

June 7, 2022

Administrator Chiquita Brooks-LaSure Centers for Medicare and Medicaid Services 7500 Security Boulevard Baltimore, MD 21244

Re: Calendar Year 2023 Outpatient Prospective Payment System (OPPS) Rule

Dear Administrator Brooks-LaSure:

We are writing to offer an essential set of suggestions to address the failure of a majority of US hospitals to comply with the Hospital Price Transparency Rule. To the best of our knowledge, the Centers for Medicare and Medicaid Services (CMS) has not yet issued penalties for noncompliance, and we encourage you and CMS to prioritize enforcement of the HPT Rule. We suggest that CMS apply its existing model for hospital reporting and attestation to the standard charges files required under the Rule. This efficient approach will increase compliance, reduce the enforcement burden on CMS, and increase availability of data to patients – ultimately enabling a functional, competitive marketplace in healthcare.

To achieve that goal, we recommend CMS take the following essential actions in its next round of OPPS rulemaking:

- 1. Establish uniform data file standards, as proposed in Appendix A.
- 2. **Require hospitals to submit their price files directly to CMS** in standardized format on an annual basis. Maintain a central repository of the files and provide easy electronic access to the public.
- 3. **Require hospitals to attest to the completeness and accuracy** of the data and to its compliance with the HPT requirements.
- 4. **Coordinate policy with the Center for Consumer Information and Insurance Oversight (CCIIO)** to harmonize the machine-readable file requirements under the Transparency in Coverage rule.

As CMS has acknowledged, many hospitals have <u>flouted the Hospital Price Transparency Rule</u>, including the requirement to publish standard charges. Too many hospitals take inconsistent approaches to providing the pricing data, and in many cases, the files are unreadable, incomplete or inaccurate. In addition, some hospitals have posted the data on their website with a pop-up "disclaimer" that requires user acknowledgement. This violates the regulatory requirement that standard charge data be "easily accessible, without barriers, including . . . to automated searches and direct file downloads through a link posted on a publicly available website."¹ Other hospital failures include posting only one of the seven required data elements or using generic chargemaster prices instead of the required negotiated charges separated by payer and plan. (See Appendix B for samples of both exemplary compliance and poor noncompliance.)

These failures demonstrate the need for an efficient mechanism of monitoring and enforcement. We suggest that the next OPPS rule update require hospitals to *affirmatively submit their price files to CMS and certify that*

¹ 45 C.F.R. § 50(d)(3)(iv). This specific content was added to the transparency requirements with the following explanation from CMS: "We believe that this additional requirement will serve to ensure greater accessibility to the machine-readable file and its contents and would prohibit practices we have encountered in our compliance reviews, such as lack of a link for downloading a single machine-readable file, using 'blocking codes' or CAPTCHA, and requiring the user to agree to terms and conditions or submit other information prior to access." <u>86 Fed. Reg. 42018</u>, 42319 (Aug. 4, 2021).

they are complete and accurate. First, requiring *submission* of hospitals' price files (rather than mere publication on their websites), and then making them available through CMS -- will facilitate CMS enforcement efforts by making it obvious which hospitals have failed to publish the required file in its entirety. This approach will also enable public access to pricing information in a reliable, accessible manner that provides patients with accurate, timely, and useful data for healthcare decisions.

This method of data submission is consistent with other CMS programs and can easily follow prior models. Hospitals are already required to submit quality data to CMS under the Hospital Inpatient Quality Reporting (IQR) Program, which was developed nearly 20 years ago. CMS has stated that the IQR Program is intended to equip consumers with quality-of-care information to make more informed decisions, and CMS offers this information to the public on its Care Compare website. It makes sense to do the same for HPT price data files.

Second, requiring an *attestation* from an appropriate hospital executive that the hospital's price data file is complete and accurate will strongly incentivize hospital compliance. CMS routinely requires reporting entities to make attestations regarding compliance. For example, when a hospital participates in the Promoting Interoperability Program, CMS requires the submitting hospital to make a number of attestations regarding compliance through its electronic portal (42 C.F.R. § 495.40). Given hospitals' ongoing HPT compliance failures, we suggest that CMS require hospitals to attest that the standard charge data they submit is accurate and complete.

Finally, we encourage CMS to coordinate its policymaking under the Hospital Price Transparency Rule with the requirements it establishes for the Transparency in Coverage rule. CMS is uniquely positioned at the hub of transparency regulation as the agency responsible for implementing both hospital price transparency as well as health plan and issuer disclosures under the Transparency in Coverage rule.² We suggest that CMS coordinate with CCIIO to ensure that both the hospitals' and payers' machine-readable files are consistent and are consistently available to users.

Thank you for considering our suggestions for the next round of OPPS rule changes. Once all hospitals comply and upload their pricing data to the CMS website in a standard format and attest to its completeness, American consumers will be empowered with access to systemwide upfront prices, so they can compare, shop, and lower their costs of healthcare and coverage.

Warmest Regards,

Athia J. Lisher

Cynthia A. Fisher Founder and Chairman PatientRightsAdvocate.org

P.S. We're happy to report that the State of Colorado passed a bill last month that <u>bans debt collection against</u> <u>patients</u> by any hospital that is not compliant with the federal Hospital Price Transparency Rule. It passed with massive bipartisan support: unanimous in the state Senate and 63-1 in the state House. We encourage CMS to consider self-enforcing policies of this type at the national level -- for example, conditioning certain Medicare payments or other program activities on compliance with the Rule.

PatientRightsAdvocate.org CY 2023 OPPS Letter DRAFT v4

² <u>85 Fed. Reg. 72158</u> (Nov. 12, 2020) (codified in pertinent part at 45 C.F.R. Part 147).

Recommended Pricing Data Standards

- 1. Require that the machine-readable pricing files be disclosed in ONE (1) Standard File Format, e.g. JSON, in addition to a human-readable price file disclosed in ONE (1) Standard File Format, e.g. CSV.
- 2. Require disclosure of the full payer and plan name and provide hospitals with a uniform, nationally applicable set of abbreviations for the most common payers and plans.
- 3. Mandate that plan specific rates be disclosed in the machine-readable file and updated in real time.
- 4. Define a standard schema for machine-readable file disclosures, including all names and data types.
- 5. Require that all pricing data also be provided for free via application programming interfaces (APIs).
- 6. Provide a safe harbor or require that the use of CPT or DRG codes be made available without royalty, copyright, or other fees for the purpose of price transparency including by any downstream software.
- 7. Require that explicit billing codes, such as CPTs or DRGs, be identified for each procedure, and require separate files or tabs for each billing code type, including CPT, DRG, HCPCS and NDC.
- 8. Require that the pricing file can be found with just a single click from the hospital's homepage.
- 9. Require all hospitals to post a machine-readable file with actual prices (discounted cash prices and insurance-negotiated rates) for the 300 shoppable services, whether or not they have a price estimator tool.
- 10. Implement a standard for representing where there is no data for a particular field, or provide a legend to help users understand the meaning of a dash or "N/A," or another symbol or acronym that we have observed on these pricing files.
- 11. Require all descriptions, codes, and standard charge information to be separated by rows, and items and services to be separated by columns.
- 12. Require all hospitals to post a list of insurers, payers, and specific plans accepted, so patients will know in advance whether the hospital is in-network.

APPENDIX B: Hospital Compliance Examples

Billing Code	Procedure Description	Gross Charge	Discounted Cash Price	Minimum Payer Reimbursement	Maximum Payer Reimbursement	Aetna W	Aetna nonW PPO	Alliance	Anthem PPO	Anthem Blue Priority	Anthem HMO POS	Beloit Health System Employee Plan	Cigna OAP PPO EPO	Dean Health Plan HMO POS
ICPCS C1751	CATH CV DBL LUMEN 6FR 60CM	\$ 356.04	\$ 238.55	\$ 138.86	\$ 327.56	\$ 256.35	\$ 288.39	\$ 222.53	\$ 238.55	\$ 138.86	\$ 153.10	\$ 231.43	\$ 245.67	\$ 245.0
ICPCS C1768	PATCH PERICARDIAL 5 X 10CM	\$ 871.00	\$ 583.57	\$ 339,69	\$ 801.32	\$ 627.12	\$ 705.51	\$ 544.38	\$ 583.57	\$ 339.69	\$ 374.53	\$ \$66.15	\$ 600.99	\$ 600.
4CPCS C1763	PATCH PERICARDIAL 9MM X 14MM	\$ 1,236.15	\$ 828.22	\$ 482.10	\$ 1,137.26	\$ 890.03	\$ 1,001.28	\$ 772.59	\$ 828.22	\$ 482.10	\$ \$31.54	\$ 803.50	\$ 852.94	\$ 852.5
	CATHETER SWAN-GANZ CONTROLCATH TD 7FR X 110CM LATEX-FREE		\$ 1,234.48	\$ 718.58	\$ 1,695.10	\$ 1,326.60	\$ 1,492.43	\$ 1,151.56	\$ 1,234.48	\$ 718.58	\$ 792.28	\$ 1,197.63	\$ 1,271.33	\$ 1,271.
	CATHETER 9FR 43CM SELECTSITE DEFLECTABLE	\$ 1,340.00	\$ 897.80		\$ 1,232.80	\$ 964.80	\$ 1,085.40	\$ 837.50	\$ 897.80	\$ 522.60	\$ 576.20	\$ 871.00	\$ 924.60	\$ 924.
	CATHETER C304L6906 SELECTSITE	\$ 2,680.00	\$ 1,795.60	\$ 1,045.20	\$ 2,465.60	\$ 1,929.60	\$ 2,170.80	\$ 1,675.00	\$ 1,795.60	\$ 1,045.20	\$ 1,152.40	\$ 1,742.00	\$ 1,849.20	\$ 1,849.
	CATHETER C304L5906 SELECTSITE	\$ 2,680.00	\$ 1,795.60	\$ 1,045.20	\$ 2,465.60	\$ 1,929.60	\$ 2,170.80	\$ 1,675.00	\$ 1,795.60	\$ 1,045.20	\$ 1,152.40	\$ 1,742.00	\$ 1,849.20	\$ 1,849.
	CATHETER C304XL7405 SELECTSITE	\$ 2,680.00	\$ 1,795.60	\$ 1,045.20	\$ 2,465.60	\$ 1,929.60	\$ 2,170.80	\$ 1,675.00	\$ 1,795.60	\$ 1,045.20	\$ 1,152.40	\$ 1,742.00	\$ 1,849.20	\$ 1,849.3
	CATHETER C315H2002 RIGHTSITE H2	\$ 1,474.00	\$ 987.58	\$ 574.86	\$ 1,356.08	\$ 1,061.28	\$ 1,193.94	\$ 921.25	\$ 987.58	\$ 574.86	\$ 633.82	\$ 958.10	\$ 1,017.06	\$ 1,017.0
	CATHETER C315H4002 RIGHTSITE H4	\$ 1,474.00	\$ 987.58	5 574.86	\$ 1,356.08	5 1,061.28	\$ 1,193.94	\$ 921.25	\$ 987.58	\$ 574.86	5 633.82	\$ 958.10	\$ 1,017.06	\$ 1,017.0
	CATHETER C315HIS02 RIGHTSITE HIS	\$ 1,474.00	\$ 987.58	\$ 574.86	\$ 1,356.08	\$ 1,061.28	\$ 1,193.94	\$ 921.25	\$ 987.58	\$ 574.86	\$ 633.82	\$ 958.10	\$ 1,017.06	\$ 1,017.0
	CATHETER C315J02 RIGHTSITE J	\$ 1,474.00	\$ 987.58	\$ 574.86	\$ 1,356.08	\$ 1,061.28	\$ 1,193.94	\$ 921.25	\$ 987.58	\$ 574.86	\$ 633.82	\$ 958.10	\$ 1,017.06	\$ 1,017.0
	CATHETER C31551002 RIGHTSITE 510	\$ 1,474.00	\$ 987.58	\$ 574.86	\$ 1,356.08	\$ 1,061.28	\$ 1,193.94	\$ 921.25	\$ 987.58	\$ 574.86	\$ 633.82	\$ 958.10	\$ 1,017.06	\$ 1,017.0
	CATHETER C3155402 RIGHTSITE 54	\$ 1,474.00	\$ 987.58	\$ 574.86	\$ 1,356.08	\$ 1,061.28	\$ 1,193.94	\$ 921.25	\$ 987.58	\$ 574.86	\$ 633.82	\$ 958.10	\$ 1,017.06	\$ 1,017.0
	CATHETER C315S502 RIGHTSITE 55	\$ 1,474.00	\$ 987.58	\$ \$74.86	\$ 1,356.08	\$ 1,061.28	\$ 1,193.94	\$ 921.25	\$ 987.58	\$ 574.86	\$ 633.82	\$ 958.10	\$ 1,017.06	\$ 1,017.0
	GRAFT PTFE RINGD 4-6X40CM TPRD	\$ 2,018.71	\$ 1,352.54	\$ 787.30	\$ 1,857.21	\$ 1,453.47	\$ 1,635.16	\$ 1,261.69	\$ 1,352.54	\$ 787.30	\$ 868.05	\$ 1,312.16	\$ 1,392.91	\$ 1,392.9
	GRAFT PTFE TAPRO 4-7MM 40CM CF	\$ 2,177.50	\$ 1,458.93	\$ 849.23	\$ 2,003.30	\$ 1,567.80	\$ 1,763.78	\$ 1,360.94	\$ 1,458.93	\$ 849.23	\$ 936.33	\$ 1,415.38	\$ 1,502.48	\$ 1,502.4
	LEAD CORTICAL STRIP 15CM	\$ 7,500.00	\$ 5,025.00	\$ 2,925.00	\$ 6,900.00	\$ 5,400.00	\$ 6,075.00	\$ 4,687.50	\$ 5,025.00	\$ 2,925.00	\$ 3,225.00	\$ 4,875.00	\$ 5,175.00	\$ 5,175.0
	LEAD CORTICAL STRIP 25CM	\$ 7,500.00	\$ 5,025.00	\$ 2,925.00	\$ 6,900.00	\$ 5,400.00	\$ 6,075.00	\$ 4,687.50	\$ 5,025.00	\$ 2,925.00	\$ 3,225.00	\$ 4,875.00	\$ 5,175.00	\$ 5,175.0
ICPCS C1778	LEAD CORTICAL STRIP 35CM	\$ 7,500.00	\$ 5,025.00	\$ 2,925.00	\$ 6,900.00	\$ 5,400.00	\$ 6,075.00	\$ 4,687.50	\$ 5,025.00	\$ 2,925.00	\$ 3,225.00	\$ 4,875.00	\$ 5,175.00	\$ 5,175.0
	HARMONIC SHEARS SHORT #CS14C	\$ 1,199.17	\$ 803.44	\$ 467.68	\$ 1,103.24	\$ 863.40	\$ 971.33	\$ 749.48	\$ 803.44	\$ 467.68	\$ 515.64	\$ 779.46	\$ 827.43	\$ 827.4
	NERVE STIMULATOR VERCISE PC IPG KIT DB-1140-5	\$ 25,500.00	\$ 17,085.00	\$ 9,945.00	\$ 23,460.00		\$ 20,655.00	\$ 15,937.50	\$ 17,085.00	\$ 9,945.00	\$ 10,965.00	\$ 16,575.00	\$ 17,595.00	\$ 17,595.0
	LEAD BOCM VERCISE TUNGSTEN STYLET DB-2201-B0-DC	\$ 7,500.00	\$ 5,025.00	\$ 2,925.00	\$ 6,900.00	\$ 5,400.00	\$ 6,075.00	\$ 4,687.50	\$ 5,025.00	\$ 2,925.00	\$ 3,225.00	\$ 4,875.00	\$ 5,175.00	\$ 5,175.0
	LEAD 45CM VERCISE TUNGSTEN STYLET DB-2201-45-DC	\$ 7,500.00	\$ 5,025.00	\$ 2,925.00	\$ 6,900.00	\$ 5,400.00	\$ 6,075.00	\$ 4,687.50	\$ 5,025.00	\$ 2,925.00	\$ 3,225.00	\$ 4,875.00	\$ 5,175.00	\$ 5,175.0
	LEAD 30CM VERCISE CARTESIA DB-2202-30	\$ 7,500.00	\$ 5,025.00	\$ 2,925.00	\$ 6,900.00	\$ 5,400.00	\$ 6,075.00	\$ 4,687.50	\$ 5,025.00	\$ 2,925.00	\$ 3,225.00	\$ 4,875.00	\$ 5,175.00	\$ 5,175.0
	LEAD 45CM VERCISE CARTESIA DB-2202-45	\$ 7,500.00	\$ 5,025.00	\$ 2,925.00	\$ 6,900.00	\$ 5,400.00	\$ 6,075.00	\$ 4,687.50	\$ 5,025.00	\$ 2,925.00	\$ 3,225.00	\$ 4,875.00	\$ 5,175.00	\$ 5,175.0
	ADAPTER 15CM VERCISE M8 DB-9218-15	\$ 3,350.00	\$ 2,244.50	\$ 1,306.50	\$ 3,082.00	\$ 2,412.00	\$ 2,713.50	\$ 2,093.75	\$ 2,244.50	\$ 1,306.50	\$ 1,440.50	\$ 2,177.50	\$ 2,311.50	\$ 2,311.5
	ADAPTER 55CM VERCISE M8 DB-9218-55	\$ 3,350.00	\$ 2,244.50	\$ 1,306.50	\$ 3,082.00	\$ 2,412.00	\$ 2,713.50	\$ 2,093.75	\$ 2,244.50	\$ 1,306.50	\$ 1,440.50	\$ 2,177.50	\$ 2,311.50	\$ 2,311.5
	MESH FLAT SHEET 3" X 6" (7.5CM X 15CM)	\$ 87.70	\$ 58.76	\$ 34.20	\$ 80.68	\$ 63.14	\$ 71.04	\$ 54.81	\$ 58.76	\$ 34.20	\$ 37.71	\$ 57.01	\$ 60.51	\$ 60.5
	MESH PERFIX PLUG LGE 1.6" X 1.90" (4.1CM X 4.8CM)	\$ 2,592.90	\$ 1,737.24	\$ 1,011.23	\$ 2,385.47	\$ 1,866.89	\$ 2,100.25	\$ 1,620.56	\$ 1,737.24	\$ 1,011.23	\$ 1,114.95	\$ 1,685.39	\$ 1,789.10	\$ 1,789.1
4CPC5 C1768	GRAFT BYPASS 6 X 80 DISTAFLO	\$ 6,177.40	\$ 4,138.86	\$ 2,409.19	\$ 5,683.21	\$ 4,447.73	\$ 5,003.69	\$ 3,860.88	\$ 4,138.86	\$ 2,409.19	\$ 2,656.28	\$ 4,015.31	\$ 4,262.41	\$ 4,262.4
	BLADE HARMONIC SMM SHRT #DH105	\$ 240.00	\$ 160.80	\$ 93.60	5 220.80	\$ 172.80	\$ 194.40	\$ 150.00	\$ 160.80	\$ 93.60	\$ 103.20	\$ 156.00	\$ 165.60	\$ 165.6
	STEREOTAXIC PINS DSP SCRW LONG	\$ 527.79	\$ 353.62	\$ 205.84	\$ 485.57	\$ 380.01	\$ 427.51	\$ 329.87	\$ 353.62	\$ 205.84	\$ 226.95	\$ 343.06	\$ 364.18	\$ 364.1
	LEAD DEPTH 30CM 10MM SPACING	\$ 7,500.00	\$ 5,025.00	\$ 2,925.00	\$ 6,900.00	\$ 5,400.00	\$ 6,075.00	\$ 4,687.50	\$ 5,025.00	\$ 2,925.00	\$ 3,225.00	\$ 4,875.00	\$ 5,175.00	\$ 5,175.0
	LEAD DEPTH 30CM 3.5MM SPACING	\$ 7,500.00	\$ 5,025.00	\$ 2,925.00	\$ 6,900.00	\$ 5,400.00	\$ 6,075.00	\$ 4,687.50	\$ 5,025.00	\$ 2,925.00	\$ 3,225.00	\$ 4,875.00	\$ 5,175.00	\$ 5,175.0
	LEAD DEPTH 44CM 10MM SPACING	\$ 7,500.00	\$ 5,025.00	\$ 2,925.00	\$ 6,900.00	\$ 5,400.00	\$ 6,075.00	\$ 4,687.50	\$ 5,025.00	\$ 2,925.00	\$ 3,225.00	\$ 4,875.00	\$ 5,175.00	\$ \$,175.0
	LEAD DEPTH 44CM 3.5MM SPACING	\$ 7,500.00	\$ 5,025.00	\$ 2,925.00	\$ 6,900.00	\$ 5,400.00	\$ 6,075.00	\$ 4,687.50	\$ 5,025.00	\$ 2,925.00	\$ 3,225.00	\$ 4,875.00	\$ 5,175.00	\$ 5,175.0
	CATHETER BFR URETHRAL W/ELECTRODE	\$ 971.50	5 650.91	\$ 378.89	5 893.78	\$ 699.48	\$ 786.92	\$ 607.19	\$ 650.91	\$ 378.89	\$ 417.75	\$ 631.48	\$ 670.34	\$ 670.3
	CATHETER 10FR URETHRAL W/ELECTRODE	\$ 971.50	\$ 650.91	\$ 378.89	5 893.78	\$ 699.48	\$ 786.92	\$ 607.19	\$ 650.91	\$ 378.89	\$ 417.75	\$ 631.48	\$ 670.34	\$ 670.3
	CATHETER 12FR URETHRAL W/ELECTRODE	\$ 971.50	\$ 650.91	5 378.89	5 893.78	\$ 699.48	\$ 786.92	\$ 607.19	\$ 650.91	\$ 378.89	\$ 417.75	\$ 631.48	\$ 670.34	\$ 670.3
	CATHETER 14FR URETHRAL W/ELECTRODE	\$ 971.50	\$ 650.91	5 378.89	\$ 893.78	\$ 699.48	\$ 786.92	\$ 607.19	\$ 650.91	\$ 378.89	5 417.75	\$ 631.48	\$ 670.34	\$ 670.3
	PATCH .BCM X BCM VASCULAR XENOSURE	\$ 690.10	\$ 462.37	\$ 269.14	\$ 634.89	\$ 496.87	\$ 558.98	\$ 431.31	\$ 462.37	\$ 269.14	\$ 296.74	\$ 448.57	\$ 476.17	
	GRAFT 6MM X 40CM ACUSEAL	\$ 4,284.65	\$ 2,870.72	\$ 1,671.01	\$ 3,941.88	\$ 3,084.95	\$ 3,470.57	\$ 2,677.91	\$ 2,870.72	\$ 1,671.01	\$ 1,842.40	\$ 2,785.02	\$ 2,956.41	\$ 2,956.4
	GRAFT 4-7MM X 45CM TAPERED ACUSEAL	\$ 4,917.80	\$ 3,294.93	\$ 1,917.94	\$ 4,524.38	\$ 3,540.82	\$ 3,983.42	\$ 3,073.63	\$ 3,294.93	\$ 1,917.94	\$ 2,114.65	\$ 3,196.57	\$ 3,393.28	\$ 3,393.2
4CPC5 C1814	SILICONE OIL 10CC OPHTHALMIC	\$ 1,336.65	\$ 895.56			\$ 962.39	\$ 1,082.69	\$ 835.41	\$ 895.56	\$ \$21.29	\$ \$74.76	\$ 868.82	\$ 922.29	\$ 922.2
	BLADE HARMONIC SMM LONG #HDH05	\$ \$25.01	\$ 351.76	\$ 204.75	\$ 483.01	\$ 378.01	\$ 425.26	\$ 328.13	\$ 351.76	\$ 204.75	\$ 225.75	\$ 341.26	\$ 362.26	\$ 362.2
	ADAPTER FEEDING DUAL PORT ENTAKE	\$ 14.14	\$ 9.47	\$ 5.51	5 13.01	\$ 10.18	\$ 11.45	5 8.84	\$ 9.47	\$ 5.51	\$ 6.08	\$ 9.19	\$ 9.76	\$ 9.7
	HARDWIRE BASKET 22Q OLYMPUS	\$ 1,486.33	\$ 995.84	\$ 579.67		\$ 1,070.16	\$ 1,203.93	\$ 928.96	\$ 995.84	\$ 579.67	\$ 639.12	\$ 966.11	\$ 1,025.57	\$ 1,025.5
	AGILE PATENCY CAPSULE	\$ 72.00	\$ 48.24	\$ 28.08	5 66.24	\$ 51.84	\$ 58.32	\$ 45.00	\$ 48.24	\$ 28.08	\$ 30.96	\$ 46.80	\$ 49.68	\$ 49.6
	PILLCAM S8 2 FOR CAPSULE ENDOSCOPY	\$ 1,561.10	\$ 1,045.94	\$ 608.83		\$ 1,123.99	\$ 1,264.49	\$ 975.69	\$ 1,045.94	\$ 608.83	\$ 671.27		\$ 1,077.16	\$ 1,077.1
	CAPSUI F BRAVO PH S/PK	\$ 971.50	\$ 650.91	\$ \$78.89	5 893.7R	\$ 699.4R	< 786.92	\$ 607.19	19.023 2	\$ 378.89	\$ 417.75	\$ 631.48	\$ 670.34	\$ 670.3

COMPLIANT: The University of Wisconsin Health University Hospital – Madison, WI:

COMPLIANT: Bayhealth Hospital, Kent Campus – Dover, DE

				Commer	CIRC																	Medicare Advant		101			
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RG-NDC /	NPC CPT	Description	Price	HMO		Open Access	POS	PPO	OAP	POt	S PS	PO EF	O Fed	eral	HMO	POS	DE Exchan	pe Choice Plus	EPO	HMO	PPO Oxfor		HMO	MA PPO	MA Preferred	MA Distinct	MA Signatur
32000017		00 ORBITS COMPLETE		492	344.4	344.4	344.				116.72	416.72	458.43	458.43				5.35 452				452.64	108.97	108.97			
32000018		10 SINUS 2 VIEW		295	206.5	206.5	206.				249.87	249.87	340.34	340.34				0.93 27				271.4	80.9	80.5			
32000019		20 SINUS COMPLETE		353	247.1	247.1	247.	1 24			298.99	298.99	340.34	340.54		340		0.93 324.				324.76	80.9	80.5			
32000020	5522 702	50 SKULL LIMITED		353	247.1	247.1	247.	1 24	7.1 28	8.99 2	298.99	298.99	458.43	458.43	3 458.43			5.35 324		6 324.76	324.76	324.76	108.97	108.97			
32000021	5522 702			591	413.7	413.7	413.		1.7 50	0.58 5	500.58	500.58	458.43	458.43				5.35 543.		2 543.72	543.72	543.72	108.97	108.93		108.9	
32000022	5521 703	30 TEMPOROMANDIBULAR JOIN	N	353	247.1	247.1	247.	1 24	7.1 29	8.99 2	298.99	206.99	340.34	340.34	4 340.34	340	.34 30	0.93 324.	76 324.7	6 324.70	324.76	324.76	80.9	80.1	82.92	80.1	0
32000023	5521 703	50 CEPHALOGRAM ORTHODON	4	371	259.7	259.7	259.	7 29	9.7 31	4.24 1	314.24	314.24	340.34	340.34	4 340.34	340	.34 30	0.93 341.	32 341.3	2 341.33	2 341.32	341.32	80.9	80.9	82.93	80.5	9
32000024	5521 703	55 ORTHOPANTOMOGRAM		353	247.1	247.1	247.	1 24	7.1 29	8.99 3	298.99	298.99	340.34	340.34	4 340.34	340	.34 30	0.93 324.	76 324.7	6 324.76	324.76	324.76	80.9	80.9	82.92	80.1	9
32000025	5521 703	50 NECK SOFT TISSUE		323	226.1	226.1	226.	1 22	5.1 27	3.58 2	273.58	273.58	340.34	340.34	4 340.34	340	.34 30	0.93 297.	16 297.1	6 297.16	5 297.16	297.16	80.9	80.5	82.92	80.1	9
32000026	5523 703	90 SIALOGRAM		1,289.00	902.3	902.3	902	3 90	2.3 1,09	1.78 1,0	091.78	1,091.78	968.13	968.12	3 968.13	968	.13 85	6.04 1,185.	88 1,185.8	8 1,185.86	1,185.88	1,185.88	230.13	230.13	3 235.88	230.11	3 2
32000027	5521 711	00 RIBS WO/PA CHEST		353	247.1	247.1	247.	1 24	7.1 20	8.99 1	09.805	298.99	340.34	340.34	4 340.34	340	.34 30	0.93 324.	76 324.7	6 324.70	324.76	324.76	80.9	80.5	82.93	80.1	9
32000028	5522 711	01 RIBS W/PA CHEST		402	281.4	281.4	281.	4 28	1.4 34	0.49 2	340.49	340.49	458.43	458.43	3 458.43	458	43 40	5.35 369.	84 369.8	4 369.84	369.84	369.84	108.97	108.97	7 111.65	108.97	7 1
32000029	5521 711	20 X-RAY EXAM BREASTBONE 2	2	490	343	343	34	3 3	43 41	5.03 4	15.03	415.03	340.34	340.34	4 340.34	340	.34 30	0.93 450	1.8 450.	8 450.8	450.8	450.8	80.9	80.5	82.90	80.1	9
32000030	5521 711	30 STERNOCLAVICULAR JOINTS	15	431	301.7	301.7	301.	7 30	1.7 36	5.06 2	365.06	365.06	340.34	340.34	4 340.34	340	.34 30	0.93 396.	52 396.5	2 396.53	396.52	396.52	80.9	80.5	82.92	80.1	9
32000031	5522 720	82 X-RAY EXAM ENTIRE SPINE 3	2	627	368.9	368.9	368.	9 36	1.9 44	6.37 4	146.37	446.37	458.43	458.43	3 458.43	458	43 40	5.35 484.	84 484.8	484.84	484.84	484.84	108.97	108.97	7 111.65	108.93	7 1
32000032	5521 720	20 SPINE SINGLE VIEW ANY LEY	N V	492	344.4	344.4	344.	4 34	1.4 41	6.72 4	\$16.72	416.72	340.34	340.34	4 340.34	340	.34 30	0.93 452	64 452.6	4 452.64	452.64	452.64	80.9	80.5	82.92	80.5	9
32000033	5521 720	40 SPINE CERVICAL 2-3 VIEW		492	344.4	344.4	344.	4 34	1.4 41	6.72 4	16.72	416.72	340.34	340.34	4 340.34	340	.34 30	0.93 452	64 452.6	4 452.64	452.64	452.64	80.9	80.5	82.92	80.0	9
32000034	5522 720	50 SPINE CERVICAL 4-5 VIEW		824	576.8	576.8	576.	8 57	1.8 69	7.93 6	597.93	697.93	458.43	458.43	3 458.43	458	43 40	5.35 758.	08 758.0	8 758.06	758.08	758.08	108.97	108.97	7 111.66	108.9	7 1
32000035	5522 720	52 SPINE CERVICAL 6-7 VIEW		824	576.8	576.8	576.	8 57	1.8 69	7.93 6	597.93	697.93	458.43	458.43	3 458.43	458	43 40	5.35 758.	08 758.0	8 758.06	758.08	758.08	108.97	108.97	7 111.05	108.9	7 1
32000036	5521 720	11 X-RAY EXAM ENTIRE SPINE 1	1	317	221.9	221.9	221	9 22	1.9 2	68.5	268.5	268.5	340.34	340.34	4 340.34	340	34 30	0.93 291	64 291.6	4 291.64	291.64	291.64	80.9	80.5	82.92	80.1	9
32000037	5522 720	70 SPINE THORACIC TWO VIEW	v	492	344.4	344.4	344	4 34	1.4 41	6.72 4	16.72	416.72	458.43	458.43	3 458.43	458	43 40	5.35 452	64 452.6	4 452.64	452.64	452.64	108.97	108.97	7 111.65	108.9	7 1
32000038	5522 720	72 SPINE THORA AP/LAT/SWIM		492	344.4	344.4	344	4 34	41 41	6.72 4	16.72	416.72	458.43	458.43	3 458.43	458	43 40	5.35 452	64 452.6	4 452.64	452.64	452.64	108.97	108.97	7 111.66	108.9	7 .
32000039		80 SPINE T-LUMBAR 2 VIEWS		439	307.3	307.3	307	3 30	1.3 37	1.83 2	371.83	371.83	340.34	340.34	4 340.34	340	34 30	0.93 403	403.8	8 403.84	403.88	403.88	80.9	80.5	82.92	80.5	
32000041	5522 721	00 SPINE LUMBAR 2-3 VIEWS		353	247.1	247.1	247	1 24	1.1 29	8.99 2	00.80	295.99	458.43	458.43	3 458.43	458	43 40	5.35 324	76 324.7	6 324.76	324.76	324.76	108.97	108.97	7 111.65	108.9	7 1
32000042	5522 721	10 SPINE LUMBAR 4-5 VIEWS		591	413.7	413.7	413	7 41	17 50	0.58 5	500.58	500.58	458.43	458.43	3 458.43	458	43 40	5.35 543	72 543.7	2 543.72	543.72	543.72	108.97	108.97	7 111.00	108.9	7 1
32000043		14 SPINE LUMBAR 6 OR MORE		591	413.7	413.7	413		17 50		500.58	500.58	458.43	458.43				5.35 543				543.72	108.97	108.97			
32000044		70 PELVIS 1 OR 2 VIEW		353	247.1	247.1	247	1 24	7.1 29	8.99 2	00.80	298.99	458.43	458.42				5.35 324				324.76	108.97	108.97			
32000045		90 PELVIS 3 VIEWS		353	247.1	247.1	247	1 24	7.1 29	1.99 5	298.99	298.99	458.43	458.43				5.35 324		6 324.7		324.76	108.97	108.97	7 111.66		
32000046		02 SACROILIAC JOINTS		570	399	309	39		00 48		482.79	482.79	458.43	458.43				5.35 52				524.4	108.97	108.97			
32000047		20 SPINE BACRUM/COCCYX		353	247.1	247.1	247	1 24	1 20		00.80	298.99	340.34	340.34		340		0.93 324				324.76	80.9	80.5			
32000048		40 MYELOGRM CERVICAL W/RA	AI		457.40	1,457,40	1457.4	1.457	40 1.76	1.45 1.1	763.45	1,763.45	3,008.69	3.008.65		3.008						1.015.44	715.18	715.18			
32000049		55 MYELOGRM THORACIC W/R/			457.40	1,457,40	1457.4	1.457			763.45	1,763.45	3.008.69	3.008.65		3.008						1,915.44	715.18	715.14			
32000050		5 MYELOGRAM LUMBAR W/RA			457.40	1,457,40					763.45	1,763.45	3,008.69	3,008.65		3,008					1.915.44	1,915.44	715.18	715.16			
32000051		70 MYELOGRM COMPLETE W/R			457.40						163.45	1.763.45	3,008.69	3,008.60		3.008		0.33 1,915.			1.915.44	1,915.44	715.18	715.1			
32000052		00 CLAVICLE COMPLETE	·	492	344.4	344.4	344				16.72	416.72	340.34	340.34		340		0.93 452				452.64	80.9	80.0			
32000053		10 SCAPULA COMPLETE		353	247.1	247.1	247.	1 24			298.99	298.99	458.43	458.43		458		5.35 324				324.76	108.97	108.93			
32000054		20 SHOULDER SINGLE VIEW		254	177.8	177.8	177				215.14	215.14	340.34	340.34				0.93 233				233.68	80.9	80.5			
32000055		30 SHOULDER 2 VIEWS		353	247.1	247.1	247	1 24			298.99	298.99	340.34	340.34		340		0.93 324				324.76	80.9	80.5			
32000056		40 ARTHROGRAM SHOULDER		1.182.00	827.4	827.4	827				001.15	1.001.15	1.548.64	1.548.64		1.548						1.087.44	368.12	308.12			
32000057		50 ACROMIOCLAVICULAR JTS		353	247.1	247.1	247.	1 24			298.90	298.99	340.34	340.34		340		0.93 324				324.76	80.9	80.5			
32000058		60 HUMERUS 2 VIEWS		353	247.1	247.1	247	24			298.99	208.99	340.34	340.34		340		0.93 324				324.76	80.9	80.5			
32000058		70 ELBOW AP/LATERAL			247.1	247.1	247.	1 24			298.99	298.99	340.34	340.34		340		0.93 324. 0.93 324.				324.76	80.9	80.1			
32000059		70 ELBOW AP/LATERAL 80 ELBOW COMPLETE 3 VIEWS		353	247.1	247.1	247.	1 24			298.99	298.99	340.34	340.34		340		0.93 324. 0.93 324.				324.76	80.9	80.5			
32000060		50 ELBOW COMPLETE 3 VIEWS 85 ARTHROGRAM ELBOW		1.182.00	827.4	827.4	247.				298.99		1.548.64	1.548.64				9.33 1.087				324.76	368.12	368.12			
												1,001.15															
32000062		90 FOREARM 2 VIEWS		353	247.1	247.1	247.	1 24			99.99	298.99	340.34	340.34		340		0.93 324				324.76	80.9	80.5			
32000063		92 INFANT UPPER EXT 2 VIEWS	5	402	281.4	281.4	281.				\$40.49	340.49	458.43	458.43				5.35 369.				369.84	108.97	108.97			
32000064		00 WRIST AP/LATERAL		288	201.6	201.6	201.				243.94	243.94	340.34	340.34		340		0.93 264.				264.96	80.9	80.5			
32000065		10 WRIST COMPLETE 3 VIEWS 15 ARTHROGRAM WRIST		353	247.1	247.1	247.				298.99	298.99	340.34	340.34		1.548		0.93 324. 8.33 1.177.				324.76	80.9	368.12			

NONCOMPLIANT: The Medical Center of Aurora – Aurora, CO:

Aetna	1	
Service Description	Coding	Rate
Bum	MS-DRG 003, 004, 927-929, 933-935	70% of BC
Cardiac Studies	CPT/HCPC 93000-93352, 0541T, 0542T	54% of BC
Cardiology	MS-DRG 251, 274	\$38,953,20
Cardiology	MS-DRG 031-033, 215-236, 242-250, 258-262, 265-273, 319, 320	\$8,862,88
Detox		\$1,155.44
ECT	CPT/HCPC 90870	\$326.51
ER	CPT/HCPC 99281, G0380, 99283, G0382, 99284, G0383, 99285, 99291,99292, G0384, 99282, G0381	\$3,528.09
General Surgery		\$26,125.84
Grouper 1		\$3,581.31
Grouper 2		\$4,562.90
Grouper 3		\$5,704.00
Grouper 4		\$6,519.00
Grouper 5		\$8,590.00
Grouper 6		\$9,648.00
Grouper 7		\$10,616.00
Grouper 8		\$13,656.00
Grouper 9		\$15,835.00
ICU/CCU		\$8,771.36
Intermediate ICU/CCU		\$5,184.40
Lab/Path/Transfusions	CPT/HCPC D0416, D0431, D0475, D0476, D0477, D0478, D0479, D0481, D0482, D0483, 0001M, 0002M, 0003M, 0004M, 0006	
Medicine		\$3,882.32
Neonate		\$1,045.20
Neurosurgery	MS-DRG 028-030, 453-460, 471-473, 518-520	\$11,853.92
NICU - II		\$4,711.20
NICU - III		\$4,711.20
NICU - IV		\$4,711.20
Observation		\$7,772.38
Obstetrics	MS-DRG 783-788	\$5,755.36
Obstetrics	MS-DRG 768, 796-798, 805-807	\$4,774.64
Occupational Therapy		\$154.50
Oncology	CPT/HCPC 51720, 96401-96542, Q0083, Q0084, Q0085	54% of BC
OP Other	CPT/HCPC 95782, 95783, 95800, 95801, 95805-95808, 95810, 95811, G0398, G0399, G0400	54% of BC
OP Other	CPT/HCPC A4231, A4802, A6250, A9180, A9513, A9517, A9563, A9564, A9590, A9600, B4100-B4102, C9041, C9046-C9047,	
OP Other	CPT/HCPC 90935, 90937, 90945, 90947, 90993, 90999, 90935, 90937, 90993, 90999	54% of BC
Other Outpatient	CPT/HCPC 10000-69999	\$9,807.66
	CF1/hCFC1000-03939	54% of BC
Other Outpatient		
Partial Hospitalization		\$599.46
Physical Therapy		\$154.50
Psych - Adolescent (Ages 0-18)		\$1,386.32
Psych - Adult (Ages 19-999)		\$1,155.44
Psych IOP - Adolescent (Ages 0-18)		\$392.43
Psych IOP - Adult (Age 19-999)		\$326.51
Radiology		54% of BC
Rehab		\$2,503.28
Rev Code 122 w / surgery		\$11,020.88
Speech Therapy		\$154.50
Surgical		\$11,020.88
Trauma		70% of BC
Vascular Diagnostic Studies	CPT/HCPC 93880-93998	54% of BC
Aetna Cofinity		
Service Description	Coding	Rate
Ambulatory Surgery		65% of BC
Ambulatory Surgery - Ceiling		\$12,000.00
Bum	MS-DRG 003, 004, 927-929, 933-935	70% of BC
Built	no one vou, vou, veu veu, vdu dud	10700100

NONCOMPLIANT: BridgePoint Hospital of Washington - National Harbor, Washington, DC:

Rem/Service/Service 🖤 Package Description	Inpatient Default Gross 🦷 Charge	Default Gross Charge*	Price**	De-Identified Minimum Negotiated Payer Specific Charge	De-identified Maximum Negotiated Payer Specific Charge	E Code	Aetoa	Caritas	Carefirst Community Health Plan DC - THP	Cigna	Kaiser Mid Atlantic	 Kaiser Medicare Advantage*** 	Tricare Humana East Region***	 UMR - United Healthcare 	United Healthcare
Clindamycin - NaCl	\$ 46.98			8 N/A	N/A		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Methyl Salicylate/Menthol		N/A		0 N/A	N/A		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Gentamicin In Nacl, Iso-Osm	\$ 10.65	N/A	\$ 10.6	5 N/A	N/A	250	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Zalepion	\$ 8.00	N/A	\$ 8.0	0 N/A	N/A	254	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Aranesp	\$ 696.60	N/A	\$ 696.6	0 N/A	N/A	250	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Aranesp	\$ 489.90	N/A	\$ 489.9	0 N/A	N/A	250	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Aranesp	\$ 1,671.84	N/A	\$ 1,671.8	A N/A	N/A	250	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Aranesp	\$ 1,224.75	N/A	\$ 1,224.7	5 N/A	N/A	250	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Lactobacillus Acidophilus/Pect	\$ 8.00	N/A	\$ 8.0	0 N/A	N/A	251	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Furosemide - UD	\$ 8.00	N/A	\$ 80	0 N/A	N/A	250	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
guaiFENesin 100 mg/5 ml		N/A		0 N/A	N/A	N/A			ing to						
UD							N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Vancomycin 1.5 GM IVPB	5 86.82	N/A	5 86.8	2 N/A	N/A	250	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Yupelri - UD	\$ 123.60			O N/A	N/A		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
fentaNYL	\$ 19.20	N/A	\$ 19.7	0 N/A	N/A	250	N/A	N/A	N/A	N/A	N/A.	N/A	N/A	N/A	N/A
Ampicillin Sodium/Sulbactam Na	\$ 16.05			5 N/A	N/A	254		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Ampicillin	5 8.01	N/A	5 8.0	1 N/A	N/A	254		inter a	N/H	ing is	inform	infini	inform	inform .	144
Sodium/Sulbactam Na		- April					N/A	N/A	N/A	N/A	N/A.	N/A	N/A	N/A	N/A
Norepinephrine DRIP NS	\$ 52.32	N/A	6 52.3	2 N/A	N/A	250	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
L. Acidophilus/Pectin,		N/A		0 N/A	N/A	251								1.000	
Citrus							N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Daliresp - UD	\$ 34.95			5 N/A	N/A		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Milrinone Lactate/D5w	\$ 45.84			4 N/A	N/A		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Dobutamine HCL In Dextrose 5 %	\$ 17.25	N/A	\$ 17.2	5 N/A	N/A	250	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Vitamin C	\$ 8.00	N/A	\$ 80	O N/A	N/A	251	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Sodium Polystyrene		N/A		0 N/A	N/A	254		infres.	N/H	1411	(dist	idea .	information and information an	- Alexandre	inter
Sulfonate (N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Gabapentin 250mg/5ml	5 8.00	N/A	\$ 80	0 N/A	N/A	250	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Colistin (Colistimethate Na)				0 N/A	N/A		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Gentamicin In Nacl.	\$ 12.84			4 N/A	N/A	250									
Iso-Osm							N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Odefsey	\$ 337.47	N/A	\$ 337.4	7 N/A	N/A	250	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
JAK2 Gene Mutation-Quant	\$ 864.32	N/A	\$ 864.3	2 N/A	N/A		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Dextrose 10 % In Water	\$ 8.00	N/A		0 N/A	N/A		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Enoxaparin Sodium	\$ 85.86			6 N/A	N/A		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Urea Nitrogen Urine Quant Time	\$ 120.00	N/A	\$ 120.0	0 N/A	N/A	84580	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Urea Nitrogen Urine Quantitati	\$ 120.00	N/A	\$ 120.0	N/A 0	N/A	84520	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Specific Gravity Body Fluid	\$ 120.00	N/A	\$ 120.0	0 N/A	N/A	84315	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Cholestrol Body Fluid	5 120.00			0 N/A	N/A	84311	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
LDH Body Fluid	\$ 120.00			0 N/A	N/A	83615	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Body Fluid Cell Count W/	\$ 120.00			0 N/A	N/A	89051	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Body Fluid Cell W/ Cytology	\$ 120.00	11/2	e	0 N/A	N/A	88108	N/A N/A	N/A N/A	N/A N/A	N/A N/A	N/A	N/A N/A	N/A N/A	N/A	N/A N/A
Amylase Body Fluid Amylase Body Fluid	\$ 120.00 \$ 120.00			U N/A U N/A	N/A N/A	82150	N/A N/A	N/A N/A	N/A N/A	N/A N/A	N/A.	N/A N/A	N/A N/A	N/A	N/A N/A
	\$ 120.00 \$ 120.00			U N/A	N/A	87116	N/A	N/A N/A	N/A N/A	N/A	N/A N/A	N/A N/A	N/A N/A	N/A	N/A N/A
Acid Fast Bacilli Culture	5 120.00	at a	> 120.0	U N/A	N/A	8/110	IN/A	N//A	n/a.	N/A	N/A	nya.	n/A	N/A	DUA.