

Uniform Data System (UDS) Financial Tables Guidance

Table	Brief Description	Checks
Costs: 1	able 8A	
5 & 8A	FTEs and cost in sync	 Ideally, there should be a worksheet reconciling the FTE distributions on Table 5 with the personnel cost distributions on Table 8A. Cost with no FTEs may be explained by paid referred care contracts for lab, x-ray, and other services. Significant differences in the CY-PY are compared. Check for differences and correct or provide clear explanations. Unreasonably low or high costs per FTE may be an indication of a possible mismatch of cost and FTEs. This may also be explained by donated staff where there are FTEs on the service line but the cost is reported on the donated line.
5 & 8A	Other Programs and Services FTEs and cost	 "Specify" text box in this category across both Tables 5 & 8A should contain the same description (e.g., if WIC is described on Table 5 Line 29 FTE, the costs should also note they relate to WIC). The Other Programs and Services category includes items and programs not classifiable elsewhere and those not exclusively tied to health center patients. This line includes: WIC, pass-through cost, space leased to others, staff contracted to others, retail pharmacy, adult day health care, research, etc. Receipts related to these costs are reported on Table 9E on the appropriate line. For example, pass-through receipts are reported on Table 9E, Line 6, and are offset by an equal amount of cost on Table 8A Line 12 Other Program-Related Services.
8A & 9E	Donation descriptions	 Donated drugs (Table 8A) are to be valued at 340B prices, reported on Line 18 and described in the specify box. Drugs donated by the pharmaceutical company directly to the patient are not reported. Other donations (non-cash donations on Table 8A and cash donations on Table 9E) should be described in the specify boxes. In-kind donation revenue is reported on Table 8A, not on Table 9E. Report cash donations on Table 9E, Other Revenue, not as a donation on Table 8A.
8A, 9D, 9E	Pharmacy size	 Reporting no pharmacy or pharmaceutical cost is unusual and should be explained. Medications administered by clinicians in-house are to be reported on the pharmaceutical line and not in medical. Report dispensing cost from community-based 340B pharmacies on the Table 8A pharmacy Line 8a. Contract pharmacies take their fees from sales receipts before reimbursing the health center, which causes some to omit dispensing cost and some to understate drug replenishment cost. Review pharmacy cost if it is greater than drug cost. Nationally pharmaceutical costs are 59% of the total pharmacy costs. Pharmacy revenue data (see Table 9D) are to be reported in the same manner as all other service revenue. Work with contract pharmacies to ensure the health center receives detailed reports that show the pharmacy, drug, and dispensing fees costs separately, and that charges are reported as of the date of service and collections are reported by payer. This is important in centers where the pharmacy cost is significant. Refer to the UDS Manual Appendix B, which provides further detail on reporting 340B contract pharmacy.



Table	Brief Description	Checks
8A	Allocation methods	 There are multiple ways which overhead may be allocated. Preparers should use the simplest method which produces a reasonably accurate and comparable result to a more complex method. Cost centers with no overhead allocation will be questioned. Allocating known direct costs first is preferable. For example, all the facility cost of a dental-only site would be charged directly to dental. Doing an allocation of facility cost second and administration cost third is also preferable. A lesser overhead charge should be considered for large purchased service items. If the proportion of overhead cost to direct cost is the same for each line, it indicates that a one-step method was used. Given that managing personnel consumes most of the overhead, using square feet of space as the sole allocation basis will generally not produce an accurate allocation of overhead. Using total direct cost, FTEs or personnel cost is a preferable one step basis.
8A	Overhead outliers	 Overhead cost to total cost rates of 7% for facility and 25% for non-clinical support (administration) are stable national averages over time. There is little deviation from the mean. Outliers will be questioned to check for misclassifications of cost. Significant change in rates from the prior year should be explained. Large pharmacy programs will drive overhead rates down.
All	Subrecipients and contractors	 Health centers should identify the existence of subrecipient and large contractor arrangements and explain how those arrangements are reported on the UDS. Subrecipients are to report a complete set of UDS tables which are consolidated with the health center's data. Contractors report the services delivered and the cost reported is the amount paid by the health center.
Patient	Service Revenue: Table	9D
4 & 9D	Adjustments (retros, receipts, paybacks, etc.)	 Report retros in columns (c1, c2, and c3) and add to column (b) as collections and subtract retros out of column (d) as adjustments— do the opposite for (c4) paybacks made with check. No Medicaid adjustments may mean the health center is improperly recognizing charges at the FQHC rate rather than the normal fee value. This is more likely in states where Medicaid or its MCOs pay the centers their FQHC rate rather than a market rate. The absence of wraps or settlements for managed care plans should be explained. Sliding fee adjustments are reviewed for reasonableness. Usually the change from the PY is consistent with change in self-pay charges. Indigent care fund revenue data will increase sliding fee adjustments. Bad debt reported on the UDS is currently limited to self-pay. The self-pay bad debt reported is either the amount directly written off from patient accounts or preferably the amount of change in the allowance account attributable to self-pay.
4 & 9D	Insurance vs. Payer	 Table 4 classifies patients by medical insurance and Table 9D classifies revenue data by the payer from which the revenue is expected or received. Other Public should be consistent with Table 4 except that other public categorical grants such as Title X and BCCCP are not insurance and the patients are usually classified as uninsured on Table 4.



Table	Brief Description	Checks
4 & 9D	Managed care enrollment data consistency	 MCOs who don't provide enrollment data are not considered managed care for UDS reporting on both Tables 4 and 9D. Outlier PMPM capitation and charges PMPY amounts will be questioned as will any significant change from the PY. Unusually low capitation amounts (for example between \$5-\$10 per member per month) may be due to case management being mistakenly reported as managed care; and high amounts could be due to missing enrollment data or unusually high-risk coverage (e.g., HIV or prenatal). Amounts might be lower or higher but should be explained The absence of wraps or retroactive settlements should be explained. There will be no wraps if MCOs are paying PPS rather than market rates. Wraps and settlements are to be allocated on the three lines within each payer and in Columns c1 and c2.
5 & 9D	Charge ratios	 Charges per patient, charges per visit, and charge to cost ratio outliers may be questioned. Large pharmacy operations may explain high ratios and low productivity may explain a low charge to cost ratio.
9D	Pharmacy revenue	 Contract and in-house pharmacy revenue is reported on Table 9D. Pharmacy data are to be reported on Table 9D in the same manner as other services are reported. Pharmaceutical charges are to be recorded in a uniform amount - generally the retail or UCR price - for each drug for each payer by date of service; collections are to be reported by payer upon receipt along with any corresponding adjustments. See Appendix B of the UDS Manual. Pharmacy revenue data can be a problem because of limitations of the data provided by the 340B pharmacies. Work with contract pharmacies to ensure you get the pharmacy, drug, and dispensing fees costs separately; and that charges, collections, and adjustments are reported by payer. This may be questioned, particularly in centers where the pharmacy cost is significant, as is the case when the costs exceed \$1M or more or the cost is proportionately much greater than the national average of 14% of total cost.
9D	Insufficient pharmacy data	When pharmacy data are reported by contractors on a cash basis and when receipts by payer are unknown, report the receipts on Table 9D, Line 13, Column B, and offset those receipts with an equal amount of charges in Column A. This should be corrected for future reporting.
9D	Medicare G Codes or other capitated or negotiated rates	 Charges are to be reported at the normal fee value across all payers. Charges are not to be reported at negotiated or discounted rates. Medicare requires the G-codes and CPT codes to be included on Medicare claims. The G-codes should be eliminated from the charges reported on the UDS. Most practice management systems have corrected for this, and if not a manual adjustment is needed.
9D	Performance incentives	 Many managed care plans and many other insurers pay a performance bonus or incentive of some sort. This is to be reported in Column b and Column c3; and not on Table 9E.



Table	Brief Description	Checks
9D	Charge reclassification	 Charges less collections less adjustments = change in accounts receivable (A/R). Nationally A/R increased in an amount equal to 0.3 months of charges. The change in A/R is usually consistent with the change in charges - when charges increase A/R increases. Large changes in A/R are questioned. Check that a large increase is not the result of adjustment entries being reversed. Large A/R decreases may be an error if retroactive payments are included as collections in Column b, but were not taken out of Column d, as adjustments. Charges are to be reclassified to secondary and subsequent payers when appropriate. Failure to do this will usually cause the change in Medicare and Private payer A/R to increase and self-pay to decrease.
9D	Patient and charge mix by payer	 The patient payer mix and charge payer mix are usually comparable with some difference expected. Nationally the charge mix for Medicaid plus Medicare (64%) is three points higher than the patient mix for Medicaid plus Medicare (61%). A large obstetrics practice or a large pharmacy operation can cause the charge mix to be greater than the patient mix. The failure to exclude Medicare G-codes from charges will overstate the Medicare payer mix. Reporting charges at negotiated or discounted rates will undermine the validity and usefulness of the charge mix data.
Other I	Revenue: Table 9E	
8A & 9E	Revenue	 Table 9E only includes cash receipts related to revenue. Loan proceeds are not reported because they are not revenue. Insurance proceeds are not reported if the loss was taken as an asset reduction. In-kind donations received are not cash receipts and are not reported on Table 9E but in-kind donations consumed are reported on the donations Line 18 of Table 8A.
9D & 9E	Patient service receipts	 Incentive and performance payments are to be reported on Table 9D except for CMS EHR incentive receipts, which are reported on Line 3a of Table 9E. Retail pharmacy receipts are reported as other revenue on Table 9E, Line 10. Categorical grant receipts which are tied to patient services are reported on Table 9D. Categorical grants which are not tied directly to specific patient services and which reimburse for expenses are reported on Table 9E.
9D & 9E	Indigent care	 Indigent care should be reported consistently in states and localities. Indigent program receipts are reported on Table 9E. The charges and any patient receipts and sliding fee discounts applied to the charges are to be reported in self-pay on Table 9D, Line 13.
9E	COVID-19 receipts	 COVID-19 supplemental funds through the BPHC are to be checked against the H8 and C8 grant sources. The amount reported on Table 9E, Lines 1I-1p2, should not exceed the total award amount, and must reflect only the amount drawn down during the calendar year. Receipts directly from the Provider Relief Fund through HHS are reported on Table 9E, Line 3b. Report other COVID-19 receipts on the Table 9E line for the entity for which the health center received funds from, regardless of original source. Loans are not reported as revenue anywhere in the UDS.



Table	Brief Description	Checks
9E	Receipts by source	 Receipts are reported by the source from whom they were received and not where they originated RW A = local government or non-profit; RW B = state and RW C = federal). The specify boxes should identify dollars by source when amounts are material and when more than one source is included.
9E	Surplus or loss	 Surplus or Loss = Tables 9D+9E receipts less Table 8A cost before donations. Large surplus or loss for CY & PY are questioned. Check if the amount is consistent with audited net revenue. Check if some receipts or costs are excluded, particularly pharmacy revenue or cost. A possible reason for changes from year to year may be timing of grant or wrap receipts showing large deficit one year and surplus the next.
9E	Large change from prior year	Review prior year reporting for comparability to check that items are not omitted. If omitted, confirm no dollars were received in the current year for that program.
9E	Other receipts	 Other Revenue, Line 10, are to be described. Nationally, other receipts = 4% of total 9D+9E receipts. Do not report any patient service revenue on the Other Revenue line.

Note: Follow the UDS Manual instructions when reporting on the financial tables, though they may differ from accounting principles. Reporting questions not clearly addressed by the UDS Manual are to be discussed with the UDS support line or the reviewer who will counsel with the health center's UDS team to determine the best approach.

Last updated: August 30, 2023

HRSA Health Center Program

UNIFORM DATA SYSTEM

Acronyms Used:

- A/R Accounts receivable
- BCCCP Breast and Cervical Cancer Control Program
- CMS Centers for Medicare & Medicaid Services
- COVID-19 Coronavirus disease
- CY Current or calendar year
- EHR Electronic health record
- FQHC Federally qualified health center
- FTE Full-time equivalent
- HHS U.S. Department of Health and Human Services
- HIV Human immunodeficiency virus
- MCO Managed care organization
- PMPM Per member per month
- PMPY Per member per year
- PPP Paycheck Protection Program
- PPS Prospective payment system
- PY Prior year
- RW Ryan White
- UCR Usual, customary, and reasonable
- WIC Women, infants, and children