhile, is shrinking by -2% y/y. With the smaller industry pool, our analysis indicates that on average, the publicly traded hospitals would see a -2% decrease in DSH payments and a -0.1% headwind to EBITDA on average (slightly better than -0.2% in FY23). This is a slight negative for the acute players, although this impact is included in the +2.8% net rate update. UHS and CYH seem best positioned (roughly 0% impact), followed by HCA (-0.2%), and THC (-0.2%). Overall, the DSH cut is in line with the decreases we have seen in recent years.

### Market basket (MB) of 3.0%, below FY23

The proposed rule provides a MB update of +3.0% (below the +4.1% in FY23 but above the +2.7% in FY22), which is reduced by a -0.2% productivity adjustment. This implies a net update of +2.8%.

### For-profits get +2.8%, in line with industry

We note that the rate update for for-profits is the better proxy for the rate update that public hospital companies will see. For-profit facilities will see a net update of +2.8%, in line with the average for all facilities, but below the +3.3% in FY23. Meanwhile, non-profits will also see a +2.8% rate, better than the +2.5% in FY23.

### **Urban rates 50bps below rural hospitals rates**

In this proposed rule, CMS estimates urban hospitals will see a rate update of +2.8%, in line with the industry overall. Rural hospitals will see a rate update of +3.3%.

### 11 April 2023

Equity United States HC Facilities

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### **Key Terms**

CMS = Centers for Medicare and Medicaid

DSH Payments = Disproportionate Share Hospital Payments

IPPS = Inpatient Hospital Prospective Payment System

CYH = Community Health Systems

HCA = HCA Healthcare

THC = Tenet Healthcare Corp

UHS = Universal Health Services

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**Exhibit 1: Estimated FY24 Medicare DSH Proposed Rule Impact**On average, public hospital companies will see a -2.1% decrease in DSH payments

| 2023                                    | Industry | CYH   | HCA    | THC   | UHS   | Average |
|---|----------|-------|--------|-------|-------|---------|
| % of DSH/Uncompensated pool             |          | 1.1%  | 7.6%   | 1.4%  | 0.9%  |         |
| New DSH                                 | \$3,487  | \$37  | \$265  | \$49  | \$31  |         |
| Uncompensated care pool                 | \$6,874  | \$72  | \$521  | \$97  | \$61  |         |
| Total                                   | \$10,362 | \$109 | \$786  | \$146 | \$91  |         |
|   |          |       |        |       |       |         |
| 2024                                    | Industry | CYH   | HCA    | THC   | UHS   | Average |
| % of DSH/Uncompensated pool             |          | 1.1%  | 7.6%   | 1.4%  | 0.9%  |         |
| New DSH                                 | \$3,405  | \$37  | \$258  | \$47  | \$31  |         |
| Uncompensated care pool                 | \$6,713  | \$72  | \$508  | \$92  | \$61  |         |
| Total                                   | \$10,118 | \$109 | \$766  | \$139 | \$91  |         |
|   |          |       |        |       |       |         |
| Y/Y Change                              | (\$244)  | (\$0) | (\$20) | (\$8) | (\$0) |         |
| Y/Y Change %                            | -2.4%    | -0.5% | -2.6%  | -5.3% | -0.2% | -2.1%   |
| Proposed FY24 Change, % of 2024E EBITDA |          | 0.0%  | -0.2%  | -0.2% | 0.0%  | -0.1%   |
| Proposed FY24 Change, % of 2024E EPS    |          | -0.2% | -0.3%  | -0.7% | 0.0%  | -0.3%   |
|   |          |       |        |       |       |         |
| FY23 DSH changes, % of 2023E EBITDA     |          | -0.1% | -0.2%  | -0.3% | -0.1% | -0.2%   |
| FY23 DSH changes, % of 2023E EPS        |          | -1.3% | -0.4%  | -1.0% | -0.1% | -0.7%   |

**Source:** CMS, BofA Global Research estimates

Note: FCF/share used for CYH

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