

Price Transparency Updates from 2024 OPPS Final Rule

New requirements (45 CFR §180.50 and 45 CFR §180.60)

Contents

Helpful References for Regulation Compliance	2
How to generate your TXT file	2
How to locate your CorroHealth Price Transparency site URL	2
How to locate your MRF (Machine Readable File) URL from CorroHealth	2
January 1, 2024 Requirements	3
Good Faith Effort	3
"Price Transparency" Footer	3
TXT File with MRF URL	3
July 1, 2024 Requirements	4
Affirmation in the MRF	4
Negotiated Charge Description in MRF	4
Standard Charge Methodology Encoding	4
MRF General Data Elements	5
MRF General Description of Item or Service	5
MRF "Setting" Data Element	5
MRF Code Type Details	5
MRF Modifier Inclusion	6
MRF Format from CMS:	6
January 1, 2025 Requirements	7
MRF Drug Type and Unit of Measure	7
MRF Estimated Allowed with Charges based on Percent	7
CLARIFICATION: TXT File Location	8



Helpful References for Regulation Compliance

How to generate your TXT file

Visit the CMS Hospital Price Transparency Tools GitHub at <u>https://cmsgov.github.io/hpt-tool/txt-generator/</u>

On this repository you can:

- Access requirements and technical specifications for the TXT file, as well as an example TXT file.
- Use the TXT file generator tool to create the required TXT file 45 CFR 180.50 (d)(6).
- Use the MRF file naming tool to create a compliant naming convention for your MRF 45 *CFR 180.50 (d)(5).*
- **Coming** soon from CMS Use validator 2.0 to check that your MRF complies with the CMS template layout and data encoding requirements (requirements are effective July 1, 2024) *45 CFR 180.50 (c)(2)*.

How to locate your CorroHealth Price Transparency site URL

Option 1:

- 1. Navigate to your CorroHealth Price Transparency page from your hospital's website.
- 2. When on the site, the URL presented in the browser window is appropriate to use and share when requested.

Option 2:

- 1. Log into the PARA Data Editor at https://www.para-hcfs.com/login
- 2. Click the "PTT/NSA" tab
- 3. In the "PTT Process" sub-tab, copy the URL in the "Active Link" field (see below)

How to locate your MRF (Machine Readable File) URL from CorroHealth

- 1. Log into the PARA Data Editor at https://www.para-hcfs.com/login
- 2. Click the "PTT/NSA" tab
- 3. In the "PTT Process" sub-tab, copy the URL in the "MRF Link" field (see below)

PARA Data Editor - Demonstration Hospital PTT [DEMO]					dbDHPANAHEIMCA							Contact Support Log Out			
Select Charge Quote	Charge Process	Claim/RA	Contracts	Pricing Data	Pricing	Rx/Supplies	Filters	CDM	Calculator	Advisor	Admin	CMS	PTT/NSA	Tasks	PARA
PTT Process PAMA Pr	ocess Table 1 by	CDM Tab	e 1 by DRG	Extract/Tabl	e 2 CDI	M Map Contra	act Map	Self-P	ay Exemptio	ons/Overr	ide Sta	tistics	Registrat	ion NS	A Link
ownload PTT Narrative	Active Link: http	s://apps.par	a-hcfs.com/l	PTT/FinalLinks/P	TT_Demo	<u></u>	RF Link	https://	/apps.para-h	cfs.com/P ⁻	TT//Final	Links/R	leports. 📦	Sav	e Process



January 1, 2024 Requirements

Good Faith Effort

Description: Hospitals must make a good faith effort to ensure standard charges are true, accurate, and complete as of the date indicated in the MRF (Machine Readable File). This statement must be included in the MRF.

Responsible Party: CorroHealth

Status/Next Steps: CorroHealth will add the following statement to all client Machine Readable Files by Jan 1, 2024. The statement will read "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, accurate, and complete as of the date indicated."

"Price Transparency" Footer

Description: Hospitals must include a 'footer' labeled "Price Transparency" (not "Hospital Price Transparency") at the bottom of the homepage that links to the webpage that includes the MRF (Machine Readable File).

Responsible Party: Client

Status/Next Steps: Ensure or update your website to include a link to your CorroHealth Price Transparency site labeled "Price Transparency". This link and text must be placed in the footer of your website. This is an adjustment that is typically handled by the Web Master or Marketing department for a provider.

TXT File with MRF URL

Description: The .txt file must be in the root folder of the publicly available website that posts the hospital's MRF (Machine Readable File). The .txt file must identify the URL for both the MRF and the webpage that contains the link to the MRF.

Responsible Party: Client

Status/Next Steps: Utilize the "Helpful References for Regulation Compliance" in this document to address this item. Ensure or update your website to include a .TXT file titled "cms-hpt.txt" in the root folder of your website that includes:

- 1. location-name:
- 2. source-page-url: (This is the link to your CorroHealth Price Transparency site)
- 3. mrf-url: (This is a link to your CorroHealth Machine Readable File)
- 4. contact-name:



5. contact-email:

July 1, 2024 Requirements

Affirmation in the MRF

Description: Hospitals must affirm in the MRF (Machine Readable File) that to the best knowledge and belief, the hospital has included all applicable standard charge information in its MRF (Machine Readable File), per the requirements of § 180.50, and that the information encoded is true, accurate, and complete as of the date indicated in the MRF (Machine Readable File).

Responsible Party: CorroHealth

Status/Next Steps: CorroHealth will modify the MRF for all clients to include a standard affirmation meeting the requirement by July 1, 2024.

Negotiated Charge Description in MRF

Description: Hospitals must indicate in their MRF (Machine Readable File) if the standard charge is a dollar amount, percentage or algorithm. If the charge is based on a percentage or algorithm, the MRF (Machine Readable File) must include a description (list of factors or link to the algorithm).

******* Plans may be categorized when payer-specific negotiated charges apply to each plan in the category (i.e., "all PPO plans")

Responsible Party: CorroHealth

Status/Next Steps: CorroHealth has mapped this information from loaded customer payer contracts. This information will be presented within all client MRFs by July 1, 2024.

Standard Charge Methodology Encoding

Description: New data element requirement for payer-specific negotiated charges: Hospitals must encode the method used to establish the "standard charge" (standard charge methodology)

Responsible Party: CorroHealth

Status/Next Steps: CorroHealth has mapped this information from loaded customer payer contracts. This information will be presented within all client MRFs by July 1, 2024.



MRF General Data Elements

Description: Hospitals must encode standard charge information for "general" data elements: (hospital name, license, location, the version # of the CMS template, and most recent update to the standard charge info in a machine-readable file (MRF).

Responsible Party: CorroHealth

Status/Next Steps: CorroHealth will have this information presented within all client MRFs by July 1, 2024.

MRF General Description of Item or Service

Description: MRF (Machine Readable File) must include a general description of the item or service

Responsible Party: CorroHealth

Status/Next Steps: This requirement is currently met in the CorroHealth solution.

MRF "Setting" Data Element

Description: Establishing a "setting" as a separate data element to indicate whether the item or service is provided in connection with an inpatient admission or an outpatient department visit.

Responsible Party: CorroHealth

Status/Next Steps: This requirement is currently met in the CorroHealth solution.

MRF Code Type Details

Description: Hospitals must include the accounting or billing code and code type_for items or services (e.g., CPT®, HCPCS, NDC, DRG, etc.)

Responsible Party: CorroHealth

Status/Next Steps: This requirement will be met in the CorroHealth solution by July 1, 2024.



MRF Modifier Inclusion

Description: MRF (Machine Readable File) must include modifiers (and modifier description) when a modifier may change the standard charge

Responsible Party: CorroHealth

Status/Next Steps: This requirement will be met in the CorroHealth solution by July 1, 2024.

MRF Format from CMS:

Description: MRF (Machine Readable File) must conform to a CMS template layout_(CSV "tall", CSV "wide" or JSON schema and data dictionary found on the CMS website.

Responsible Party: CorroHealth

Status/Next Steps: CorroHealth will deploy the "tall" format and template from CMS to address this requirement. CorroHealth will have format deployed within all client MRFs by July 1, 2024.



January 1, 2025 Requirements

MRF Drug Type and Unit of Measure

Description: Hospitals must encode drug unit and type of measurement

Responsible Party: CorroHealth

Status/Next Steps: This requirement will be met in the CorroHealth solution by January 1, 2025.

MRF Estimated Allowed with Charges based on Percent

Description: The MRF (Machine Readable File) must specify the estimated allowed amount for the item or service if the standard charge is based on percent or algorithm.

Responsible Party: CorroHealth

Status/Next Steps: This requirement is currently met in the CorroHealth solution.



CLARIFICATION: TXT File Location

Clients have asked for clarification regarding the proper location of the .TXT file addressed in this document. The following provides greater details and clarification regarding the proper location of this file.

CMS Guidance on the Topic:

The CMS Fact Sheet found at <u>https://www.cms.gov/newsroom/fact-sheets/hospital-price-transparency-fact-sheet</u> described the following related to this item:

Improved Accessibility for Oversight

CMS finalized two changes that would permit automated access and real-time centralization of the files and standard charges data, including: 1) requiring hospitals to place a 'footer' at the bottom of the hospital's homepage that links to the webpage that includes the MRF; and 2) requiring hospitals to ensure that a .txt file is included in the root folder of the publicly available website chosen by the hospital for posting its MRF. The .txt file must identify the URL for both the MRF and the webpage that contains the link to the MRF. CMS believes these requirements will improve the automated accessibility of hospital standard charges information and streamline CMS enforcement of the requirements.

Question: Why is this file required on our hospital's public web-site?

- 1. These regulations are designed to allow CMS bots to easily navigate (or crawl) client sites to determine compliance with the regulation.
- 2. The bot needs crawl the publicly available client website and locate a file specific to your organization giving direction to the bot on where to find:
 - a. The MRF file
 - b. The exact page that contains the link for patients access to pricing data
- 3. Placing the .TXT file in the root folder of the organization's site allows the bot to find and access these critical links quickly and accurately.

Question: Why would CorroHealth not be required to post this .TXT file at the root folder of the Price Transparency page maintained for clients?

Placing these files on the CorroHealth or any other Price Transparency vendor's site at the root folder level would not meet the regulations demands. Any root folder for a Price Transparency vendor would need to contain one .TXT file with the link to hundreds of sites and hundreds of client MRF files. This would cause confusion for the bots crawling sites and create false flags for non-compliance for all clients.