

A MEDICARE LEARNING NETWORK® (MLN) EVENT

Hospital Price Transparency: Using a CMS Template Layout to Encode Hospital Standard Charge Information

January 17, 2024

Presenters: Terri L Postma, MD, CHCQM Medical Officer

&

Scott Haselton, CMS Technical Adviser

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Centers for Medicare & Medicaid Services

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Hospital Price Transparency Regulation Introduction

- The Hospital Price Transparency regulation implements Section 2718(e) of the <u>Public Health Service</u> <u>Act</u> and requires each hospital operating within the United States to establish (and update) and 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.
- Starting on January 1, 2021, each hospital operating in the United States was required to make this information available in two ways:
 - As a comprehensive machine-readable file (MRF) with all standard charges for all items and services

<u>AND</u>

As a display of standard charges for 300 shoppable services in a consumer-friendly format





CY 2024 OPPS/ASC Final Rule Regulatory Updates

CMS finalized new <u>Hospital Price Transparency</u> requirements in the <u>CY 2024 Hospital Outpatient Prospective Payment</u> <u>System and Ambulatory Surgical Center Payment System Final Rule</u>. These new requirements include:

January 1, 2024 Improving Access to Hospital Machine-Readable Files (MRFs): Hospital websites must include a TXT file in the root folder with MRF and contact information (45 CFR 180.50(d)(6)(i)). Hospitals must place a 'footer' at the bottom of the hospital's homepage that links to the webpage that includes the machine-readable file (45 CFR 180.50(d)(6)(ii)).

July 1, 2024 O New Data Elements and Format Standardization:

- Hospital MRFs must conform to the CMS template layout and data specifications (180.50(c)(2)).
- Expanded set of data elements including, as applicable: hospital and MRF information, each type of standard charge (including payer-specific negotiated charges by payer and plan), item/service description, relevant billing codes (180.50(b)(2)).
- Hospital must affirm that it has included all applicable standard charge information in the MRF and that the information encoded is true, accurate, and complete (180.50(a)(3)(ii)).

January 1, 2025

Additional Required Data Elements: Hospitals must encode additional new data elements including: 'Estimated Allowed Amount', 'Drug Unit of Measurement', 'Drug Type of Measurement', and 'Modifiers'.



Improving Automated Access to MRFs





Improving Automated Access

- As of January 1, 2024, hospitals must ensure that the public website it selects to host its machine-readable file (MRF) establishes and maintains, in the form and manner specified by CMS:
 - $\,\circ\,$ A .txt file in the root folder that includes:
 - The hospital location name that corresponds to the MRF
 - The source page URL that hosts the MRF
 - A direct link to the MRF (the MRF URL)
 - Hospital point of contact information
 - A link in the footer on its website, including but not limited to the homepage, that is labeled "Price Transparency" and links directly to the publicly available webpage that hosts the link to the MRF.
- TXT file instructions and generator tool can be found here: https://cmsgov.github.io/hpt-tool/txt-generator/





CMS Template Technical Requirements





New Requirements to Use a CMS Template Layout and Encode Hospital Standard Charge Information

- As of July 1, 2024, hospitals' MRF must conform to a CMS template layout, data specifications, and data dictionary.
- CMS has made the CMS template available in three non-proprietary formats: CSV "tall", CSV "wide", and JSON.
- CMS has created a GitHub repository to house the required CMS templates, and provides the data dictionary, or technical instruction, on how hospitals must encode standard charge information into machine-readable files.

The CMS Hospital Price Transparency - Data Dictionary GitHub repository is available here <u>https://github.com/CMSgov/hospital-price-transparency</u>.





CMS Template: Data Elements





Data Elements Create Context for Hospital Standard Charges



'Data elements' are information or categories of information that you will use to contextualize the standard charges your hospital has established.





Data Element Overview

Hospitals must adopt a CMS template layout and encode data elements according to the technical specifications described in the data dictionary. The data elements are organized into five groups:

MRF Information	Standard Charges	Item & Service Information		
MRF Date	Gross Charge	General Description		
	Discounted Cash Price			
CMS Template Version	Payer Name	Setting		
Affirmation Statement	Plan Name	Drug Unit of Measurement*		
	Standard Charge Method			
	Payer-Specific Negotiated Charge - Dollar Amount	Drug Type of Measurement*		
Hospital Information	Payer-Specific Negotiated Charge - Percentage			
Hospital Name	Payer-Specific Negotiated Charge - Algorithm	Coding Information		
	Estimated Allowed Amount*			
Hospital Location(s)	Additional Generic Notes	Billing/Accounting Code		
Hospital Address(es)	Additional Payer-Specific Notes	Code Type		
	De-identified Minimum Negotiated Charge			
Hospital Licensure Information	De-identified Maximum Negotiated Charge	Modifiers*		

*- These data elements are not required to be encoded in hospital MRFs until January 1, 2025.





Three Ways to Display Payer-specific Standard Charges

'Payer-specific Negotiated Charge' Data Elements:	Description
Dollar Amount	Payer-specific negotiated charge (expressed as a dollar amount) that a hospital has negotiated with a third-party payer for a corresponding item or service.
Percentage	Payer-specific negotiated charge (expressed as a percentage) that a hospital has negotiated with a third-party payer for a corresponding item or service. This data element will contain the numeric representation of the percentage not as a decimal (70.5% is to be entered as "70.5" and not ".705").
Algorithm	Payer-specific negotiated charge (expressed as an algorithm) that a hospital has negotiated with a third-party payer for the corresponding item or service.

Display a payer-specific negotiated charge as a <u>dollar amount</u> whenever possible. If the payer-specific negotiated charge results in a variable dollar amount for members of a payer/plan combination, then display the payer-specific negotiated charge as a percentage or algorithm and calculate the 'Estimated Allowed Amount' in dollars.





Payer-specific Negotiated Charge Contextual Information

Required Contextual Information: For each 'payer-specific standard charge' your hospital has established, you must encode a '<u>standard charge methodology'</u>.

'Standard Charge Methodology' Data Element:

Valid Values	Methodology Description	
Case Rate	A flat rate for a package of items and services triggered by a diagnosis, treatment, or condition for a designated length of time.	
Fee Schedule	The payer-specific negotiated charge is based on a fee schedule. Examples of common fee checked the checked of common fee checked be checked by the checked of the checked	
Percent of Total Billed Charge	The payer-specific negotiated charge is based on a percentage of the total billed charges for an item or service. This percentage may vary depending on certain pre-determined criteria being met.	
Per diem	The per day charge for providing hospital items and services.	
Other	If the standard charge methodology used to establish a payer-specific negotiated charge cannot be described by one of the types of standard charge methodology above, select 'Other' and encode a detailed explanation of the contracting arrangement in additional notes.	





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Optional Data Elements

'Hospital Financial Aid Policy' and 'Billing Class' are optional data elements. They are not required to be included in hospital MRFs, but instructions have been added to support standardization of disclosure of these data elements for hospitals that wish to provide more contextual information about their charges.

Data Element	Description
Hospital Financial Aid Policy	The hospital's financial aid policy, also known as charity care or bill forgiveness, that a hospital may choose or be required to apply to a particular individual's bill. This information may be displayed as either a description or as a link to the financial aid or cash price policy on the hospital's website.
Billing Class	The type of billing for the item/service at the established standard charge. The valid values are "professional", "facility", and "both".





Introduction to CMS Templates and Data Dictionary Technical Instructions

CMS Hospital Price Transparency – Data Dictionary GitHub Repository <u>https://github.com/CMSgov/hospital-price-transparency</u>





CMS Templates and Data Dictionary are in CMS GitHub

The CMS GitHub Repository:

- Is a website used by CMS to store CMS templates and data dictionary technical instructions that your hospital must use to create its MRF.
- Provides assistance for technical questions you may have.
- Also makes available voluntary tools (such as a .txt generator) to help your hospital comply with hospital price transparency regulatory requirements.





Encoding Data Elements and Values

Data Elements are the categories of data that must be included in the MRF, represented by "headers" in a CSV spreadsheet view.

Values are the types of data that can be encoded into the MRF.

Encoding is the process of entering values in a specified form.

The **data dictionary** provides rules (i.e. EMPTY of technical instruction) for encoding your hospital's standard charge information.

EXAMPLE CSV MRF Excerpt

hospital_name,last_updated_on,version,hospital_locat
West Mercy Hospital,2024-07-01,2.0.0,West Mercy Hosp
description,code|1 ,code|1|type,code|2 ,code|2|type,

	EXAMPLE CSV MRF in Spreadsheet View							
HEADERS 🔶	hospital_name	last_updated_on	version	hospital_location				
VALUES 🗲	West Mercy Hospital	2024-07-01	2.0.0	West Mercy Hospi				
HEADERS 🔶	description	code 1	code 1 type	code 2				
	Major hip and knee join	470	MS-DRG	175869				
	Major hip and knee join		MS-DRG	175869				
	Major hip and knee join	470	MS-DRG	175869				
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Data Dictionary in GitHub for CSV

Technical Instructions are shown in GitHub for CSV as a table. It includes:

- <u>Column Header (separate instructions</u> for CSV 'Tall' vs 'Wide'): indicates the header you must use in your MRF
- <u>Name</u>: the required data element you must include in your MRF
- <u>Type</u>: indicates what type of values are valid
- <u>Definition</u>: a plain language description of the data element and valid values
- <u>Blanks Accepted</u>: Indicates whether missing values are acceptable.

General Data Elements

These required general data about the MRF must be stated once at the top of the file (i.e. the first row).

Column Header (Tall format)	Column Header (Wide format)	Name	Туре	Definition	Blanks Accepted
hospital_name	hospital_name	Hospital Name	String	The legal business name of the licensee.	No
last_updated_on	last_updated_on	MRF Date	Date	Date on which the MRF was last updated. Date must be in an ISO 8601 format (i.e. YYYY-MM-DD)	No

Required Standard Charge, Item/Service, and Coding Data Elements

After the general data elements have been disclosed, the disclosure of required standard charges, item/service, and coding data elements will begin on row 3.

If a -- is encountered in the following table, then the instruction does not apply to the specific CMS template selected. You can view both <u>CSV templates here</u>.

Column Header (Tall format)	Column Header (Wide format)	Name	Туре	Definition	Blanks Accepted
description	description	General	String	Description of each item or service provided by the hospital	No
description	description	Description	String	that	No





Types of Valid Values

Type: Indicates the expected format of the data encoded into a field below the CSV header. Types you will encounter in the data dictionary for CSV formats include:

- "Boolean" indicates the field must include either a "true" or "false". This type is used for encoding a valid value for the required affirmation statement.
- "Date" indicates a date must be inserted in the field. You will encounter this type when encoding the valid value for the "date of last update" data element.
- "Enum" indicates that you must choose from a set of predefined constants that are listed in the 'valid values' section. For example, valid values for the data element "setting" are: "inpatient", "outpatient", or "both"
- "Numeric" indicates only numbers are permitted. All "Numeric" data elements must be positive numbers. Encoding a negative number or "0" will generate a deficiency.
- "String" indicates that series of letters/characters, numbers, symbols, and spaces are allowed values.





Putting it Together

1 General Data Elements

These required general data about the MRF must be stated once at the top of the file (i.e. the first row).

Column Header (Tall format)	Column Header (Wide format)	Name	Туре	Definition	Blanks Accepted
hospital_name	hospital_name	Hospital Name	String	The legal business name of the licensee.	No
last_updated_on	last_updated_on	MRF Date	Date	Date on which the MRF was last updated. Date must be in an ISO 8601 format (i.e. YYYY-MM-DD)	No

EXAMPLE CSV MRF Excerpt

hospital_name,last_updated_on,version,hospital_locat
West Mercy Hospital,2024-07-01,2.0.0,West Mercy Hosp
description,code|1 ,code|1|type,code|2 ,code|2|type,

EXAMPLE CSV MRF in Spreadsheet View

1hospital_namelast_updated_onversionhospital_locationWest Mercy Hospital2024-07-012.0.0West Mercy Hospitaldescriptioncode 1code 1 typecode 22Major hip and knee join470 MS-DRG175								
description code 1 code 1 type code 2	4	hospital_nam	ne	last_updated	on	version	hospital_	location
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2 Required Standard Charge, Item/Service, and Coding Data Elements

After the general data elements have been disclosed, the disclosure of required standard charges, item/service, and coding data elements will begin on row 3.

If a -- is encountered in the following table, then the instruction does not apply to the specific CMS template selected. You can view both CSV templates here.

Column Header (Tall format)	Column Header (Wide format)	Name	Туре	Definition	Blanks Accepted
		Conoral		Description of each item or service provided by the hospital	
description	description	General Description	String	that	No



Data Dictionary Example: Encoding the Date of Last Update

Hospitals must update the standard charge information at least once annually.

• Encode the date in the MRF in an ISO 8601 format (i.e. YYYY-MM-DD)

Column Header (Tall format)	Column Header (Wide format)	Name	Туре	Definition	Blanks Accepted
last_updated_on	last_updated_on	MRF Date	Date	Date on which the MRF was last updated. Date must be in an ISO 8601 format (i.e. YYYY-MM-DD)	No

Data Dictionary Instructions

CSV MRF Implementation

(1	hospital_name	last_updated_on	version	he
	2	West Mercy Hospital	2024-07-01	2.0.0	W
	3	description	code 1	code 1 type	сс
	4	Major hip and knee joint replacement or reattachment of lower extremity without mcc	470	MS-DRG	17
	5	Major hip and knop joint replacement or reattachment of lower extremity without mcc	470	MS-DRG	1-
			CMS		

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Accessing Technical Instructions & Examples

CMS Hospital Price Transparency – Data Dictionary GitHub Repository <u>https://github.com/CMSgov/hospital-price-transparency</u>





Questions & Answers





Hospital Price Transparency Resources



Visit the <u>CMS Hospital Price Transparency – Data</u> <u>Dictionary GitHub Repository</u> to access the CMS templates, technical specifications, and get technical support.

Visit the <u>HPT Website Resources Page</u> for more information, including a recording of this presentation.

For additional information, please contact: PriceTransparencyHospitalCharges@cms.hhs.gov





Appendix A – Navigating GitHub and the CMS Hospital Price Transparency – Data Dictionary GitHub Repository





CMS Hospital Price Transparency – Data Dictionary GitHub Repository Homepage

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	readable files as required by	on guide contains data dictionaries, CSV templates, and JSON schema the <u>Hospital Price Transparency</u> final rules (<u>45 CFR 180</u>). chnical implementation guide for the machine readable files required			
		R 72158), please go to <u>https://github.com/CMSgov/price-transparenc</u>			





How to Sign Up and Stay Up to Date

Step 1: Click on the "Sign-up" button, enter your information, and create a username.







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How to Stay Up-to-Date

Step 2: After signing in, click on the "Watch" button in upper-right hand corner and select "All Activity." You can change this preference at any time.

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How to View General MRF Template Information Step 1: Navigate to the Homepage







How to View General MRF Template Information Step 2: Select the "README.md" file or scroll down the page







How to Access Templates and Implementation Documentation Step 1: From the homepage, select the "documentation" folder







How to Access Templates and Implementation Documentation Step 2: Select either the "CSV" or "JSON" templates from one of many places







How to Access Templates and Implementation Documentation Step 3: In CSV, select either the "Tall" or "Wide" format

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How to Access Templates and Implementation Documentation Step 4: Once you have selected the desired format, you can view the template on GitHub in "Preview" view, "Code" view, or download the template in a separate file.

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Accessing Examples Step 1: Select "examples" from homepage







Accessing Examples Step 2: Select "CSV" or "JSON"

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Scenario	Reference in <u>Wide CSV</u> Format Example	Reference in <u>Tall CSV</u> Format Example	Reference in <u>JSON</u> Format Example
Multiple hospital locations	Row 2, hospital_location	Row 2, hospital_location	Lines 5-7
Case rate: MS-DRG algorithm displayed multiple ways	Rows 4-6, Platform Health Insurance PPO	Rows 4-6	Lines 41-62
Percent of total billed charges	Rows 4-6, Region Health Insurance HMO	Row 7	Lines 65-69
Fee schedule: Standard charge is a percent of a common fee schedule where the standard charge dollar amount can be calculated	Row 7, Platform Health Insurance PPO	Row 8	Lines 92-96
Fee schedule: Standard charge is a percent of a common fee schedule where the standard charge dollar amount cannot be calculated	Row 7, Region Health Insurance HMO	Row 9	Lines 99-104
Per diem: Standard charge does not vary with length of stay	Row 8, Platform Health Insurance PPO	Row 10	Lines 127-130





Accessing Examples Step 3: For CSV, select "Tall" or "Wide"

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Accessing Examples Step 4: Once you have selected the desired format, select the example file

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Accessing Examples

Step 5: Once you have selected the desired format, you can view the example on GitHub in "Preview" view, "Code" view, or download the example in a separate file.

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How to Access and Start a Discussion

Step 1: From any page in the GitHub, select "Discussions" at the top to view discussions







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How to Access and Start a Discussion Step 2: To start a new discussion, select "New discussion"

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	Most helpful Be sure to mark someone's comment as an answer if it helps you resolve your question — they deserve the credit! •										





How to Access and Start a Discussion

Step 3: Select a discussion category and enter in the discussion information

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	Select a discussion category		
	General Chat about anything and everything here	Get started	
	Ideas Share ideas for new features	Get started	
	Polls Take a vote from the community	Get started	
	Q&A Ask the community for help Answers enabled	Get started	
	Show and tell Show off something you've made	Get started	





Appendix C - Examples





CMS Templates and Data Dictionary are in CMS GitHub

CMS templates are downloadable from GitHub: <u>https://github.com/CMSgov/hospital-price-transparency/tree/master/documentation/CSV/templates</u>

• Templates are pre-populated with headers, template version (2.0.0) and the required affirmation statement.

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Data Dictionary Example: Using Pipes for Encoding Valid Values

Use "Pipes" to indicate a separation for different pieces of information in a single cell.

• Example: your hospital's standard charges apply to multiple hospital locations/addresses

Column Header (Tall format)	Column Header (Wide format)	Name	Туре	Definition	Blanks Accepted
hospital_location	hospital_location	Hospital Location(s)	String	The unique name of the hospital location absent any acronyms.	No

Data Dictionary Instructions

CSV MRF Implementation

	last_updated_on	version	hospital_location	hospital_address				
	2024-07-01	2.0.0	West Mercy Hospital West Mercy Surgical Center	12 Main Street, Fullerton, CA 92832 23 Ocean Ave, San Jo:				
	code 1	code 1 type	code 2	code 2 type				
	470	MS-DRG	175869	LOCAL				
	/70	MC DDC	175000					



Data Dictionary Example: Use of Pipes and Brackets in Headers

Brackets signal that you must supply relevant information

Example: Hospital license number

Column Header (Tall format)	Column Header (Wide format)	Name	Туре	Definition	Blanks Accepted
license_number [state]	license_number [state]	Hospital Licensure Information	String	The hospital license number and the licensing state or territory's two-letter abbreviation for the hospital location(s) indicated in the file. See <u>additional csv</u> <u>placeholder notes</u> for	Yes

Data Dictionary Instructions

CSV MRF Implementation

	D	E	F
1	nospital_location	hospital_address	license_number CA
2	West Mercy Hospital West Mercy Surgical Center	12 Main Street, Fullerton, CA 92832 23 Ocean Ave, San Jose, CA 94088	50056



Data Dictionary Example: Required Affirmation Statement

You must include and affirmation statement in the MRF and encode either "true" or "false"

Column Header (Tall format)	Column Header (Wide format)	Name	Туре	Definition	Blanks Accepted
Header is <u>Affirmation</u> <u>Statement</u>	Header is <u>Affirmation</u> <u>Statement</u>	Affirmation Statement	Boolean	Required affirmation statement. Valid values: true and false. See <u>additional affirmation notes</u> for more details.	No

Data Dictionary Instructions

CSV MRF Implementation

	E	F	G
			To the best of its knowledge and belief, the hospital
			has included all applicable standard charge
			information in accordance with the requirements of
			45 CFR 180.50, and the information encoded is true,
1	hospital_address	license_number CA	accorate, and complete as of the date indicated.
2	12 Main Street, Fullerton, CA 92832 23 Ocean Ave, San Jose, CA 94088	50056	TRUE

