



Federal Price Transparency 2024-25 Past Milestones, Present Landscape, Future Direction

Tuesday 24, 2024

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A close-up, artistic photograph of a film reel and its mechanical components. The film is white and partially unspooled, showing its characteristic sprocket holes. The metal parts are dark and polished, with some gold-colored accents. The lighting is dramatic, highlighting the textures and curves of the machinery.

Agenda

- **Hospital Price Transparency**
- **Payer Price Transparency**
- **Price Estimator Tools**
- **Machine Readable Files Standard Schemas**
- **Automated Audits, Warnings, Civil Monetary Penalties, “Overall Compliance”**
- **Misinformation**



Hospital Price Transparency

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Hospital Federal Price Transparency Requirements Timeline

ACA mandates price transparency for hospital standard charges.

2010

CMS finalizes the Hospital Price Transparency Rule, effective January 2021.

2018

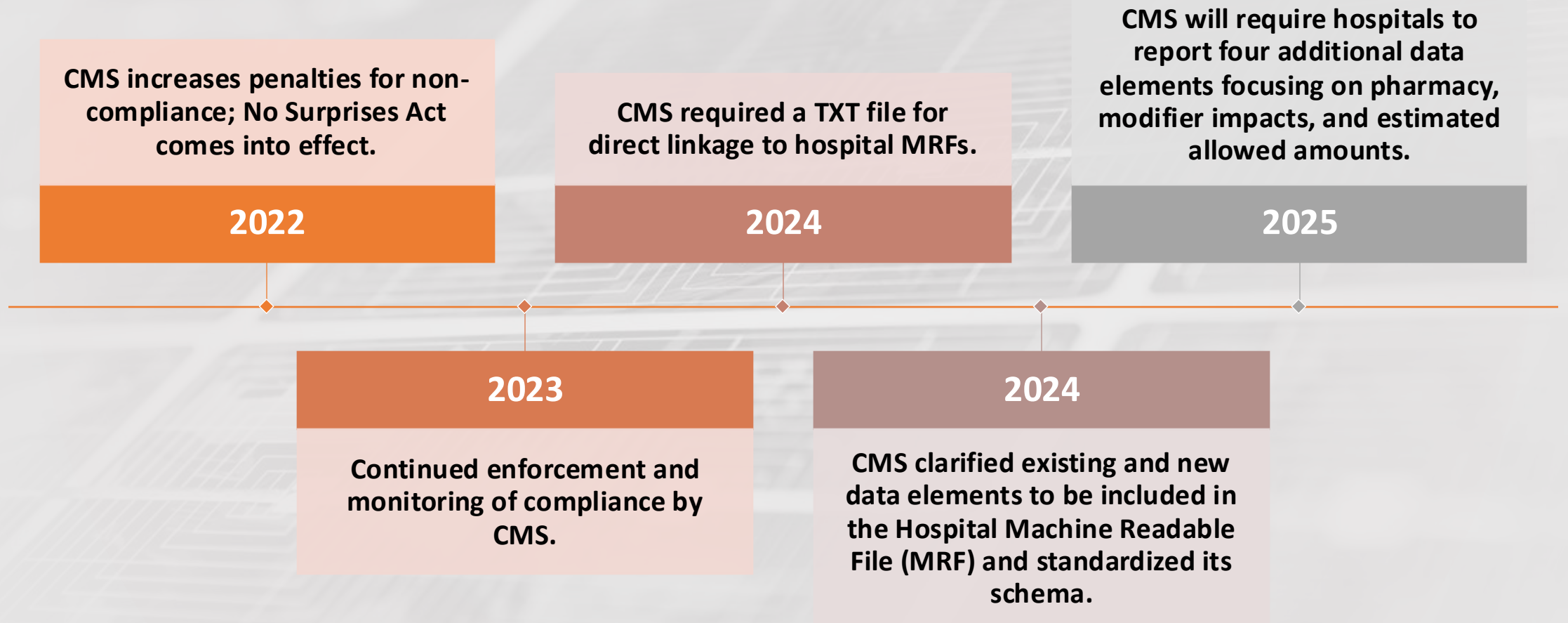
2019

2021

CMS updates guidelines for hospitals to post chargemasters online.

Hospitals required to post machine-readable files and shoppable service lists.

Hospital Federal Price Transparency Requirements Timeline





Payer Price Transparency

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Payer Price Transparency Requirements Timeline

2019: Proposal of the Transparency in Coverage Rule.

2020: Finalization of the Transparency in Coverage Rule.

July 2022: Machine-readable files with pricing data must be publicly available.

January 2023: Cost estimator tool required for 500 shoppable services.

January 2024: Cost estimator tool expands to cover all services.

2022 and Ongoing: The NSA mandates additional transparency, focusing on out-of-network protections and consumer cost estimates.



Price Estimator Tools

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Provider and Payer Price Estimator Tools



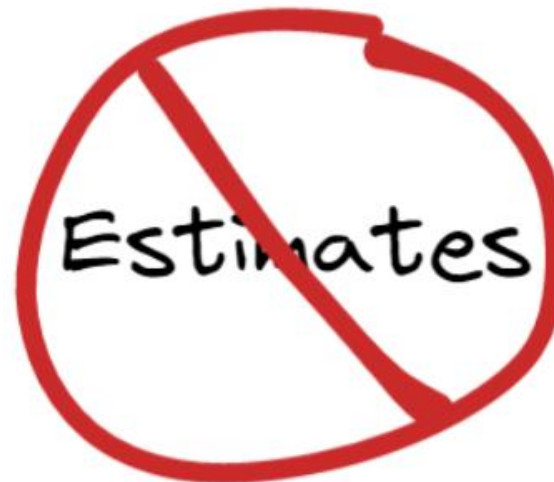
Effective Jan. 1, 2021:
Hospital requirement and
alternative means
requirement



Effective Jan. 1, 2023: Payer
requirement to provide an
online price estimator tool
that allows consumers to see
estimates of their out-of-
pocket costs for 500 specific
shoppable services.



Effective Jan. 1, 2024: Payer
requirement that the price
estimator tool must be
expanded to cover all
healthcare services.





Machine Readable Files (MRFs)

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Data Element Requirements for January 1, 2025



Requirement	Regulation cite*	Compliance Date
Estimated Allowed Amount	45 CFR § 180.50 (b)(2)(ii)(C)	January 1, 2025

Drug Unit of Measurement	45 CFR § 180.50 (b)(2)(iii)(C)	January 1, 2025
Drug Type of Measurement	45 CFR § 180.50 (b)(2)(iii)(C)	January 1, 2025

Modifiers	45 CFR § 180.50 (b)(2)(iv)(C)	January 1, 2025
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Estimated Allowed Amount

The average dollar amount that the hospital has historically received from a third-party payer for an item or service. The estimated allowed amount is therefore not prospective and is also not based on the hospital's chargemaster or claims submitted to the payer which, as we understand it, contains only gross charges for itemized items and services and agree that using information from the 835 transaction, the ERA that provides claim payment information, including any adjustments made to the claim, such as denials, reductions, or increases in payment, would appear to meet this requirement as the data in the 835 form is used by hospitals to track and analyze their claims and reimbursement patterns.



**Automated Audits, Warnings,
Civil Monetary Penalties,
“Overall Compliance”**

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Federal Price Transparency CMS Compliance Public Use File

***45 CFR §180.90(e)(2)(i)**

Date Action Taken	Hospital Name	Effective Date
2022-06-07 (PDF)	Northside Hospital Atlanta	2021-09-02
2022-06-07 (PDF)	Northside Hospital Cherokee	2021-09-09
2023-04-19 (PDF)	Frisbie Memorial Hospital	2022-10-24
2023-04-19 (PDF)	Kell West Regional Hospital	2022-07-08
2023-07-20 (PDF)	Falls Community Hospital & Clinic	2023-01-06
2023-07-20 (PDF)	Fulton County Hospital Under Review *	2022-12-22
2023-07-24 (PDF)	Community First Medical Center	2022-06-22
2023-08-22 (PDF)	Hospital General Castaner Under Review *	2022-09-19
2023-08-22 (PDF)	Samaritan Hospital - Albany Memorial Campus Under Review *	2023-06-06
2023-08-22 (PDF)	Doctors' Center Hospital Bayamón	2023-06-14
2023-08-23 (PDF)	Betsy Johnson Hospital	2023-06-06
2023-08-23 (PDF)	UF Health North	2023-02-27
2023-09-05 (PDF)	Holy Cross Hospital Under Review *	2023-06-21
2023-09-27 (PDF)	West Covina Medical Center	2023-03-15
2024-07-03 (PDF)	Jackson Memorial Hospital	2024-02-07

Federal Price Transparency Adoption Sept 23, 2024

Live MRF Tracker

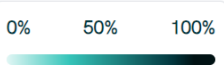
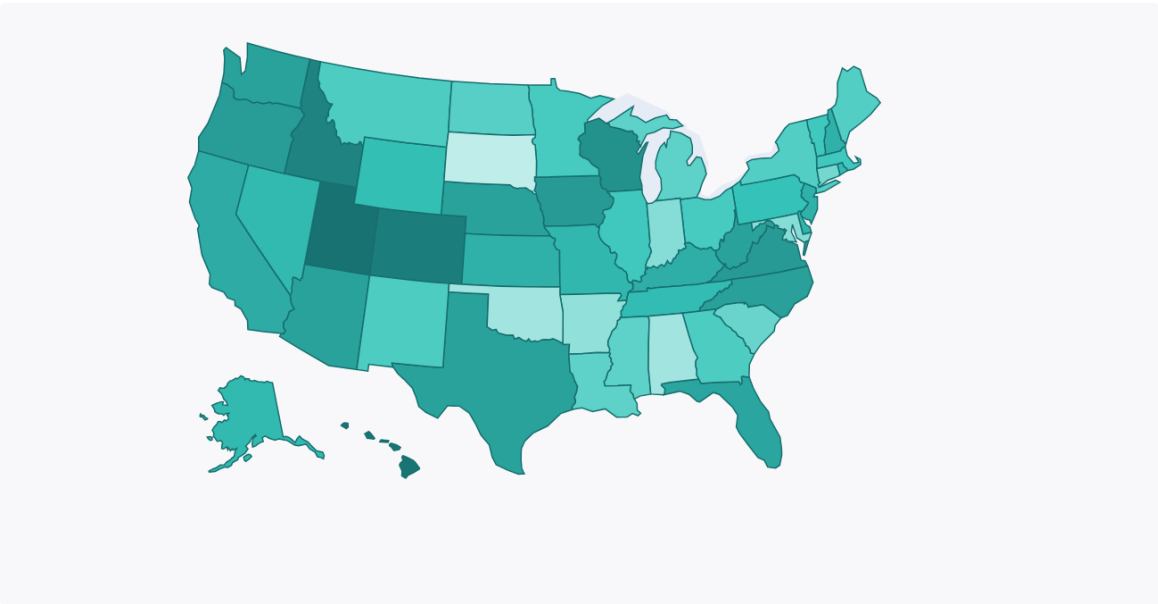
All States ▾

6,111 Total Hospitals

Technical Requirement Adoption

Last Refreshed 9/23/2024
99.9% Checked for V2.0 Adoption

- 42.8%**
Meet Both Requirements
- 94.2%**
Have Posted MRFs
- 61.9%**
Text File Adoption
- 55.3%**
V2.0 Schema Adoption



Community Education Addressing Misinformation Stakeholder Feedback

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Questions?



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