



HFMA/NEHIA

Price Transparency: Tackling 2024 & Beyond

Wednesday, December 4 - Friday, December 6, 2024
Mystic Marriott Hotel, Groton, CT



UMass Memorial Health

PRICE TRANSPARENCY: TACKLING 2024 & BEYOND

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Hospital Billing, Revenue Integrity**

UMASS MEMORIAL HEALTH

Community Healthlink | Harrington | HealthAlliance-Clinton Hospital | Marlborough Hospital
UMass Memorial Medical Center | UMass Memorial Medical Group | UMass Memorial Accountable Care Organization

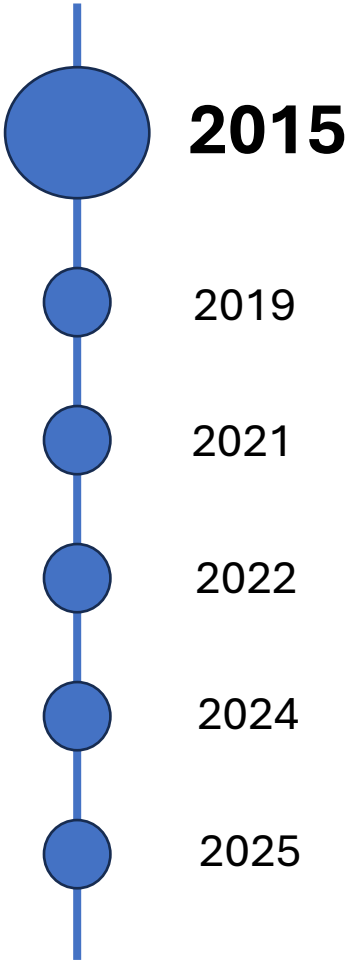
PRICE TRANSPARENCY: TACKLING 2024 & BEYOND

AGENDA

- **Brief History of Price Transparency**
 - **Recent Regulatory Changes**
- **Determining Path Forward: Build vs Buy**
 - **UMass Memorial Health**
 - Process and Validation
 - Lessons learned
 - Where Are We Now
 - Preparing For 2025
- **Future Considerations & Usage**

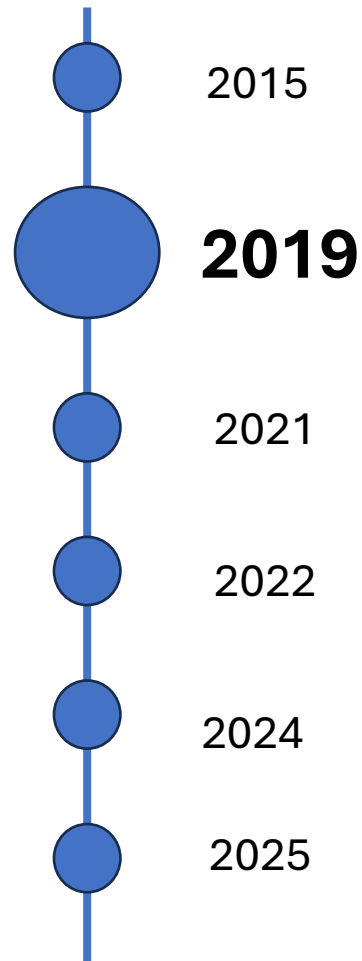
HISTORY OF PRICE TRANSPARENCY

BUILDS ON PREVIOUS ATTEMPTS AT MANDATING PRICE TRANSPARENCY



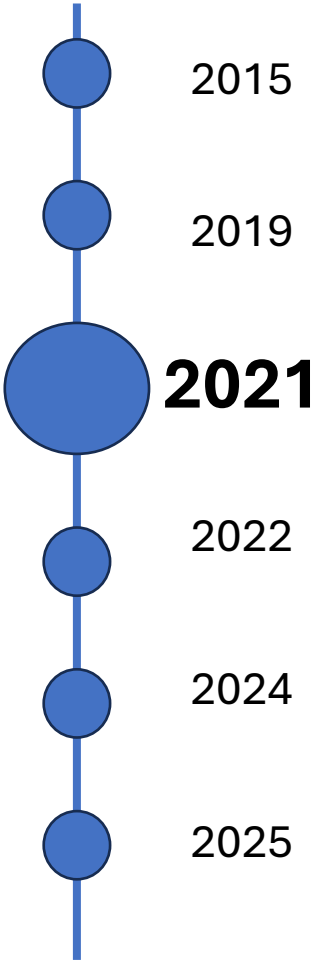
2015 IPPS Final Rule – access to standard charges

BUILDS ON PREVIOUS ATTEMPTS AT MANDATING PRICE TRANSPARENCY



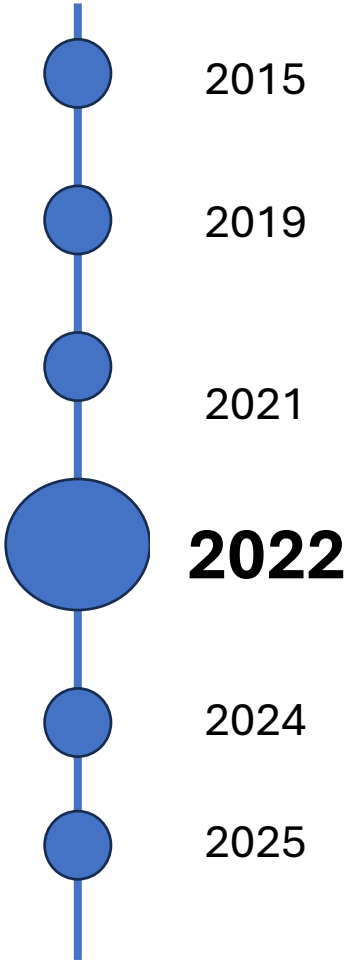
- IPPS Final Rule – publication of standard charges updated annually
- Executive Order to improve price transparency
- Stark and OPSS proposed rules included price transparency provisions
- Proposed rule on transparency in coverage
- **Nov 15, 2019 – CMS publishes 2020 OPSS Final Rule - CMS-1717-F2**
 - Implements Section 2718(e) of the Public Health Service Act
 - Requires hospitals make public a yearly list of the hospital’s standard charges for items and services provided by the hospital, including for diagnosis-related groups established under section 1886(d)(4) of the Social Security Act
 - *Defines “Standard Charges” to include gross charges, discounted cash prices, payer-specific negotiated charges, and de-identified minimum and maximum negotiated charges*
 - Prescribed detailed requirements for content and format of disclosed information
- **December 4, 2019 – AHA files lawsuit against HHS**
 - June 23, 2020 – court rules in favor of HHS

BUILDS ON PREVIOUS ATTEMPTS AT MANDATING PRICE TRANSPARENCY



- Rule effective 01/01/2021

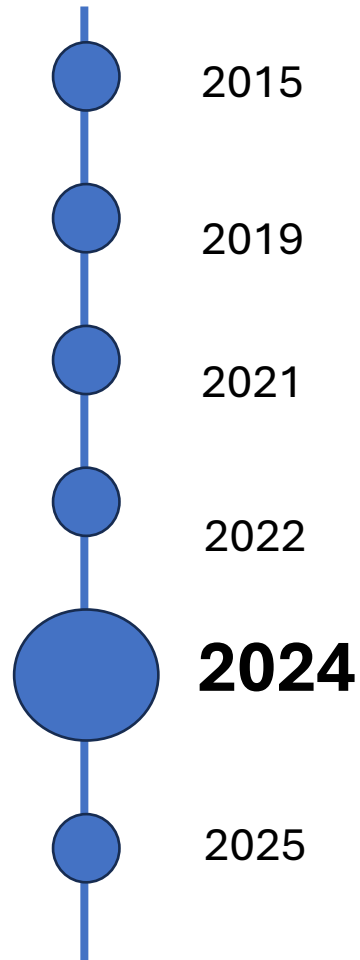
BUILDS ON PREVIOUS ATTEMPTS AT MANDATING PRICE TRANSPARENCY



Turquoise Health reviewed nearly *5,000* hospitals that had posted machine-readable files - Rated on a scale of 1 to 5, with 5 being the most transparent based on seven different subcategories.

UMMH was one of ONLY 104 hospitals that got a rating of 5!

2024-MAJOR UPDATES TO CMS REQUIREMENTS



From:

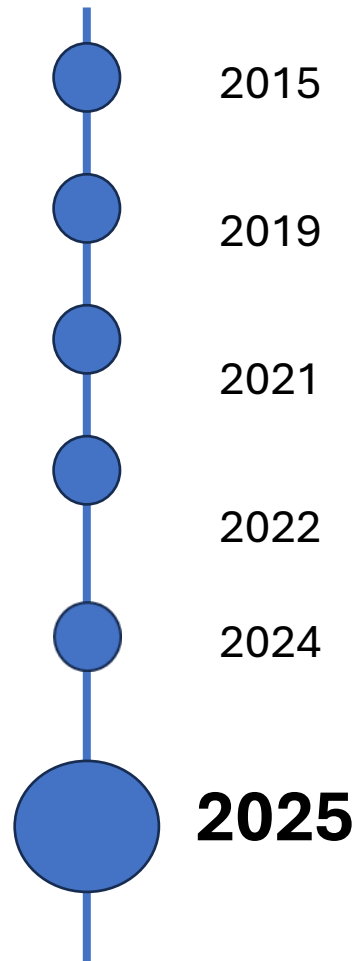
For each hospital site, *for each item or service* (code) provided by the hospital

1. Gross charge
2. Payer and plan-specific negotiated charge
3. De-identified minimum negotiated charge
4. De-identified maximum negotiated charge
5. Discounted cash price
6. Publicly available posted to the hospital's website in machine-readable format, updated at least annually

To: In addition to above,

- New File Header
- Updates to previous Data Elements
- New data elements
- TXT file: Placed in root of public domain of the hospital with CMS specified fields and format
- Specific format and publishing guidelines

2024/25-MAJOR UPDATES TO CMS REQUIREMENTS



From (2021):

For each hospital site, **for each item or service** (code) provided by the hospital

1. Gross charge
2. Payer and plan-specific negotiated charge
3. De-identified minimum negotiated charge
4. De-identified maximum negotiated charge
5. Discounted cash price
6. Publicly available posted to the hospital's website in machine-readable format, updated at least annually

To (2024): In addition to above,

- New File Header
- Updates to previous Data Elements
- New data elements
- TXT file: Placed in root of public domain of the hospital with CMS specified fields and format
- Specific format and publishing guidelines

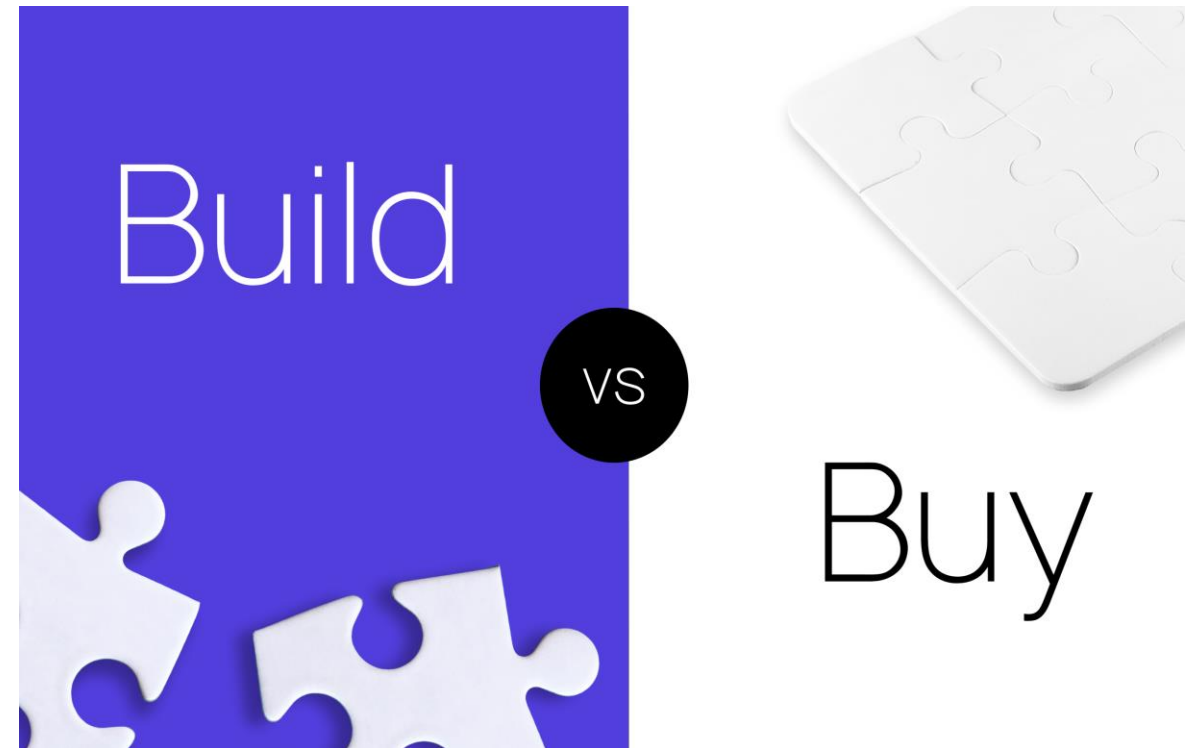
And now...2025:

- Modifiers
- Rx unit and type of measurements

DETERMINING PATH FORWARD

BUILD VS BUY

- Resource Capacity
- Team's Knowledge and Capabilities
- Access to Necessary Data
- Understanding of CMS Regulations
- Cost (time and money)



UMASS MEMORIAL HEALTH OUR JOURNEY

OUR METHODOLOGY

COLLABORATE

Collaboration and regular check-ins with necessary teams

RESEARCH

Utilized webinars and CMS tools/sites

OPTIMIZE

Continue to work on our internal process and ensure knowledge transfer

PRICE TRANSPARENCY: TACKLING 2024 & BEYOND

INTERNAL PROCESS IMPROVEMENTS

The screenshot shows the 'Select a Universe' interface in Epic's Web Intelligence Tool. On the left, a folder tree shows 'Universes (45)' expanded to 'UMass Universes (45)'. The main pane displays a table with columns for 'Name', 'Revision', and 'Price Transparency Universe'. A specific universe, 'PriceTransparency.unx', is highlighted, with a path of 'Universes/UMass Universes/Hospital Billing Accounts' and a revision number of 11. A red speech bubble is overlaid on the table, containing the text: 'Price Transparency Universe - Allows ad-hoc querying/QA of large data sets'.

Created a Price Transparency Universe in Epic's Web Intelligence Tool

The screenshot shows the 'Query Panel' in Epic's Web Intelligence Tool. The 'Add Query' button is visible at the top left. Below it, a dropdown menu shows 'Query 1'. The main area is divided into three sections: 'PriceTransparency' (a search bar with 'Type here to filter the tree'), 'Result Objects' (a list of objects including 'Billing Class', 'Location Internal', 'Description', 'Code 1', 'Code 1 Type', 'Modifiers', 'Setting', and 'Drug Unit Of Measurement', with 'Standard Charge Gross' selected), and 'Query Filters' (a filter for 'Standard Charge Gross' set to 'Greater than' with a value of '10000').

CMS RESOURCES

- <https://github.com/CMSgov/hospital-price-transparency>



Schemas

The following is the technical documentation for the allowable formats:

- [CSV](#)
- [JSON](#)

CMS Template Required Data Elements and Enforcement Timeline

MRF Information

| Requirement | Regulation cite | Compliance Date |
|-----------------------|--|-----------------|
| MRF Date | 45 CFR § 180.50 (b)(2)(i)(B) | July 1, 2024 |
| CMS Template Version | 45 CFR § 180.50 (b)(2)(i)(B) | July 1, 2024 |
| Affirmation Statement | 45 CFR § 180.50 (a)(3)(ii) | July 1, 2024 |

CMS VALIDATION TOOLS

- <https://cmsgov.github.io/hpt-tool/>



- Utilize CMS tools available

- Errors vs Warnings

- More than just the MRF file

Please note: Leveraging the Validator helps ensure adherence to CMS form and manner requirements (45 CFR 180.50(c)(2)), but it does not certify that your MRF fully complies with all HPT requirements at 45 CFR 180.50.



```
location-name: UMass Memorial Medical Center, Inc.  
source-page-url: https://www.ummhealth.org/umass-memorial-medical-center/patients-visitors/patient-resources/price-transparency  
mrf-url: https://ummh-price-transparency.s3.us-east-2.amazonaws.com/043358564_umass-memorial-medical-center-inc._standardcharges.zip  
contact-name: Daniel Sullivan  
contact-email: Daniel.Sullivan@umassmemorial.org
```

LESSONS LEARNED

CHALLENGES/LESSONS LEARNED

File Size

New CMS requirements have deemed the file size challenging to work with, publish, and use

Epic Build/File Run Time

- File run for each entity had to be broken down by contract
 - Each entity on average took 2-3 weeks of run time

Optimization

- Reduce individual plans based on contracts

CHALLENGES/LESSONS LEARNED

Collaboration

Disconnect between marketing/web publishing

Website
Upgrades

Website upgrades could negatively impact file access

Optimization

Collaboration with marketing and inclusion in process

CHALLENGES/LESSONS LEARNED

System
Expansion

Ensure compliance of “old” MRF files

Review

Need to review all new entities and ensure compliance

Optimization

Regular inclusion of any new entity, including validation of MRF

WHERE ARE WE NOW

CMS REQUIRED PUBLISHED CONTENT

1

Standard Charge files – *Easily accessible, no charge, no password, searchable*

1. [UMass Memorial Medical Center](#)
2. [HealthAlliance-Clinton Hospital](#)
3. [Harrington HealthCare System](#)
4. [HealthAlliance-Marlborough](#)

2

.TXT Files – Root folder of public site

1. [UMMH](#)

3

Link in footer – Home page of each entity

The screenshot shows the footer of the website at <https://www.ummhealth.org>. The footer is divided into four columns: PATIENTS & VISITORS, PROFESSIONALS, RESOURCES, and OUR SYSTEM OF CARE. The 'Price Transparency' link under 'PATIENTS & VISITORS' is highlighted with a red box.

| PATIENTS & VISITORS | PROFESSIONALS | RESOURCES | OUR SYSTEM OF CARE |
|--|---|-------------------------------------|---|
| Plan Your Visit | For Physicians | Video Library | UMass Memorial Health |
| Directions & Parking | Transfer and Access Center | Contact Information | UMass Memorial Health – Community Healthlink |
| Financial Counseling | Research & Teaching | Terms of Use | UMass Memorial Health – Harrington |
| Medical Records | Careers | SMS Terms of Use | UMass Memorial Health – HealthAlliance-Clinton Hospital |
| Language Access Services | Employee Self Reporting Tool | | UMass Memorial Health – |
| Price Transparency | UMass Memorial Health - The Pursuit | | |

MRF FILE

| hospital_name | last_updated_on | version | hospital_location | hospital_address | license_number | To the best of its | |
|--|-----------------|-------------|-------------------------|------------------------|----------------|--------------------|------------|
| UMass Memorial Health - Harrington Hospital | 6/18/2024 | 2.0.0 | UMass Memorial Health - | 100 South St Southbrid | V111 | TRUE | |
| description | code 1 | code 1 type | code 2 | code 2 type | code 3 | code 3 type | setting |
| HC Rem/Rplc Perm Pcmkr Gen/Sng Ld | PX-76100530 | CDM | 33227 | CPT | 761 | RC | outpatient |
| SCREW FIXATION 6.5MMX45MM CHARLOTTE CAROLINA JONES | SUP-192304 | CDM | C1713 | HCPCS | 278 | RC | outpatient |
| ECONAZOLE 1 % TOPICAL CREAM | RX-9915 | CDM | J3490 | HCPCS | 250 | RC | outpatient |
| STENT VASCULAR BALLOON EXPANDABLE COVERED 7MMX58M | SUP-190910 | CDM | C1874 | HCPCS | 278 | RC | outpatient |
| HC Cortisol Panel 1 | PX-30100076 | CDM | 80400 | CPT | 301 | RC | outpatient |

- Required columns present, validated using CMS validation tool
- Required affirmation statement in each MRF File
- Contracted rates for each item or service

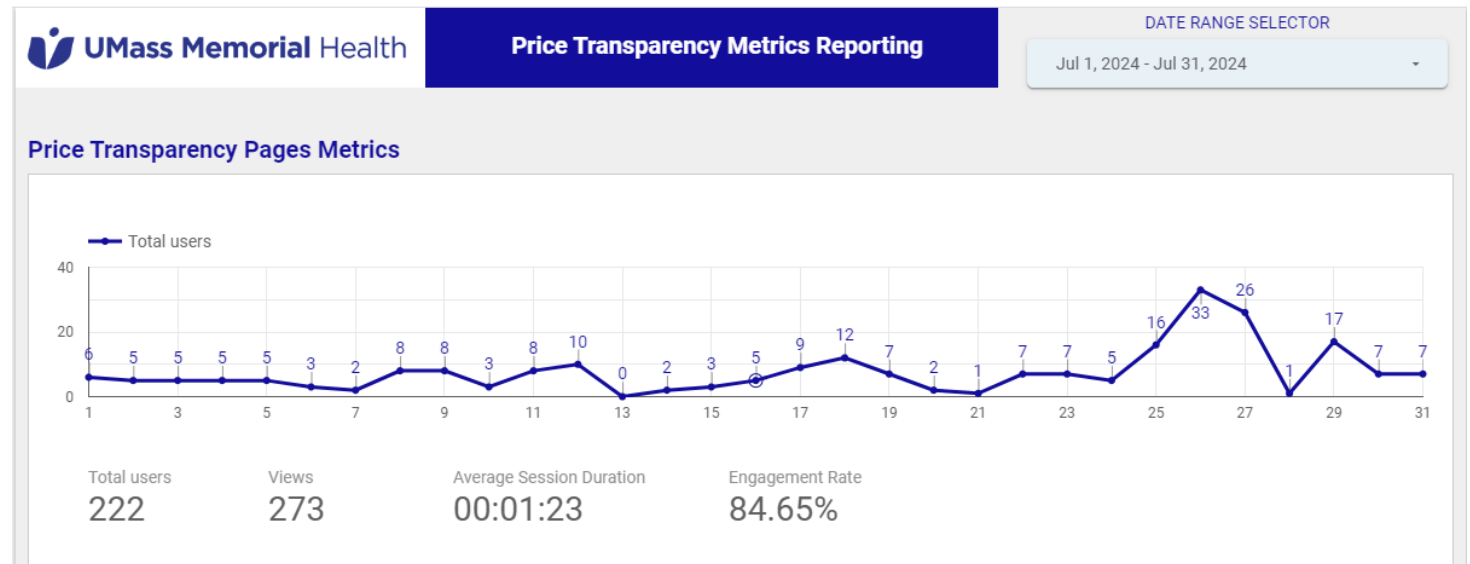
TRACKING & MONITORING

- Epic Dashboards

MyChart Metrics

| | May | Jun | Jul | Aug | Sep | Oct | MTD |
|---|------------|------------|------------|------------|------------|------------|-----------|
| Estimates Created by Patients With MyChart Login | 9 | 19 | 23 | 17 | 10 | 24 | 1 |
| Estimates Created by Patients Without MyChart Login | 178 | 83 | 137 | 115 | 165 | 158 | 16 |
| Total Shopper Estimates Created | 187 | 102 | 160 | 132 | 175 | 182 | 17 |

- Custom Built Reporting tools



CMS ENFORCEMENT

- Increasing MRF reviews
 - Utilize automation
 - Over 200 reviews per month
- Steps of enforcement
 - Warning notice with 90 days to correct
 - If remains out of compliance
 - Corrective Action Plan with proposed completion date
 - Civil Monetary Penalties



Enforcement Actions

Below is a list of civil monetary penalty (CMP) notices issued by CMS.

PREPARING FOR 2025

PREPARING FOR 2025

Preparing for January 1, 2025

| Requirement | Regulation cite | Compliance Date |
|---------------------------------------|--|-----------------|
| Standard Charges | | |
| Estimated Allowed Amount | 45 CFR § 180.50 (b)(2)(ii)(C) | January 1, 2025 |
| Item & Service Information | | |
| 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 |
| Coding Information | | |
| Modifiers | 45 CFR § 180.50 (b)(2)(iv)(C) | January 1, 2025 |

PREPARING FOR 2025

- Estimated Allowed Amount
 - Applies to items and services that the standard charge is based on a percentage or algorithm
 - MRF must calculate and encode an estimated allowed amount in dollars
- Drug Unit & Type of Measurement
 - Specific unit used for drug measurement (milliliters)
 - Type of measurement that is used (injection)
- Modifiers
 - Any modifier that changes the standard charge of an item or service
 - Description of the modifier and the impact on the standard charge



FUTURE CONSIDERATIONS & USAGE

FUTURE CONSIDERATIONS & USAGE

- How can we use this data?
- Current Pricing review and recommendations - Strategic Pricing
- Market Analysis/Impact
- Price Comparisons
- Contract Negotiations
- Health Equity for Patients
- Cost Control
- Access to Information
 - Burden Remains with the Patient
- Outside vendors and CMS Enforcement



TACKLING PRICE TRANSPARENCY

TEAM WORK!

QUESTIONS

hfma™
ma-ri chapter

