Appendix A: Methodology details

Our calculation of hospital tax exemption value draws from the methods in the following studies:

- Plummer, E., Socal, M., Bai, G. (2024). Estimation of Tax Benefit of US Nonprofit Hospitals. *JAMA*.
- Godwin, J., Levinson, Z., Hulver, S. (2023). The Estimated Value of Tax Exemption for Nonprofit Hospitals Was About \$28 Billion in 2020. *KFF Health News*.
- Zare, H., Eisenberg, M., Anderson, G. (2022). Comparing the value of community benefit and Tax-Exemption in non-profit hospitals. *Health Services Research.*
- Ernst & Young LLP. (2022). Estimates of the federal revenue forgone due to the taxexemption of non-profit hospitals compared to the community benefit they provide, 2019. Prepared for the American Hospital Association.
- Herring, B., Gaskin, D. Zare, H., Anderson, G. (2018). Comparing the Value of Nonprofit Hospitals' Tax Exemption to Their Community Benefits. *Inquiry*
- Rosenbaum, S., Kindig, D., Bao, J., Byrns, M., O'Laughlin, C. (2015). The Value Of The Nonprofit Hospital Tax Exemption Was \$24.6 Billion In 2011. *Health Affairs*.

Methods comparison

We considered the following previous estimates of hospital tax exemption value in building our methodology:

- Kaiser Family Foundation, 2023
- <u>American Hospitals Association, 2022</u> (federal tax benefits only)
- Johns Hopkins Research Team, 2018, 2021
- Health Affairs, 2015
- Plummer et al, 2024

Key findings comparison

Previously published research finds that the estimated value of hospitals' tax exemption ranges from \$12.4 billion to \$37 billion in total, and \$5 million to \$12.8 million on average, depending on the study.

The gap between hospitals' tax exemption value and community benefit spending ranges from \$985 billion more in community benefit to \$20.6 billion more in tax breaks. This measure largely depends on what is counted as "community benefit." No study finds that hospital spending on

financial assistance or community health improvement alone exceeded their tax exemption value.

| Method | Health Affairs | Johns Hopkins 2018 | Johns Hopkins 2021 | АНА | KFF | Plummer et al | Lown |
|------------------------------------|--|---|---|---|---|--|--|
| Year reported | 2011 | 2012 | 2011 - 2018 | 2019 | 2011-2020 | 2021 | 2020-2022 |
| Number of hospitals included | About 2,980 | 1,648 | 1,472 | About 2,500 | 2,753 in 2020 (est. from RAND data set) | 2,927 | 1,879 |
| Tax exemption value | National total: \$24.6 Billion Average for hospital: \$8.3 M The value of tax exemption grew from \$12.6B in 2002 to \$24.6 B in 2011, a 57% increase accounting for inflation. | National total: \$18.6 Billion Average for hospital: \$11.3 M. | National total: \$18.0 billion Average for hospital: \$12.24 M | National total \$12.4 billion Average for hospital: About \$5 million | National total: \$28 Billion in 2020. Average for hospital: \$10.2 million The value of tax exemption grew from \$19 B in 2011 to \$28 B in 2020, a 45% increase. | National total: \$37.4B Average per hospital: \$12.8 million | Total for 20 states: \$26.0 B Estimate for all states: \$36.4 B Average per hospital: \$14.2 million |
| Communit y benefit provided | Total community benefit in 2011: \$62 billion Avg hospital spending on community benefit: \$20.8 million Total | Total "incremental" community benefits (spending beyond what for-profits spend): \$31.6 billion Average "incremental" community benefits per hospital: \$19.2 million | Total "incremental " community benefits (spending beyond what for-profits spend): \$29.4 billion Average "incremental " community benefits per hospital: \$20 million | Total value of community benefits: \$110.9 billion Average per hospital: \$44 million | Total financial assistance: \$16 billion in 2020 Average financial assistance: \$5.8 million | n/a | Total meaningful CB: \$22.4B Average per hospital: \$12.3 M |

| | spending on community health improveme nt: \$4 billion Avg hospital spending on community health improveme nt: \$1.3 million | Total incremental financial assistance: \$9.3 billion Avg incremental financial assistance per hospital: \$5.6 million | Total incremental financial assistance: \$5.6 billion Avg incremental financial assistance per hospital: \$3.8 million | | | | |
|--|---|---|--|--|---|-----|--|
| Tax exemption compared to community benefit | Total community benefit spending exceeds the tax exemption by \$37.4 billion in total and \$12.5 million. The tax exemption exceeds spending on community health improveme nt by \$20.6 billion in total and \$7 million on average. | Total incremental community benefit exceeds tax exemption by \$13 billion in total and \$7.9 million on average. The tax exemption value exceeds incremental financial assistance by \$9.3 billion total and \$5.7 million on average. | Total incremental community benefit exceeds tax exemption by \$11.4 billion in total and \$7.76 million on average. The tax exemption value exceeds incremental financial assistance by \$12.4 billion total and \$8.44 million on average. | Total community benefit exceeds the estimated tax revenue forgone by \$985 billion in total and \$39 million on average. | The total estimated value of tax exemption exceeded total estimated charity care costs by \$12 billion in total and \$4.4 million on average. | n/a | The total tax benefits exceeded community investment by \$3.4B in total and \$2.0 million on average. |

Value of hospital tax exemption methods comparison

| Method | Health Affairs | Johns Hopkins | АНА | KFF | Plummer | Lown Institute |
|-----------------------|---|---|--|--|---|---|
| Federal income tax | Net patient service income from CMS hospital cost reports, applied effective tax rate | Net income from CMS hospital cost reports, using effective tax rate for health care and social assistance corporations. | Net income from CMS hospital cost reports, adjusted for interest paid, state & local taxes paid, system affiliation, prior year losses from past 10 years, gifts deducted | Net income from CMS hospital cost reports, adjusted for interest paid, state & local taxes paid, value of tax-exempt donations and bonds, system affiliation, prior year (and future year) losses from past 10 years | Net income from CMS hospital cost reports, adjusted for interest paid, state & local taxes paid, system affiliation | Net income from CMS hospital cost reports, adjusted for interest paid, state & local taxes paid, prior year losses from 2019- 2021. |
| State income tax | Net income from CMS hospital cost reports | Net income from CMS hospital cost reports | Not included | Net income from CMS hospital cost reports, adjusted for local taxes paid and prior year losses from past 10 years | Net income from CMS hospital cost reports, adjusted for interest paid, local taxes paid, system affiliation | Net income from CMS hospital cost reports, adjusted for local taxes paid and prior year losses from 2019-2021 |
| State and local sales | State-specific tax rate applied to estimated supply & equipment expenditures | Amount spent on medical supplies, from AHA hospital survey | Not included | Amount spent on medical supplies, from AHA hospital survey | Amount spent on medical supplies, from AHA hospital survey | Amount spent on medical supplies, from AHA hospital survey. 2022 data imputed based on prior year values |
| Property | Calculated ratio of property tax to net patient revenue for each state using data reported by for-profit hospitals in hospital cost reports. We then applied the state- specific ratios to the net patient revenues of each hospital. | Calculated ratio of property tax to total revenue for each state using data reported by for- profit hospitals in hospital cost reports. We then applied the state- specific ratios to the revenues of each | Not included | Calculated ratio of property tax to expenses for each state using data reported by for-profit hospitals in hospital cost reports. We then applied the state-specific ratios to the net patient revenues of each nonprofit | Calculated Net Book Value of land, buildings, equipment, and inventory from hospital cost reports, using state average property tax rates | Calculated using county-level property assessment data for hospital-owned parcels, missing data imputed using ratio of property taxes paid to expenses from known hospital property values in the state. Equipment |

| | | hospital. | | hospital. | | costs from hospital cost reports. |
|---|--|---|---|--|--|--|
| Charitable donations | Charitable contributions from IRS 990, excluding government grants and in-kind contributions, assuming 32% marginal tax rate. | Charitable contributions from CMS hospital cost reports, assuming 32% marginal tax rate. | Not included | Charitable contributions from IRS 990, excluding government grants and in- kind contributions, assuming 23% marginal tax rate. | Charitable contributions from CMS cost reports, assuming hospital would receive no donations if for- profit | Charitable contributions from IRS 990, excluding government grants and in-kind contributions, assuming 23% marginal tax rate. |
| Value of tax-exempt bonds | Outstanding long- term liabilities from IRS form 990, assuming marginal tax rate of 25% | Outstanding long-term liabilities from IRS form 990, assuming marginal tax rate of 28% | Outstanding long-term liabilities from CMS cost reports, assuming marginal tax rate of 30% | Outstanding long-term liabilities from IRS form 990, assuming marginal tax rate of 24% | Outstanding long- term liabilities from CMS cost reports, assuming marginal tax rate of 30% | Outstanding long- term liabilities from IRS form 990, assuming marginal tax rate of 30% |
| Revenue forgone from unemploym ent tax exemption | Not included | Not included | Federal unemploymen t tax is calculated assuming an effective federal unemploymen t tax rate of 0.5 percent and a maximum wage base of \$7,000 per employee | Not included | Federal unemployment tax is calculated assuming an effective federal unemployment tax rate of 0.06 percent (accounting for exemption due to paying state FUTA) and a maximum wage base of \$7,000 per employee | Federal unemployment tax is calculated assuming an effective federal unemployment tax rate of 0.06 percent (accounting for exemption due to paying state FUTA) and a maximum wage base of \$7,000 per employee |

Value of hospital community investment

To determine Fair Share spending, we include only the following IRS categories of community benefit that are most likely to have a direct and meaningful impact on community health. (<u>See here for more</u> on why we included only certain categories)

Here is how our definition of meaningful community investment compares to other studies, based on which elements are included.

| Category of community benefit | IRS community benefit definition (Sch H part 1) | Johns Hopkins | AHA | KFF | Lown Institute |
|--|---|--|---------------------------------|--|---------------------------------|
| Financial assistance | | | | | |
| | Source: IRS 990 Sch H Part 1 | Measured both in aggregate and as "incremental" spending beyond what for-profits spend | Source: IRS 990 Sch H Part 1 | Source: CMS hospital cost reports | Source: IRS 990 Sch H Part 1 |
| Unreimbursed Medicaid costs & other means- tested government | | | | | |
| programs | Source: IRS 990 Sch H Part 1 | Measured both in aggregate and as "incremental" spending beyond what for-profits spend | Source: IRS 990 Sch H Part 1 | | |
| Health professions training and research | | | | | \mathbf{C} |
| | Source: IRS 990 Sch H Part 1 | Measured both in aggregate and as "incremental" spending beyond what for-profits spend | Source: IRS 990 Sch H Part 1 | | |

| Subsidized health services | | | | $\mathbf{\mathbf{S}}$ | |
|---|---------------------------------|--|----------------------------------|-----------------------|---|
| | Source: IRS 990 Sch H Part 1 | Measured both in aggregate and as "incremental" spending beyond what for-profits spend | Source: IRS 990 Sch H Part 1 | | Source: IRS 990 Sch H Part 1 |
| Contributions to community groups | | | | \mathbf{C} | |
| | Source: IRS 990 Sch H Part 1 | Measured both in aggregate and as "incremental" spending beyond what for-profits spend | Source: IRS 990 Sch H Part 1 | | Source: IRS 990, Sch H Part 1 Contributions to affiliated universities or physician groups were removed |
| Community building activities (addressing SDOH) | • | • | Source: IRS 990, Sch H Part 2 | 8 | Source: IRS 990, Sch H Part 2 |
| Bad debt attributable to financial assistance | (3) | | IRS 990 Sch H Part 3 | 8 | • |
| Medicare shortfall | | | IRS 990 Sch H Part 3 | | |

Federal & state corporate income tax exemptions

We applied the national corporate income tax rate of 21% and state-specific tax rates to hospital net income from CMS hospital cost reports (HCRIS) for fiscal years ending in 2020-2022.¹ For any hospitals with negative net income, net income was set to \$0.

To estimate taxable net income, we made the following adjustments, based on methods from Plummer (2024) and Godwin (2023):

- Prior year losses going back to 2019 were applied to future years of income for federal and state income tax in states where prior year loss carryover is allowed.²
- Taxes the hospital would have paid and the value of other tax benefits (value of donations, lower interest rate on bonds) were deducted from income.

State corporate income tax rates as applicable to nonprofit hospitals

| State | Corporate income tax rate | Net Loss Carryforward | Source(s) |
|------------|------------------------------------|--|---|
| California | 8.84% | No carryforward for 2020-2022 | State of CA Franchise Tax Board, 2024 |
| | | | <u>Vermeer, 2022</u> |
| Colorado | 4.63% in 2020 4.55% in 2021-22 | No carryforward for 2020-2022 | Colorado General Assembly, 2023 |
| Florida | 4.458% in 2020-21 5.50% in 2022 | carryforward matches federal rules | Florida Department of Revenue, n.d. |
| | | | Florida Department of Revenue, 2021 |
| Georgia | 5.75% | No carryforward for 2020-2022 | Department of Revenue, n.d. |
| Illinois | 9.50% | For 2021-2022 carryforward is limited to \$100,000 | Illinois Department of Revenue, 2024 |
| | | το φ του,ουυ | Illinois Department of Revenue, 2024 |

¹ HCRIS data for this report was pulled on 05-21-2024. Future refreshes of HCRIS data may have updated numbers.

² Prior year loss allowed up to 80% of net income for federal income tax in 2021 and 2022. For 2020, prior year losses had no limit due to a CARES Act provision.

| Indiana | 5.50% in 2020 5.25% in 2021 4.90% in 2022 | No carryforward for 2020-2022 | Indiana Department of Revenue, 2020b |
|----------------|--|---|--|
| lowa | Graduated rate: 6% to 12% in 2020 5.5% to 9.8% in 2021 5.5% to 8.4% in 2022 | No carryforward cap | Iowa Department of Revenue, n.d. Iowa Department of Revenue, n.d. |
| Louisiana | Graduated rate: 4% to 8% in 2020- 2021; 3.5% to 7.5% in 2022 | Carryforward limited to lesser of 72% of loss or 72% of net income | Louisiana Department of Revenue, n.d. Vermeer, 2022 PricewaterhouseCoo per, 2021 |
| Maryland | 8.25% | No carryforward for 2020-2022 | Maryland Department of Commerce, n.d. |
| Massachusetts | 8.00% | No carryforward cap | Tax Foundation, 2024 |
| Michigan | 6.00% | Carryforward capped at 80% of net income for 2021 and 2022 | <u>Michigan Department</u> of Treasury, 2024 <u>Michigan Department</u> of Treasury, 2022 |
| Minnesota | 9.80% | Carryforward limited to 80% of taxable income | Michael, 2015 Minnesota Department of Revenue, 2024 |
| New York | 6.50% in 2020-2021 Graduated rate from 6.5% to 7.25% in 2022 | No carryforward for 2020-2022 | Tax Foundation, 2024New York Department of Taxation and Finance, 2024 |
| North Carolina | 2.50% | Carryforward cannot exceed total taxable income | North Carolina Department of Revenue, n.d. North Carolina |

| | | | <u>General Assembly,</u> 2024 |
|--------------|---|---|--|
| Ohio | Commercial Activity Tax: \$150 for first \$1 million in revenue, 0.26% on gross receipts after \$1 million (no corporate income tax) | n/a | Ohio Department of Taxation, 2024 |
| Oregon | Graduated rate from 6.6% to 7.6% (There is a Commercial Activities Tax but hospitals are exempt) | Carryforward is applicable for 15 years. | Oregon Department of Revenue, n.d. |
| Pennsylvania | 9.99% in 2020-21 8.99% in 2022 | Only 40% of losses may be carried forward | Pennsylvania Department of Revenue, 2021 Pennsylvania Department of Revenue, 2024a Vermeer, 2022 |
| Tennessee | 6.50% | No carryforward cap | <u>Tennessee</u> <u>Department of</u> <u>Revenue, n.d.</u> |
| Texas | n/a (no corporate income tax; gross receipts tax does not apply to hospitals) | n/a | Tax Foundation, 2024 |
| Wisconsin | 7.90% | No carryforward cap | State of WisconsinDepartment ofRevenue, 2023State of WisconsinDepartment ofRevenue, 2024 |

State and local sales tax exemption

We applied state and local sales tax rates to hospital spending on medical supplies, sourced from the American Hospitals Association (AHA) Survey total supply expense. AHA data was available for years 2020-2021. For 2022, we estimated supply expenses based on a given hospitals' previous supply expenses as a share of total operating expenses in prior years. For hospitals with missing AHA data, supply expenses were imputed based on the median share of total operating expenses spent on supplies for other hospitals in that state.

| State | State sales tax rate | Local sales tax rate | Source |
|------------|-------------------------------|--|---|
| California | n/a (hospitals not exempt) | n/a (hospitals not exempt) | California Department of Tax and Fee Administration, 2022 |
| Colorado | 2.90% | Combined sales tax rate ranges from 4.9% to 9.4% depending on municipality | <u>Colorado General</u> <u>Assembly, n.d.</u> <u>Colorado Department</u> <u>of Revenue Taxation</u> <u>Division, 2024</u> |
| Florida | 6.00% | Combined sales tax rate ranges from 6% to 7.5% depending on municipality | <u>Florida Department of</u> <u>Revenue, n.d.</u> <u>Florida Department of</u> <u>Revenue, n.d.</u> |
| Georgia | 4.00% | Combined sales tax rate ranges from 6% to 9% depending on municipality | Department of Revenue, 2024 |
| Illinois | 6.25% | Combined sales tax rate ranges from 6.25% to 9% depending on municipality | Illinois Department of Revenue, 2024 Illinois Department of Revenue, 2024 |
| Indiana | 7.00% | State does not levy any local sales taxes | Indiana Department of Revenue, 2020 Tax Foundation, 2024 |

State local and sales tax rates as applicable to nonprofit hospitals

| lowa | 6.00% | Combined sales tax rate ranges from 6% to 7% depending on municipality | <u>Iowa Department of</u> <u>Revenue, 2022</u> |
|----------------|--|--|--|
| Louisiana | n/a (hospitals not exempt) | n/a (hospitals not exempt) | <u>Louisiana</u> <u>Department of</u> <u>Revenue, 2019</u> |
| Maryland | 6.00% | State does not levy any local sales taxes | Comptroller of Maryland, 2024 Tax Foundation, 2024 |
| Massachusetts | 6.25% | State does not levy any local sales taxes | Massachusetts Department of Revenue, 2024 <u>Tax Foundation,</u> 2024 |
| Michigan | 6.00% | State does not levy any local sales taxes | <u>Michigan Department</u> of Treasury, 2024 |
| Minnesota | 6.88% | Combined sales tax rate ranges from 6.9% to 8.9% depending on municipality | <u>Minnesota</u> <u>Department of</u> <u>Revenue, 2023</u> |
| New York | 4.00% | Combined sales tax rate ranges from 7% to 8.9% depending on municipality | <u>New York</u> <u>Department of</u> <u>Taxation and</u> <u>Finance, 2023</u> |
| North Carolina | 4.75% (hospitals not exempt from sales tax although they may receive a refund later) | Combined sales tax rate of 7.00% (hospitals not exempt from sales tax although they may receive a refund later) | North Carolina Department of Revenue, 2022 |
| Ohio | 5.75% | Combined sales tax rate ranges from 6.5% to 8% depending on municipality | <u>Ohio Department of</u> <u>Taxation, n.d.</u> |
| Oregon | n/a (no sales tax, | n/a (no sales tax, | Oregon Department |

| | corporate activity tax does not apply to hospitals) | corporate activity tax does not apply to hospitals) | of Revenue, n.d. |
|--------------|---|--|--|
| Pennsylvania | 6.00% | By law, a 1% local tax is added to purchases made in Allegheny County, and 2% local tax is added to purchases made in Philadelphia | Pennsylvania Department of Revenue, 2024 |
| Tennessee | 7.00% Counties and regional transit authorities may levy additional sales and use taxes. | Combined sales tax rate ranges from 8.5% to 9.8% depending on municipality | <u>Tennessee</u> <u>Department of</u> <u>Revenue, n.d.</u> |
| Texas | 6.25% | Combined sales tax rate ranges from 6.8% to 8.3% depending on municipality | <u>Texas Comptroller,</u> <u>n.d.</u> |
| Wisconsin | 5.00% | State does not levy any local sales taxes | State of Wisconsin Department of Revenue, 2023 |

Property tax exemption

We accessed municipal-level property assessment data to calculate the value of hospitals' real property tax exemptions and CMS hospital cost report data for equipment and inventory value in states where these are taxed. We assigned parcels to hospitals based on their CMS Care Compare address and allocated other tax-exempt parcels in the same county with the same owner name to that hospital. Parcels with the system owner name only were allocated to the closest hospital in that system. We used property assessment data from 2022 when available or the closest year available. Local property tax rates were obtained from county assessment portals or websites. In Wisconsin, Illinois, and Michigan, property value data was largely unavailable for hospitals, as tax-exempt parcels are not regularly assessed; in these states, most property data was imputed.

Hospitals with property owned by the city or county were marked as having no property tax exemption, including hospitals with property owned by a public entity known as a "Hospital

Authority" (as is common in California, Georgia, and North Carolina). Hospitals with property owned by a for-profit entity (common in Texas) were marked as having no property tax exemption. For hospitals without property assessment data available, we estimated this value using the median ratio of property tax exemption to operating expenses for that state.

In Wisconsin, Illinois, and Michigan, property value data was largely unavailable for hospitals, as tax-exempt parcels are not regularly assessed. For Wisconsin, the estimated value of hospital property was obtained for 41% of hospitals through municipal data that requires hospitals to report fair market value ranges per-parcel³; the rest were imputed based on the national median ratio of property tax exemption to operating expenses. In Illinois, the value of the property tax exemption for 40% of hospitals was obtained through municipal data that requires hospitals to report the value of their property tax exemption⁴; the rest were imputed based on the national median ratio. For Michigan hospitals, all values were imputed based on the national median ratio.

Lower interest payment on bonds

Nonprofit hospitals benefit from being able to issue tax-exempt bonds because they can offer a lower interest rate to investors. To estimate the difference between taxable and non-taxable interest rates, we first estimated the average corporate interest rate from 2020-2022 using the Moody's Seasoned AAA and BAA Indices (Federal Reserve Bank of St Louis, 2024b, 2024a). We then calculated the interest rate for nonprofit hospital bonds, assuming that average bond interest rates for nonprofit hospitals are equal to the after-tax bond interest rates among for-profit hospitals. We used a marginal tax rate of 30%, following the method used by Ernst & Young (Ernst & Young, 2022). The difference between the average corporate bond yield and tax-exempt bond yield was applied to hospitals' total outstanding bond liability, obtained from IRS Form 990 Part X Line 20.

For hospitals that filed under the same tax ID, we prorated bond values based on the hospital's share of hospital system patient revenue. For hospitals that filed with a Schedule E on their 990, we imputed bond values based on the median ratio of tax-exempt bond value as a share of total expenses. In some cases, hospitals reported no bond liability on their 990 but reported bond liability on a 990 for a related healthcare nonprofit organization; when the bond issuances for the hospital or system could be confirmed, we applied the imputed bond ratio.

Charitable donations

If hospitals were for-profit, donations to the hospital would not be tax-exempt, which is a considerable benefit to hospitals. We used charitable donations from IRS Form 990 Part VIII, excluding government grants and non-cash contributions, following Godwin (2023) and

³ Using forms PC-220 and PC-220A (Source)

⁴ Using forms PTAX-300-HA or PTAX-300 (<u>Source</u>)

Rosenbaum (2015). Following the methods of Godwin (2023), we assumed a marginal tax rate of 23%, which was applied to the total donation value. For hospitals that file under the same tax ID, we prorated charitable donation values based on share of system revenue. For hospitals that included a Schedule E on their 990, we estimated the amount of donations for the hospital based on the share of program revenue from patient services, discounting donations meant for the university.

Federal unemployment tax

Hospitals are exempt from paying federal unemployment tax (FUTA) as a result of their nonprofit status. We calculated hospitals' forgone FUTA using their number of full-time employees from hospital cost reports, multiplying by \$7,000 per employee and then by the 0.06% rate. We assumed hospitals paid state unemployment taxes and took the full exemption from FUTA, following Plummer et al (2024) and Ernst & Young (2022).

Appendix B: Additional results

Individual hospital results

Hospitals with highest incomes

Federal income tax represented a large share of the total hospital tax exemption; however, hospitals' net income varied considerably. While some hospitals made hundreds of millions each year, others were in the red every year. Here are the hospitals with the greatest net income on average across fiscal year ending 2020-2022, based on hospital cost reports.

| Hospital | Net income (average, 2020-2022) |
|--|------------------------------------|
| Mayo Clinic Hospital, Saint Marys Campus (MN)* | \$1.01 billion |
| IU Health Methodist Hospital (IN)^ | \$555 million |
| Cleveland Clinic Main Campus (OH)* | \$525 million |
| Tisch Hospital (NY)^ | \$517 million |
| Cedars-Sinai Medical Center (CA) | \$486 million |
| AdventHealth Orlando (FL)*^ | \$432 million |
| Baylor University Medical Center (TX)* | \$412 million |
| New York-Presbyterian Hospital (NY)^ | \$409 million |
| Orlando Health Orlando Regional Medical Center (FL)*^ | \$404 million |
| Hospital of the University of Pennsylvania (PA) [^] | \$384 million |

*IRS information prorated across multiple hospitals based on share of system revenue ^Includes more than one hospital campus within same CMS ID

Hospitals that made at least \$1 billion in a single year

Six of the hospitals in our data set made \$1 billion at least one year from 2020-2022. The Mayo Clinic is included twice on this list because they made over \$1 billion in two of the three years studied. Data was sourced from CMS hospital cost reports.

| Hospital | Year | Net income |
|---|------|---------------|
| New York-Presbyterian Hospital (NY)^ | 2021 | \$1.5 billion |
| Cleveland Clinic Main Campus (OH)* | 2021 | \$1.3 billion |
| Evanston Hospital (IL)^ | 2021 | \$1.3 billion |
| Carle Health Methodist Hospital (IL) | 2020 | \$1.2 billion |
| Mayo Clinic Hospital, Saint Marys Campus (MN)* | 2022 | \$1.1 billion |
| IU Health Methodist Hospital (IN)^ | 2020 | \$1.1 billion |
| Mayo Clinic Hospital, Saint Marys Campus (MN)* | 2021 | \$1.1 billion |

*IRS information prorated across multiple hospitals based on share of system revenue ^Includes more than one hospital campus within same CMS ID

Hospitals with the highest donations

The value of tax-exempt donations represent about one-tenth of the overall tax exemption, with a handful of hospitals making up an outsized proportion of the total. The following hospitals reported receiving the largest benefit of tax-exempt donations on average from 2020-2022. Data was sourced from IRS Form 990, excluding government grants and in-kind contributions. For hospitals that file as a group, donations were prorated based on hospitals' share of system revenue. The average marginal tax rate for donors was applied to estimate the benefit of tax-exempt status on donations.

| Hospital | Benefit of tax-exempt donations (average, 2020-2022) |
|--|--|
| Massachusetts General Hospital (MA)* | \$294 million |
| Brigham and Women's Hospital (MA)* | \$224 million |
| Hospital of the University of Pennsylvania (PA)^ | \$121 million |
| Cedars-Sinai Medical Center (CA) | \$65 million |
| Boston Children's Hospital (MA) | \$63 million |
| Nationwide Children's Hospital (OH)* | \$48 million |
| Newton-Wellesley Hospital (MA)* | \$45 million |
| Mayo Clinic Hospital, Saint Marys Campus (MN)* | \$43 million |
| Salem Hospital (MA)* | \$42 million |

| Children's Hospital of Philadelphia (PA)^ | \$40 million |
|---|--------------|
| Cincinnati Children's Hospital (OH)^ | \$35 million |
| Tisch Hospital (NY)^ | \$33 million |
| Cleveland Clinic Main Campus (OH)* | \$32 million |
| New York-Presbyterian Hospital (NY)^ | \$31 million |

*IRS information prorated across multiple hospitals based on share of system revenue ^Includes more than one hospital campus within same CMS ID

Hospitals with highest overall tax benefits

Academic medical centers in major metropolitan areas such as Boston, Los Angeles, New York City, and Orlando enjoyed notable annual tax benefits as a result of their nonprofit status. The following hospitals reflect those with the greatest annual tax benefit on average from 2020-2022. These hospitals make up about 12% of the total annual tax exemption across all 20 states.

| Hospital | Per year tax benefit (average, 2020-2022) |
|--|--|
| New York-Presbyterian Hospital (NY)^ | \$422 million |
| Massachusetts General Hospital (MA)* | \$415 million |
| Mayo Clinic Hospital, Saint Marys Campus (MN)* | \$338 million |
| Cleveland Clinic Main Campus (OH)* | \$307 million |
| Brigham and Women's Hospital (MA)* | \$292 million |
| Tisch Hospital (NY)^ | \$288 million |
| Hospital of the University of Pennsylvania (PA)^ | \$255 million |
| IU Health Methodist Hospital (IN)^ | \$231 million |
| AdventHealth Orlando (FL)*^ | \$230 million |
| Cedars-Sinai Medical Center (CA) | \$218 million |

*IRS information prorated across multiple hospitals based on share of system revenue ^Includes more than one hospital campus within same CMS ID

Hospitals with highest overall community investment

Of the ten hospitals with highest community investment spending, five are in New York state. Three of the hospitals with the greatest average annual tax exemption also reported the most spending on community investment.

| Hospital | Per year community investment spending (average, 2020-2022) | |
|--|---|--|
| New York-Presbyterian Hospital (NY)^ | \$363 million | |
| North Shore University Hospital (NY)^ | \$269 million | |
| Long Island Jewish Medical Center (NY)^ | \$237 million | |
| AdventHealth Orlando (FL)*^ | \$215 million | |
| Tisch Hospital (NY)^ | \$195 million | |
| Grady Memorial Hospital (GA)*^ | \$191 million | |
| The Mount Sinai Hospital (NY)^ | \$185 million | |
| Ochsner Medical Center - New Orleans (LA)*^ | \$158 million | |
| Houston Methodist Hospital (TX) | \$149 million | |
| Northside Hospital Atlanta (GA)* | \$144 million | |

*IRS information prorated across multiple hospitals based on share of system revenue ^Includes more than one hospital campus within same CMS ID

State results

Breakdown of tax benefits by state and category, average per year 2020-2022

| State | TE Component | Total \$ | % of total |
|------------|--------------------|---------------|------------|
| | Federal income tax | \$982 million | 35% |
| | State income tax | \$480 million | 17% |
| | Property tax | \$721 million | 26% |
| | Sales tax | \$0 | 0% |
| | Donations | \$385 million | 14% |
| | Bonds | \$234 million | 8% |
| California | FUTA | \$11 million | 0.4% |

| | Total | \$2.8 billion | 100% |
|----------|--------------------|---------------|------|
| | Federal income tax | \$160 million | 28% |
| | State income tax | \$36 million | 6% |
| | Property tax | \$205 million | 36% |
| | Sales tax | \$111 million | 19% |
| | Donations | \$28 million | 5% |
| | Bonds | \$29 million | 5% |
| | FUTA | \$2 million | 0.3% |
| Colorado | Total | \$571 million | 100% |
| | Federal income tax | \$533 million | 32% |
| | State income tax | \$124 million | 7% |
| | Property tax | \$311 million | 18% |
| | Sales tax | \$426 million | 25% |
| | Donations | \$111 million | 7% |
| | Bonds | \$176 million | 10% |
| | FUTA | \$7 million | 0.4% |
| Florida | Total | \$1.7 billion | 100% |
| | Federal income tax | \$539 million | 41% |
| | State income tax | \$157 million | 12% |
| | Property tax | \$154 million | 12% |
| | Sales tax | \$252 million | 19% |
| | Donations | \$139 million | 11% |
| | Bonds | \$59 million | 4% |
| | FUTA | \$5 million | 0.3% |
| Georgia | Total | \$1.3 billion | 100% |

| <u> </u> | 1 | | |
|-----------|--------------------|---------------|------|
| | Federal income tax | \$819 million | 36% |
| | State income tax | \$332 million | 15% |
| | Property tax | \$448 million | 20% |
| | Sales tax | \$402 million | 18% |
| | Donations | \$135 million | 6% |
| | Bonds | \$126 million | 6% |
| | FUTA | \$7 million | 0.3% |
| Illinois | Total | \$2.3 billion | 100% |
| | Federal income tax | \$654 million | 51% |
| | State income tax | \$173 million | 13% |
| | Property tax | \$223 million | 17% |
| | Sales tax | \$149 million | 12% |
| | Donations | \$15 million | 1% |
| | Bonds | \$64 million | 5% |
| | FUTA | \$3 million | 0.2% |
| Indiana | Total | \$1.3 billion | 100% |
| | Federal income tax | \$71 million | 21% |
| | State income tax | \$38 million | 12% |
| | Property tax | \$113 million | 34% |
| | Sales tax | \$66 million | 20% |
| | Donations | \$27 million | 8% |
| | Bonds | \$15 million | 5% |
| | FUTA | \$1 million | 0.4% |
| lowa | Total | \$331 million | 100% |
| Louisiana | Federal income tax | \$189 million | 31% |

| | State income tax | \$78 million | 13% |
|---------------|--------------------|---------------|------|
| | Property tax | \$270 million | 44% |
| | Sales tax | \$0 | 0% |
| | Donations | \$46 million | 7% |
| | Bonds | \$34 million | 6% |
| | FUTA | \$2 million | 0.4% |
| | | | |
| | Total | \$619 million | 100% |
| | Federal income tax | \$132 million | 23% |
| | State income tax | \$57 million | 10% |
| | Property tax | \$158 million | 27% |
| | Sales tax | \$149 million | 25% |
| | Donations | \$29 million | 5% |
| | Bonds | \$58 million | 10% |
| | FUTA | \$4 million | 0.6% |
| Maryland | Total | \$587 million | 100% |
| | Federal income tax | \$143 million | 9% |
| | State income tax | \$59 million | 4% |
| | Property tax | \$385 million | 23% |
| | Sales tax | \$229 million | 14% |
| | Donations | \$782 million | 47% |
| | Bonds | \$77 million | 5% |
| | FUTA | \$6 million | 0.3% |
| Massachusetts | Total | \$1.7 billion | 100% |
| | Federal income tax | \$333 million | 32% |
| Michigan | State income tax | \$101 million | 10% |

| | Property tax | \$265 million | 25% |
|----------------|--------------------|----------------|------|
| | Sales tax | \$218 million | 21% |
| | Donations | \$48 million | 5% |
| | Bonds | \$73 million | 7% |
| | FUTA | \$6 million | 0.6% |
| | Total | \$1.04 billion | 100% |
| | Federal income tax | \$325 million | 37% |
| | State income tax | \$168 million | 19% |
| | Property tax | \$95 million | 11% |
| | Sales tax | \$136 million | 16% |
| | Donations | \$93 million | 11% |
| | Bonds | \$54 million | 6% |
| | FUTA | \$4 million | 0.4% |
| Minnesota | Total | \$876 million | 100% |
| | Federal income tax | \$292 million | 12% |
| | State income tax | \$96 million | 4% |
| | Property tax | \$723 million | 31% |
| | Sales tax | \$950 million | 40% |
| | Donations | \$210 million | 9% |
| | Bonds | \$85 million | 4% |
| | FUTA | \$14 million | 0.6% |
| New York | Total | \$2.4 billion | 100% |
| | Federal income tax | \$262 million | 39% |
| | State income tax | \$32 million | 5% |
| North Carolina | Property tax | \$109 million | 16% |

| | Sales tax | \$202 million | 30% |
|--------------|-----------------------------|---------------|------|
| | Donations | \$16 million | 2% |
| | Bonds | \$53 million | 8% |
| | FUTA | \$4 million | 0.6% |
| | Total | \$678 million | 100% |
| | Federal income tax | \$887 million | 41% |
| | State gross receipts tax | \$111 million | 5% |
| | Property tax | \$419 million | 19% |
| | Sales tax | \$393 million | 18% |
| | Donations | \$172 million | 8% |
| | Bonds | \$185 million | 9% |
| | FUTA | \$8 million | 0.4% |
| Ohio | Total | \$2.2 billion | 100% |
| | Federal income tax | \$114 million | 38% |
| | State income tax | \$44 million | 15% |
| | Property tax | \$86 million | 29% |
| | Sales tax | \$0 | 0% |
| | Donations | \$17 million | 6% |
| | Bonds | \$38 million | 13% |
| | FUTA | \$2 million | 0.5% |
| Oregon | Total | \$301 million | 100% |
| | Federal income tax | \$594 million | 29% |
| | State income tax | \$315 million | 15% |
| Pennsylvania | Property tax | \$326 million | 16% |

| i | 1 | T | I |
|-----------|---------------------|----------------|------|
| | Sales tax | \$426 million | 21% |
| | Donations | \$241 million | 12% |
| | Bonds | \$137 million | 7% |
| | FUTA | \$9 million | 0.4% |
| | Total | \$2.05 billion | 100% |
| | Federal income tax | \$68 million | 16% |
| | State income tax | \$22 million | 5% |
| | Property tax | \$106 million | 26% |
| | Sales tax | \$171 million | 41% |
| | Donations | \$30 million | 7% |
| | Bonds | \$15 million | 4% |
| | FUTA | \$3 million | 0.7% |
| Tennessee | Total | \$415 million | 100% |
| | Federal income tax | \$856 million | 40% |
| | State franchise tax | \$88 million | 4% |
| | Property tax | \$525 million | 25% |
| | Sales tax | \$449 million | 21% |
| | Donations | \$88 million | 4% |
| | Bonds | \$104 million | 5% |
| | FUTA | \$7 million | 0.4% |
| Texas | Total | \$2.1 billion | 100% |
| | Federal income tax | \$390 million | 46% |
| | State income tax | \$159 million | 19% |
| | Property tax | \$114 million | 13% |
| Wisconsin | Sales tax | \$91 million | 11% |

| | Donations | \$39 million | 5% |
|-------|--------------------|-----------------|------|
| | Bonds | \$51 million | 6% |
| | FUTA | \$3 million | 0.4% |
| | Total | \$847 million | 100% |
| | Federal income tax | \$8.3 billion | 32% |
| | State income tax | \$2.7 billion | 10% |
| | Property tax | \$5.8 billion | 22% |
| | Sales tax | \$4.8 billion | 19% |
| | Donations | \$2.7 billion | 10% |
| | Bonds | \$1.7 billion | 6% |
| | FUTA | \$106 million | 0.4% |
| Total | Total | \$26.02 billion | 100% |

Breakdown of community investment by state and category, average per year 2020-2022

| State | Community investment component | Total spending | % of total |
|------------|--------------------------------|----------------|------------|
| | Financial assistance | \$753 million | 41% |
| | Community health improvement | \$316 million | 17% |
| | Subsidized services | \$504 million | 28% |
| | Contributions | \$210 million | 12% |
| | Community building | \$37 million | 2% |
| California | Total | \$1.8 billion | 100% |
| Colorado | Financial assistance | \$141 million | 50% |

| | Community health improvement | \$46 million | 16% |
|----------|------------------------------|---------------|------|
| | Community health improvement | | |
| | Subsidized services | \$79 million | 28% |
| | Contributions | \$16 million | 6% |
| | Community building | \$3 million | 0.9% |
| | Total | \$285 million | 100% |
| | Financial assistance | \$1.2 billion | 67% |
| | Community health improvement | \$217 million | 12% |
| | Subsidized services | \$230 million | 13% |
| | Contributions | \$34 million | 2% |
| | Community building | \$121 million | 7% |
| Florida | Total | \$1.8 billion | 100% |
| | Financial assistance | \$1.2 billion | 67% |
| | Community health improvement | \$88 million | 5% |
| | Subsidized services | \$492 million | 27% |
| | Contributions | \$15 million | 0.8% |
| | Community building | \$4 million | 0.2% |
| Georgia | Total | \$1.8 billion | 100% |
| | Financial assistance | \$617 million | 44% |
| | Community health improvement | \$124 million | 9% |
| | Subsidized services | \$564 million | 40% |
| | Contributions | \$94 million | 7% |
| | Community building | \$18 million | 1.3% |
| Illinois | Total | \$1.4 million | 100% |
| | Financial assistance | \$328 million | 47% |
| Indiana | Community health improvement | \$155 million | 22% |

| | Subsidized services | \$168 million | 24% |
|---------------|------------------------------|---------------|------|
| | Contributions | \$34 million | 5% |
| | Community building | \$17 million | 2% |
| | Total | \$702 million | 100% |
| | Financial assistance | \$61 million | 29% |
| | Community health improvement | \$17 million | 8% |
| | Subsidized services | \$91 million | 43% |
| | Contributions | \$39 million | 18% |
| | Community building | \$4 million | 2% |
| lowa | Total | \$212 million | 100% |
| | Financial assistance | \$105 million | 26% |
| | Community health improvement | \$29 million | 7% |
| | Subsidized services | \$235 million | 58% |
| | Contributions | \$37 million | 9% |
| | Community building | \$1 million | 0.2% |
| Louisiana | Total | \$407 million | 100% |
| | Financial assistance | \$318 million | 28% |
| | Community health improvement | \$215 million | 19% |
| | Subsidized services | \$551 million | 49% |
| | Contributions | \$16 million | 1.4% |
| | Community building | \$30 million | 3% |
| Maryland | Total | \$1.1 billion | 100% |
| | Financial assistance | \$310 million | 31% |
| | Community health improvement | \$112 million | 11% |
| Massachusetts | Subsidized services | \$473 million | 48% |

| Contributions | \$47 million | 5% |
|------------------------------|---|--|
| PILOT payments | \$30 million | 3% |
| Community building | \$18 million | 2% |
| Total | \$990 million | 100% |
| Financial assistance | \$197 million | 39% |
| Community health improvement | \$69 million | 14% |
| Subsidized services | \$212 million | 42% |
| Contributions | \$18 million | 4% |
| Community building | \$8 million | 2% |
| Total | \$505 million | 100% |
| Financial assistance | \$173 million | 33% |
| Community health improvement | \$70 million | 13% |
| Subsidized services | \$256 million | 49% |
| Contributions | \$14 million | 3% |
| Community building | \$6 million | 1% |
| Total | \$519 million | 100% |
| Financial assistance | \$786 million | 23% |
| Community health improvement | \$600 million | 17% |
| Subsidized services | \$2.03 billion | 58% |
| Contributions | \$43 million | 1% |
| Community building | \$20 million | 0.6% |
| Total | \$3.5 billion | 100% |
| Financial assistance | \$776 million | 81% |
| Community health improvement | \$43 million | 4.48% |
| Subsidized services | \$84 million | 9% |
| | PILOT payments Community building Total Financial assistance Community health improvement Subsidized services Contributions Community building Total Financial assistance Community building Total Financial assistance Community health improvement Subsidized services Contributions Contributions Community building Total Financial assistance Community building Total Financial assistance Community health improvement Subsidized services Contributions Community health improvement Subsidized services Contributions Community building Total Financial assistance Community building Total Financial assistance Community building Total Financial assistance Community health improvement | PILOT payments\$30 millionCommunity building\$18 millionTotal\$990 millionFinancial assistance\$197 millionCommunity health improvement\$69 millionSubsidized services\$212 millionContributions\$18 millionCommunity building\$8 millionTotal\$505 millionFinancial assistance\$173 millionCommunity building\$8 millionTotal\$505 millionFinancial assistance\$173 millionCommunity health improvement\$70 millionSubsidized services\$256 millionContributions\$14 millionCommunity health improvement\$70 millionSubsidized services\$256 millionContributions\$14 millionCommunity building\$6 millionTotal\$519 millionFinancial assistance\$786 millionCommunity health improvement\$600 millionSubsidized services\$2.03 billionContributions\$43 millionCommunity building\$20 millionTotal\$3.5 billionFinancial assistance\$776 millionCommunity building\$20 millionTotal\$3.5 billion |

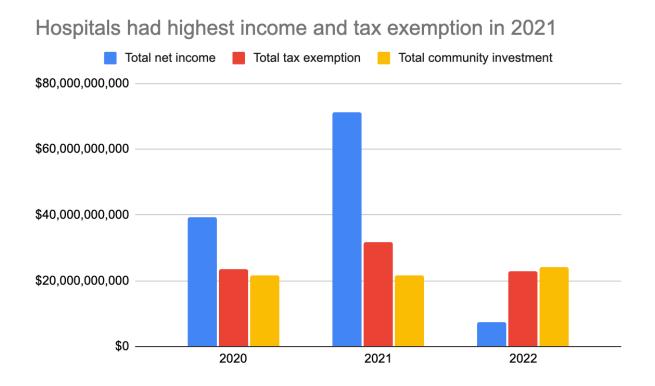
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|--------------|------------------------------|---------------|------|
| | Contributions | \$44 million | 5% |
| | Community building | \$13 million | 1% |
| | Total | \$960 million | 100% |
| | Financial assistance | \$475 million | 43% |
| | Community health improvement | \$208 million | 19% |
| | Subsidized services | \$307 million | 28% |
| | Contributions | \$97 million | 9% |
| | Community building | \$11 million | 1.0% |
| Ohio | Total | \$1.1 billion | 100% |
| | Financial assistance | \$196 million | 45% |
| | Community health improvement | \$53 million | 12% |
| | Subsidized services | \$159 million | 37% |
| | Contributions | \$17 million | 4% |
| | Community building | \$7 million | 2% |
| Oregon | Total | \$432 million | 100% |
| | Financial assistance | \$359 million | 27% |
| | Community health improvement | \$223 million | 17% |
| | Subsidized services | \$672 million | 51% |
| | Contributions | \$59 million | 4% |
| | Community building | \$14 million | 1% |
| Pennsylvania | Total | \$1.3 billion | 100% |
| | Financial assistance | \$526 million | 75% |
| | Community health improvement | \$26 million | 4% |
| | Subsidized services | \$133 million | 19% |
| Tennessee | Contributions | \$15 million | 2% |

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|-----------|------------------------------|----------------|------|
| | Community building | \$5 million | 0.7% |
| | Total | \$706 million | 100% |
| | Financial assistance | \$1.9 billion | 82% |
| | Community health improvement | \$115 million | 5% |
| | Subsidized services | \$225 million | 10% |
| | Contributions | \$86 million | 4% |
| | Community building | \$11 million | 0.5% |
| Texas | Total | \$2.4 billion | 100% |
| | Financial assistance | \$156 million | 34% |
| | Community health improvement | \$61 million | 13% |
| | Subsidized services | \$202 million | 44% |
| | Contributions | \$24 million | 5% |
| | Community building | \$14 million | 3% |
| Wisconsin | Total | \$457 million | 100% |
| | Financial assistance | \$10.6 billion | 47% |
| | Community health improvement | \$2.8 billion | 12% |
| | Subsidized services | \$7.7 billion | 34% |
| | Contributions | \$961 million | 4% |
| | Community building | \$362 million | 2% |
| Total | Total | \$22.4 billion | 100% |
| | • | | |

Trends in Fair Share spending

Year by year comparison of hospital tax benefits and community investment

The total value of hospital tax benefits varied depending on hospitals' net income by year. For example, hospitals in these states received a total of \$80 billion in positive net income in 2021, compared to \$48 billion in 2020 and \$33 billion in 2022, resulting in a higher tax exemption value that year. In almost every state, the tax exemption value was highest in 2021. Community investment spending was more stable across years, ranging from \$21.5 billion in 2020 to \$24.2 billion in 2022.



Appendix C: State policies around financial assistance and community benefit

A summary of notable state policies regulating hospital financial assistance policies and community benefit requirements, and other medical debt protections. Unless otherwise specified, sources are:

- National Academy for State Health Policy, 2024
- Commonwealth Fund, 2023
- Community Catalyst, 2023

| State | Financial assistance requirements and collection regulations | Community benefit spending and reporting requirements |
|------------|--|---|
| California | General acute care hospitals required to provide free or discounted care for patients making up to 400% FPL, depending on insurance status and size of medical bill (increased from 350% to 400% in 2022). | Hospitals required to submit their community health needs assessment and community benefit plan to the state, including economic value of community benefits and how community needs are being addressed. |
| | Hospitals not allowed to consider the monetary assets of a patient in determining eligibility for both charity care and discount payment policies. Prohibition of medical debt on credit reports or primary care liens. Wage garnishments are prohibited for patients eligible for financial assistance and limited for others. | Hospitals also required to submit an annual equity report to the department. This equity report must include, among other things, an analysis of health status and access to care disparities on the basis of specified categories, including age, sex, and race, and a health equity plan to reduce disparities (passed in 2022) |
| Colorado | Hospitals required to offer discounted care for patients with household income up to 250% FPL. Hospitals required to screen all uninsured patients for financial assistance, and all insured patients upon request before sending debt to collections or pursuing an extraordinary collection action. Medical debt is not allowed to be included on credit reports. Foreclosure on primary residence for medical debt is prohibited. | Hospitals required to report community benefit spending on specific categories such as behavioral health, financial assistance, and investments in the social determinants of health, and how this spending directly corresponds to a community-identified health need. Hospitals must present their community benefit plan to the broader community and solicit feedback at a public meeting each year. State Department of Health Care Policy and Financing prepares an annual report including a summary of the |

| | | estimated federal, state, and property tax exemptions received by each hospital. (effective 2023) |
|----------|--|---|
| Florida | Hospitals may receive reimbursements through state uncompensated care programs if they provide 2% of inpatient care as charity care to uninsured patients with family income under 100% FPL. Limitations on liens and wage garnishment for medical debt. Undocumented immigrants ineligible for financial assistance. | none |
| Georgia | Disproportionate Share Hospitals must provide free care patients with income below 125% FPL and free or discounted care for patients between 125% - 200% FPL, until their charity care expenditures equal its allocations from the Indigent Care Trust Fund. | Certificate of Need regulations allow state regulators to take financial assistance into account when considering hospital expansions. |
| Illinois | Acute care hospitals must give free care to uninsured patients with family incomes up to 200% FPL for all charges over \$150 and discount charges over \$150 for uninsured patients with a family income between 200% and 600% FPL. As of 2024, hospitals must screen all uninsured patients for financial assistance at the "earliest reasonable moment" and insured patients upon request. Hospitals cannot place liens or garnish wages for uninsured patients with medical debt. Hospitals prohibited from discriminating based on citizenship status for financial assistance eligibility | Non-profit hospitals must submit community benefits plans with a description of the activities the hospital is undertaking to address health equity, reduce health disparities, and improve community health. Hospitals must also report how many financial assistance applications were received, processed, and granted. Hospitals are required to spend at least as much on community benefits as the value of their property tax exemption (Note: Lown Institute researchers found this property tax exemption data extremely difficult to obtain.) |
| Indiana | No financial assistance eligibility | Requires hospitals to file a copy of Form |

| | requirements, but hospitals may receive reimbursement through state Indigent program for certain patients under 75% FPL | 990 Schedule H with the state. |
|---------------|---|---|
| Iowa | Financial assistance requirements only apply county public hospitals, not private nonprofits. | none |
| | Liens and foreclosures on homes to collect medical debt are limited. | |
| Louisiana | Designated state-supported hospitals must provide free care to patients below 200% FPL, or, if uninsured, have incurred medical expenses more than 20% of income. In the case of medical debt from | none |
| | catastrophic or terminal illness or injury, there may be no forced sale of the patient's home to satisfy the debt. | |
| Maryland | Free care for patients with family income over 200% FPL, discounted care for patients with family income 200-500% FPL depending on size of medical bill. Hospitals are not allowed to consider a household's monetary assets in determining eligibility for free and | Nonprofit hospitals are required to submit an annual report on community benefit spending, including: hospital activities to address identified community health needs, the cost of each activity, and a list of tax exemptions the hospital claimed, among other details. |
| | reduced-cost care under the hospital's financial assistance policy. Hospitals are required to screen patients for financial assistance before sending debt to collections, by asking all patients to sign an information sheet upon discharge notifying them about financial assistance availability. Hospitals required to use a uniform financial assistance application created by the state. | Hospitals are required to report the number of financial assistance applications completed, approved, and denied; number of patients with whom the hospital has written off bad debt; and number of patients sued by the hospital or hospital's debt collector. |
| Massachusetts | Both nonprofit and for-profit hospitals must offer free care and do so at a rate that they "maintain or increase | Hospitals asked to submit community report including their spending on programs to specifically address |

| | the percentage of gross patient service revenues allocated to free care." Hospitals must also disseminate copies of FAPs to patients. Hospitals can get reimbursed from the Health Safety Net for unreimbursed care provided to patients based on their household income and size of the medical bill. Hospitals are not allowed to collect on medical debt for patients with income up to 150% of FPL. | community health needs identified in the Community Health Needs Assessment, as well as financial assistance. Boston has a voluntary system of PILOT payments (payment in lieu of taxes) that asks large nonprofits such as hospitals and universities to pay a stipend to the city, to help pay for things like water, fire fighters, sewage, etc. Other cities in Massachusetts also have these payment plans. |
|-----------|--|---|
| Michigan | none | none |
| Minnesota | Beginning November 1, 2023, all uninsured patients, and patients whose insurance status is unknown, must be screened for eligibility for financial assistance. No set income eligibility levels. Hospitals may not engage in certain collection actions or accept a credit card payment of over \$500 for the medical debt owed to the hospital until the hospital determines the patient is ineligible for charity care. Hospitals must offer a reasonable payment plan to patients who are unable to pay the full amount of their bill before pursuing the debt in litigation, garnishing patient wages, or referring debt to a collection agency. Medical debt cannot be included on credit reports. | Hospitals are required to report their community benefit spending to the state, including a breakout of spending by category and connection to community health needs (updated 2024). |
| New York | Participation in state Indigent Care Pool requires providing financial assistance to patients with family income under 300% FPL, depending on insurance coverage. Patients who face out-of-pocket medical costs over 10% of their | Hospitals must report number of financial assistance applications, approvals, and denials, with demographic breakouts. |

| | income in the past year are eligible for assistance. Hospitals required to use a uniform financial assistance application created by the state. Liens and wage garnishments for medical debt are prohibited. Legal actions to collect medical debt against patients making up to 400% FPL are prohibited. | |
|----------------|---|--|
| North Carolina | Hospitals must implement the following policies in order to receive state-directed Medicaid payments: Provide discounts on medical bills of between 50-100% for patients with incomes at or below 300% FPL, with the amount of the discount varying based on the patient's income. Implement a policy for presumptive eligibility to automatically enroll patients into financial assistance programs No selling the debt of consumers with incomes at or below 300% FPL to debt collectors No reporting a patient's debt covered by these policies to a credit reporting agency No liens on primary residence or wage garnishments to collect on medical debt | |
| Ohio | Hospitals must offer free care to patients at or below 100% FPL and can request reimbursement for care provided through Hospital Care Assurance Program (HCAP) Hospitals participating in the Hospital Care Assurance Program (HCAP) | Hospitals required to report the number of patients that received financial assistance and the amount of spending on financial assistance and bad debt. |

| | must have a post-billing procedure for determining the individual's income and canceling the charges if the individual is found to qualify for services. Hospitals are prohibited from foreclosing on a primary residence due to medical bills. | |
|-----------|---|--|
| Oregon | All nonprofit hospitals must provide free care to those with household incomes of up to 200% FPL and discounted care up to 400% FPL, using sliding scale specified by the state. Starting July 2024, hospitals are required to screen patients for presumptive eligibility for financial assistance if the patient is uninsured, enrolled in Medicaid, or owes more than \$500. Screening must happen before the patient is issued a bill. Wage garnishments are limited. Wage garnishment for medical debt is prohibited. | Hospitals are required to report their community benefit spending to the state by facility each year, broken out by spending category Hospitals required to report the number of financial assistance applications received, approved, denied, number of patients sent to collections, and number of extraordinary collection actions pursued. Hospitals are required to spend above a minimum amount set by the state. The threshold is based on hospitals' prior uncompensated care spending, net patient revenue, and operating margin. (Oregon Health Authority) Pennsylvania hospitals are required to meet certain criteria to be tax-exempt, including providing "uncompensated goods or services at least equal to 75% of the institution's net operating income |
| | | but not less than 3% of the institution's total operating expenses." Taxing districts have the right to sue nonprofit hospitals to revoke property tax exemption if they believe they are not fulfilling all criteria for purely public charities. (Pennsylvania General Assembly) |
| Tennessee | Hospitals are required to offer discounted care to uninsured patients, limited to 175% of the cost of services. | |

| Texas | Free care must be offered by all nonprofit hospitals except those in counties with populations under 50,000 and have been designated a health professional shortage area. Hospitals must make patients under 200% FPG eligible for free care. Wage garnishments or foreclosure on primary residence for medical debt is prohibited. | Hospital community benefit spending must fulfill one of these standards: Exceed the total amount of their tax exemption, not including federal income tax Exceed 5% of net patient revenue Be provided at a level "reasonable in relation to the community needs" |
|-----------|--|--|
| Wisconsin | No wage garnishment for medical debt for patients under 100% FPL; garnishment amount is limited for other patients. | |