Hospital Price Transparency Validator Frequently Asked Questions (FAQs)

April 14, 2024

What is the Hospital Price Transparency Validator Tool?

To support hospitals in developing machine-readable files that meet the formatting requirements of <u>45 CFR 180.50(c)(2)</u>, CMS offers a validator tool. The validator tool tests hospital machine-readable files against the required CMS template layout and data dictionary technical specifications that hospitals must conform to beginning July 1, 2024, as described, and finalized in the <u>CY 2024 OPPS/ASC Final Rule</u>. The validator tool returns errors when an uploaded file does not match the data dictionary's technical specifications. Hospitals may then fix the indicated errors and rerun the file until no errors are found. The data dictionary is available at the CMS Hospital Price Transparency - Data Dictionary GitHub repository at <u>https://github.com/CMSgov/hospital-price-transparency</u>.

Two main forms of the validator tool are available to users:

- The online validator runs in a user's web browser, and it is strongly recommended for nontechnical users. The online validator is located on the Hospital Price Transparency Tools site at <u>https://cmsgov.github.io/hpt-tool/</u>
- 2) The command-line interface (CLI) validator is a downloadable tool that runs locally in the user's terminal. We recommend that the CLI validator tool be used by technically proficient users who are validating multiple files simultaneously or integrating the validator into a software pipeline. The CLI is available at <u>https://github.com/CMSgov/hpt-validator-cli/</u>

Do the online validator and the command-line interface (CLI) validator test machine-readable files for different things? Which one should I use to test my hospital's machine-readable file?

Both forms of the validator tool use the same underlying code and will therefore test and produce the same errors and/or warnings for a machine-readable file. Your choice of form depends on your level of comfort with the technology; the online validator is designed for use by nontechnical users while the CLI is designed for use by more technically proficient users.

Is there a tutorial on how to use the online validator?

Yes. A video tutorial that demonstrates how to use the online validator tool is available at: <u>Hospital Price Transparency Tutorial: Online Validator Tool for Hospital Machine-Readable Files</u> (youtube.com)

Can I use the validator tool on any hospital machine-readable file?

Yes. However, if the hospital machine-readable file does not adhere to the <u>CMS template layout</u> <u>and data dictionary technical specifications</u> then the validator tool will produce error messages. For example, if a hospital is using version 1.0 or version 1.1 of the sample format that CMS previously made available or has developed a machine-readable file that is not in the required format, running the validator tool will produce error messages.

Which browser can I use to run the online validator tool?

The online validator tool can be used with the most recent versions of Chrome, Firefox, Edge, or Safari.

Is there a limit to the size of the machine-readable file I can upload to the online validator tool? How long does the online validator tool take to process a file?

There are no formal file size limitations for the online validator. You may experience longer processing times, depending on, for example, the size and format of your machine-readable file and the available memory of the machine you are using. If you need to test a large file, we recommend you use the <u>command-line interface (CLI) validator</u> instead of the online validator.

If my payer or plan name contains special characters, can I include them in the header of my CSV file?

In general, you may use any string, including special characters, when indicating your payer and plan names in the CSV templates, so long as the header conforms to UTF-8 and does not conflict with the form and manner requirements specified in the data dictionary. Examples:

- The data dictionary for CSV "wide" format requires headers associated with certain payer-specific negotiated charges to include a pipe separating the payer and plan names. Including any additional pipes or commas that are not specified by the data dictionary will create errors in your CSV MRF.
- The data dictionary for CSV (both "tall" and "wide" format) requires the developer of the MRF to replace "[payer]" with a payer name. Including special characters like numbers, hashtags, slashes, or ampersands will not create errors in your CSV MRF.

What output is generated by the validator tool?

The validator tool output consists of 'errors' and 'warnings.'

- An 'error' indicates the machine-readable file does not conform to the data dictionary technical specifications that are effective beginning July 1, 2024.
- A 'warning' indicates the machine-readable file does not conform to the data dictionary technical specifications that are effective beginning January 1, 2025.

For convenience and legibility, the online validator stops reviewing a machine-readable file if there are more than 250 errors. By contrast, the CLI validator default settings stop reviewing a machine-readable file if there are more than 1000 errors, but this error limit may be adjusted by the user. Both the online validator and CLI stops reviewing a machine-readable file if there are errors in rows 1 through 3 of CSV MRFs.

What should I do to fix errors that are generated by the validator tool?

Each error generated by the validator tool tells you the location of the error in your file and provides a description of the error. Your ability to fix errors will be improved if you familiarize yourself with the required technical instructions available at the CMS Hospital Price Transparency - Data Dictionary GitHub repository at https://github.com/CMSgov/hospital-price-transparency which form the basis for validator testing.

Once you have addressed the errors that are shown, rerun the file to verify that you have corrected them and to ensure there are no additional errors shown. If no error messages are displayed, you can be assured that your file meets the formatting requirements at 45 CFR 180.50(c)(2).

If I use the online validator tool and it generates errors, will it trigger an enforcement action against my hospital by CMS?

No. The online validator tool runs in the user's web browser, and uploading a file to the online validator does not share the file with CMS, nor does your use of the online validator trigger a compliance review or enforcement action by CMS.

Does CMS use the validator tool for purposes of enforcement?

Yes. If a hospital comes under a compliance review, CMS will use the validator to assess the hospital's machine-readable file for compliance with the formatting requirements at 45 CFR 180.50(c)(2). We therefore strongly encourage each hospital to run its machine-readable file through the validator tool and correct the errors generated prior to making it available to the public.

I used the validator and received an error indicating that a header column is miscoded or missing. What does that mean?

As explained in the <u>CY2024 OPPS/ASC Final Rule</u>, beginning July 1, 2024, unless otherwise specified, each hospital must encode in its machine-readable file all standard charge information, as applicable, for each of the required data elements (representing a category of data items) indicated in the regulation at <u>45 CFR 180.50(b)(2)</u>. The standard charge information must conform to a CMS template layout, data specifications, and data dictionary (45 CFR 180.50(c)(2)). Failure to include a required data element or failure to follow the data dictionary technical specifications (including misspellings or inserting extra characters such as spaces, dashes, or footnotes) can trigger an error message. Ensure that your machine-readable file format conforms to the technical specifications found at the CMS Hospital Price Transparency - Data Dictionary GitHub repository at <u>https://github.com/CMSgov/hospital-price-transparency</u>.

Where do go if I have a question about the validator or its output?

Go to the <u>Data Dictionary Discussions page</u> to see if your question has been answered before or create a new discussion post with your question. General policy questions can also be directed to: <u>PriceTransparencyHospitalCharges@cms.hhs.gov</u>. If you believe there is an issue with the technical functionality of the validator, please open an issue at <u>https://github.com/CMSgov/hpt-tool/issues</u>.