



December 17, 2025

Mr. Jimmy Witcosky
Oklahoma Health Care Authority
4345 N. Lincoln Blvd.
Oklahoma City, Oklahoma 73105

To the Oklahoma Health Care Authority (OHCA):

We have completed our examination of the Oklahoma State Disproportionate Share Hospital (DSH) Program operation as related to the DSH Payments Final Rule (DSH Rule) and have issued our report dated December 17, 2025. In connection with our examination engagement, we noted the following matters which we would like to bring to your attention.

HOSPITAL-SPECIFIC DSH PAYMENT LIMIT

The following providers received DSH payments that exceeded their hospital-specific DSH limit calculated under the DSH Rule in MSP rate year 2022:

Hospital	DSH Payments Received	Calculated Hospital-Specific Limit	DSH Payment Over Limit
Adair County HC INC	\$ 113,582.00	\$ 65,014.00	\$ 48,568.00
Eastern Oklahoma Medical Center	\$ 153,392.00	\$ (33,448.00)	\$ 153,392.00
Hillcrest Hospital Pryor	\$ 140,999.00	\$ 85,219.00	\$ 55,780.00
Hillcrest Medical Center	\$ 4,891,019.00	\$ 455,375.00	\$ 4,435,644.00
Mercy Health Love County	\$ 88,697.00	\$ (132,617.99)	\$ 88,697.00
Mercy Hospital Logan County	\$ 117,420.00	\$ (171,176.94)	\$ 117,420.00
Norman Regional Hospital	\$ 2,016,833.00	\$ 1,124,550.00	\$ 892,283.00
Northeastern Health System	\$ 471,659.00	\$ 379,651.00	\$ 92,008.00
OU Medicine	\$ 20,960,892.00	\$ 20,110,841.00	\$ 850,051.00
Saint Francis Hospital	\$ 4,328,322.00	\$ (5,127,955.00)	\$ 4,328,322.00
Saint Francis Hospital Muskogee INC	\$ 1,309,347.00	\$ (2,063,697.00)	\$ 1,309,347.00
Saint Francis Hospital South	\$ 652,001.00	\$ 283,160.00	\$ 368,841.00
St Anthony Shawnee	\$ 23,577.00	\$ (1,880,121.55)	\$ 23,577.00

RESULTS OF EXPANDED CLAIMS TESTING

We selected three hospitals for additional review of uninsured account details for MSP rate year 2022. The following hospitals were identified as including material accounts with insurance or that were otherwise not eligible for inclusion in the uninsured portion of the DSH limit calculation:

- Hillcrest Medical Center
- Great Plains Medical Center
- OU Medicine

We selected one hospital for additional review of Medicaid primary account details for MSP rate year 2022. The following hospital was identified as having material exceptions that impact the uncompensated care costs:

- Norman Regional Hospital

OB REQUIREMENT

The following hospital did not certify to meeting the obstetrics requirements and, as such, could be considered to be unqualified for the DSH payment:

- Drumright Community Hospital LLC

This letter is intended solely for the information and use of management and others within the OHCA and is not intended to be and should not be used by anyone other than these specified parties.

Sincerely,

Myers and Stauffer LC
Austin, Texas